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Neuadd y Sir
Y Rhadyr
Brynbuga
NP15 1GA

Dydd Mercher, 16 Hydref 2024

Hysbysiad o gyfarfod:

Cyngor Sir

Dydd Iau, 24ain Hydref, 2024 at 2.00 pm, Council Chamber - Council Chamber

AGENDA

Cynhelir gweddïau cyn y cyfarfod Cyngor am 13.50pm. Mae croeso i bob aelod ymuno â'r Cadeirydd ar gyfer hynny os ydynt yn dymuno gwneud hynny

.

Eitem No	Eitem	Tudalennau
1.	Ymddiheuriadau am absenoldeb	
2.	Datganiadau o Fuddiant	
3.	Cyhoeddiad y Cadeirydd	1 - 2
4.	Cadarnhau cofnodion y cyfarfod a gynhaliwyd ar 19 Medi 2024	3 - 10
5.	Cwestiynau Cyhoeddus	11 - 12
6.	Adroddiadau i'r Cyngor:	
6.1.	CYNLLUN DATBLYGU LLEOL NEWYDD ADNAU	13 - 1876
6.2.	Datganiad Polisi Gamblo a Chynigion ar gyfer Casinos	1877 - 1942
6.3.	Adroddiad Blynyddol y Pwyllgor Safonau ar gyfer 2023/24	1943 - 1958
6.4.	Adroddiad Gwerthuso Blynyddol Diogelu	1959 - 2010
6.5.	Adroddiad Blynyddol 2023/2024, Cyfarwyddwr Gofal Cymdeithasol, Diogelu ac Iechyd	2011 - 2028

7.	**Cynigion i'r Cyngor:**	
7.1.	**Cyflwynwyd gan y Cynghorydd Sir Meirion Howells** Mae'r Cyngor yn nodi ymgyrch Bang Out of Order RSPCA sy'n amlygu sut y mae tân gwyllt yn effeithio ar anifeiliaid anwes a da byw, gyda llawer ohonynt yn niweidio eu hunain mewn ymateb i sŵn a fflachiadau. Mae'r Cyngor felly yn penderfynu: • hyrwyddo ymgyrch ymwybyddiaeth cyhoeddus drwy sianeli cyfryngau cymdeithasol y Cyngor am effaith tân gwyllt ar les anifeiliaid a phobl fregus – yn cynnwys y mesurau rhagofalu y gellir eu cymryd i liniaru risgiau. • ysgrifennu at Lywodraeth Cymru yn eu hannog i ddefnyddio unrhyw ddulliau sydd ar gael iddynt i liniaru unrhyw effeithiau negyddol cynnal arddangosiadau gwaith tân ar anifeiliaid a phobl fregus. • Ysgrifennu at Lywodraeth y DU yn eu hannog i gyflwyno deddfwriaeth i gyfyngu uchafswm lefel sŵn i 90dB ar gyfer y rhai a gaiff eu gwerthu i'r cyhoedd ar gyfer arddangosiadau preifat.	
7.2.	**Cyflwynwyd gan y Cynghorydd Sir Howells** Mae'r Cyngor yn cefnogi ymgyrch i ddatganoli rheolaeth Stad y Goron a'i asedau yng Nghymru i Lywodraeth Cymru a bod yr arian a godwyd i gefnogi anghenion cymdeithasol pobl Cymru. Mae'r Cyngor yn galw ar yr Arweinydd i ysgrifennu at Lywodraeth Cymru yn amlinellu ein cefnogaeth i helpu darbwyllo Llywodraeth y DU i ddatganoli Stad y Goron fel mater o frys.	
8.	**Dyddiad y cyfarfod nesaf - 12 Rhagfyr 2024**	

Paul Matthews
Prif Weithredwr

CYNGOR SIR FYNWY

MAE CYFANSODDIAD Y PWYLLGOR FEL SY'N DILYN:

Cynghorwyr Sir:	Rachel Buckler
	Laura Wright
	Tony Kear
	Catrin Maby
	Jan Butler
	Ian Chandler
	Sara Burch
	Alistair Neill
	Su McConnel
	Mary Ann Brocklesby
	Fay Bromfield
	Jane Lucas
	Emma Bryn
	Peter Strong
	Meirion Howells
	Paul Griffiths
	Jackie Strong
	Rachel Garrick
	Maria Stevens
	Steven Garratt
	Angela Sandles
	Ben Callard
	John Crook
	Tomos Davies
	Dale Rooke
	Sue Riley
	Jayne McKenna
	Jill Bond
	Louise Brown
	Lisa Dymock
	Tony Easson
	Christopher Edwards
	Martyn Groucutt
	Simon Howarth
	Richard John
	David Jones
	Penny Jones
	Malcolm Lane
	Phil Murphy
	Paul Pavia
	Maureen Powell
	Frances Taylor
	Tudor Thomas
	Armand Watts
	Ann Webb

Gwybodaeth Gyhoeddus

Mynediad i gopïau papur o agendâu ac adroddiadau
Gellir darparu copi o'r agenda hwn ac adroddiadau perthnasol i aelodau'r cyhoedd sy'n mynychu cyfarfod drwy ofyn am gopi gan Gwasanaethau Democrataidd ar 01633 644219. Dylid nodi fod yn rhaid i ni dderbyn 24 awr o hysbysiad cyn y cyfarfod er mwyn darparu copi caled o'r agenda hwn i chi.

Edrych ar y cyfarfod ar-lein
Gellir gweld y cyfarfod ar-lein yn fyw neu'n dilyn y cyfarfod drwy fynd i www.monmouthshire.gov.uk neu drwy ymweld â'n tudalen Youtube drwy chwilio am MonmouthshireCC. Drwy fynd i mewn i'r ystafell gyfarfod, fel aelod o'r cyhoedd neu i gymryd rhan yn y cyfarfod, rydych yn caniatáu i gael eich ffilmio ac i ddefnydd posibl y delweddau a'r recordiadau sain hynny gan y Cyngor.

Y Gymraeg
Mae'r Cyngor yn croesawu cyfraniadau gan aelodau'r cyhoedd trwy gyfrwng y Gymraeg neu'r Saesneg. Gofynnwn yn barchus i chi roi rhybudd digonol i ni er mwyn darparu ar gyfer eich anghenion.

Nodau a Gwerthoedd Cyngor Sir Fynwy

Ein Pwrpas

- i ddod yn sir ddi-garbon, gan gefnogi lles, iechyd ac urddas i bawb ar bob cam o'u bywydau.

Amcanion rydym yn gweithio tuag atynt

- Lle teg i fyw lle mae effeithiau anghydraddoldeb a thlodi wedi'u lleihau;
- Lle gwyrdd i fyw a gweithio gyda llai o allyriadau carbon a gwneud cyfraniad cadarnhaol at fynd i'r afael â'r argyfwng yn yr hinsawdd a natur;
- Lle ffyniannus ac uchelgeisiol, lle mae canol trefi bywiog a lle gall busnesau dyfu a datblygu;
- Lle diogel i fyw lle mae gan bobl gartref maen nhw'n teimlo'n ddiogel ynddo;
- Lle cysylltiedig lle mae pobl yn teimlo'n rhan o gymuned ac yn cael eu gwerthfawrogi;
- Lle dysgu lle mae pawb yn cael cyfle i gyrraedd eu potensial.

Ein Gwerthoedd

Bod yn agored. Rydym yn agored ac yn onest. Mae pobl yn cael cyfle i gymryd rhan mewn penderfyniadau sy'n effeithio arnynt, dweud beth sy'n bwysig iddynt a gwneud pethau drostynt eu hunain/eu cymunedau. Os na allwn wneud rhywbeth i helpu, byddwn yn dweud hynny; os bydd yn cymryd peth amser i gael yr ateb, byddwn yn esbonio pam; os na allwn ateb yn syth, byddwn yn ceisio eich cysylltu gyda'r bobl a all helpu - mae adeiladu ymddiriedaeth ac ymgysylltu yn sylfaen allweddol.

Tegwch. Darparwn gyfleoedd teg, i helpu pobl a chymunedau i ffynnu. Os nad yw rhywbeth yn ymddangos yn deg, byddwn yn gwrando ac yn esbonio pam. Byddwn bob amser yn ceisio trin pawb yn deg ac yn gyson. Ni allwn wneud pawb yn hapus bob amser, ond byddwn yn ymrwymo i wrando ac esbonio pam y gwnaethom weithredu fel y gwnaethom.

Hyblygrwydd. Byddwn yn parhau i newid a bod yn hyblyg i alluogi cyflwyno'r gwasanaethau mwyaf effeithlon ac effeithiol. Mae hyn yn golygu ymrwymiad gwirioneddol i weithio gyda phawb i groesawu ffyrdd newydd o weithio.

Gwaith Tîm. Byddwn yn gweithio gyda chi a'n partneriaid i gefnogi ac ysbrydoli pawb i gymryd rhan fel y gallwn gyflawni pethau gwych gyda'n gilydd. Nid ydym yn gweld ein hunain fel 'trefnwyr' neu ddatryswyr problemau, ond gwnawn y gorau o syniadau, asedau ac adnoddau sydd ar gael i wneud yn siŵr ein bod yn gwneud y pethau sy'n cael yr effaith mwyaf cadarnhaol ar ein pobl a lleoedd.

Caredigrwydd – Byddwn yn dangos caredigrwydd i bawb yr ydym yn gweithio gyda nhw, gan roi pwysigrwydd perthnasoedd a'r cysylltiadau sydd gennym â'n gilydd wrth wraidd pob rhyngweithio.

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Chair's Report
13th October – 19th October

Sunday 13th October 3 p.m.	RBL – Standard Flag – Service of dedication St Mary's Priory Church, Abergavenny
Tuesday 15th October 5 p.m.	Private Viewing 'What Makes Monmouth, Monmouth' Shire Hall, Usk
Saturday 19th October 2 p.m.	Girlguiding Gwent Annual Review Parkway Hotel, Cwmbran

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MONMOUTHSHIRE COUNTY COUNCIL

Minutes of the meeting of County Council held on Thursday, 19th September, 2024 at 2.00 pm

PRESENT: County Councillor Su McConnel
County Councillor Peter Strong (Vice Chairman, as Chair)

County Councillors: Rachel Buckler, Laura Wright, Tony Kear, Catrin Maby, Jan Butler, Ian Chandler, Sara Burch, Alistair Neill, Mary Ann Brocklesby, Fay Bromfield, Jane Lucas, Emma Bryn, Peter Strong, Meirion Howells, Paul Griffiths, Jackie Strong, Rachel Garrick, Maria Stevens, Steven Garratt, Angela Sandles, Ben Callard, John Crook, Tomos Davies, Dale Rooke, Sue Riley, Jayne McKenna, Jill Bond, Louise Brown, Lisa Dymock, Tony Easson, Christopher Edwards, Martyn Groucutt, Richard John, David Jones, Penny Jones, Malcolm Lane, Phil Murphy, Paul Pavia, Maureen Powell, Frances Taylor, Tudor Thomas, Armand Watts and Ann Webb

OFFICERS IN ATTENDANCE:

Peter Davies	Deputy Chief Executive and Chief Officer, Resources
Jane Rodgers	Chief Officer for Social Care, Safeguarding and Health
Will McLean	Chief Officer for Children and Young People
Nicola Perry	Senior Democracy Officer
Frances O'Brien	Chief Officer, Communities and Place
Matthew Gatehouse	Chief Officer People, Performance and Partnerships.
Ian Saunders	Chief Officer Customer, Culture and Wellbeing.
James Williams	Chief Officer Law & Governance

APOLOGIES:

County Councillors Simon Howarth

1. **Declarations of interest**

None.

2. **Chair's Announcement**

Noted.

3. **To confirm the minutes of the meeting held on 18th July 2024**

The minutes of the previous meeting were accepted as a accurate record.

4. **Petition to Council - Restore Night Shelter in Monmouth**

County Councillor Louise Brown presented a petition to restore the night shelter in Monmouth on behalf of County Councillor Jane Lucas.

The Deputy Leader, County Councillor Paul Griffiths thanked the Churches in Monmouth Housing Group for bringing the petition, welcoming the opportunity to discuss, in public debate, the homelessness situation in Monmouthshire.

The Deputy Leader offered a commitment to meet with Churches in Monmouth so that an agreement could be made on how to work together to find suitable accommodation and provide support to homeless people in Monmouth. Following this, progress will be reported to Place Scrutiny Committee.

A motion was proposed and seconded that the petition be referred to Cabinet.

https://www.youtube.com/live/xIPra7V_a9o?si=JJ1rWnwblEE92dBy&t=271

5. **Reports to Council:**

6. **Governance and Audit Committee Annual Report 2023/24**

Andrew Blackmore, Chair of the Governance & Audit Committee presented the Annual Report to Council explaining that the Committee had discharged its responsibilities and had been effective in holding officers to account and also supporting them in making targeted improvements.

There were concerns that restructures of Finance and Audit departments were not yet fully implemented. It was of particular concern that a permanent Chief Internal Auditor had not been appointed. The Committee thought this disappointing and should be of concern to Council.

In terms of risk, Mr. Blackmore expressed concern around the uncertainty the lack of this appointment is causing on the existing team within the internal audit function, but added, that, more importantly, it sets a tone around leadership, particularly given the financial challenges being faced by the Council.

https://www.youtube.com/live/xIPra7V_a9o?si=M6LNWMRtrDp2wYUV&t=1240

7. **Appointment to Outside Body**

The Cabinet Member for Equalities and Engagement, County Councillor Angela Sandles presented the report to appoint a Monmouthshire Councillor to be a representative on the Rachel Herbert's School Endowment Charity.

Council resolved to approve the appointment of the member for the Grofield Ward, County Councillor Laura Wright, as representative to the outside body.

https://www.youtube.com/live/xIPra7V_a9o?si=FN2pbETOEjvaAEYW&t=1705

8. **Self-Assessment 2023/24**

The Leader of the Council presented the report to seek Council approval of the self-assessment report 2023/24 to ensure that members have a clear and transparent assessment of the authority's performance during the year ending 31 March 2024 in line with requirements outlined in the Local Government and Elections (Wales) Act 2021.

Upon being put to a vote Council resolved to accept the recommendation:

That the self-assessment for 2023/24 be approved.

https://www.youtube.com/live/xIPra7V_a9o?si=i_VfAOmlZy6KJKt4&t=1769

9. People with Care Experience

County Councillor Ian Chandler, Cabinet Member for Social Care, Safeguarding and Accessible Health Services presented the report for Council to consider proposed measures that the Council may implement to help care experienced people (people who have spent time in care when they were under 18 years old) overcome the disadvantages and discrimination they experience.

Upon being put to a vote Council resolved to accept the recommendations:

That 'care experienced people' is added to the Council's Integrated Impact Assessment, so that any impact of policy decisions on people with care experience is identified and taken into account when those decisions are made.

In relation to recruitment, currently the Council guarantees an interview to individuals who have been in the care of the Monmouthshire County Council provided they meet the selection criteria set out in the job description. It is proposed that this be expanded to individuals who have been in the care of other Local Authorities.

When setting and reviewing the Council's Strategic Equality Objectives, it is proposed that the Council include consideration of how it might overcome the disadvantages and discrimination experienced by care experienced people.

https://www.youtube.com/live/xIPra7V_a9o?si=LaaCYc5k2bl2B0C9&t=2968

10. Motions to Council:

11. Submitted by County Councillor Frances Taylor

That this Council recognise the significant concern of Magor with Undy residents about the curtailment of local GP practice services and the afternoon closure of Magor Surgery.

This Council notes that the Health Board's "Change to Service Provision Policy" has previously not made provision for patient engagement or wider stakeholder engagement such as local councillors, and welcomes that following recent discourse, the Health Board has recognised the value and importance of such engagement and will update the policy for future changes.

Furthermore, that this council agrees to write to Aneurin Bevan Health Board and other relevant organisations such as Llais and NHS Wales to seek clarification on the relevant appeal process for the decision on Magor Surgery, and to secure detail of the proposed changes to the service change policy with particular reference to engagement and communication, Integrated Future Generations/Equalities Impact Assessment requirements.

Seconded by County Councillor David Jones.

https://www.youtube.com/live/xIPra7V_a9o?si=aeoIlPzVZTIXVgi3&t=3793

Upon being put to a vote the motion was carried.

County Councillor Frances Taylor left the meeting 15:40pm

12. Submitted by County Councillor Richard John

Regrets the UK Government's decision to restrict the Winter Fuel Payment to only pensioners in receipt of means-tested benefits like Pension Credit.

Notes the estimated impact of this decision on over 20,000 Monmouthshire pensioners, some of whom are just above the threshold for Pension Credit and need the money to stay warm this winter.

Agrees to bring forward a Council-led local awareness campaign about eligibility for Pension Credit may help our poorest residents to access the Winter Fuel Payment.

Agrees that the Leader will write to the Chancellor of the Exchequer requesting a review of the decision to restrict the Winter Fuel Payment and asking the government to ensure that vulnerable pensioners, particularly those who do not claim Pension Credit, are protected from fuel poverty.

Seconded by County Councillor Lisa Dymock.

https://www.youtube.com/live/xIPra7V_a9o?si=6XgHq_F0Yh0uKcQZ

County Councillor Ian Chandler proposed an amendment

This Council:
Regrets the UK Government's decision to restrict the Winter Fuel Payment to only pensioners in receipt of Pension Credit and some other means-tested benefits.

Notes the estimated impact of this decision on many Monmouthshire pensioners, some of whom are just above the threshold for Pension Credit and need the money to stay warm this winter.

Applauds the work that the Council and its partners are doing to support residents vulnerable to fuel poverty, including local awareness campaigns and advice about eligibility for Pension Credit to help our poorest residents access the Winter Fuel Payment and other benefits

Calls upon the Chancellor of the Exchequer to review the decision to restrict the Winter Fuel Payment and ensure that vulnerable pensioners, particularly those who do not claim Pension Credit, are protected from fuel poverty.

Seconded by County Councillor Howells

Upon being put to a vote the amendment was carried and debate ensued on the motion, as amended.

https://www.youtube.com/live/xIPra7V_a9o?si=xd9vlFJNs39hNQWC&t=8085

Upon being to put to a vote the motion, as amended, was carried.

13. Submitted by County Councillor Richard John

Notes that over 12% of school age pupils residing in Monmouthshire attend independent schools.

Expresses concern about the disruption to children's schooling that is likely to be caused by the UK Government's policy of charging VAT on school fees.

Instructs the administration to publish plans to mitigate the impact of this policy on Monmouthshire children including providing local school places and supporting children whose education has been disrupted.

Seconded by County Councillor Alistair Neill

https://www.youtube.com/live/xIPra7V_a9o?si=gsxCoVXE2XXRxv9J&t=9979

Upon being put to a vote the motion was defeated.

14. Members Questions:

15. From County Councillor Jackie Strong to County Councillor Paul Griffiths Cabinet Member for Planning and Economic Development Deputy Leader

Can the Cabinet member for Planning and Economic Development give an update on work done by MCC to facilitate the opening of a Post Office in Caldicot Town Centre?

The Cabinet Member reported that the new Post Office in Caldicot Town Centre was expected to open on Monday 14th October, in the former store known as Country Flowers. Members were reminded that the previous Post Office closed when the host premise closed. The Council negotiated with Monmouthshire Housing Association to reserve a unit at Holman House and worked in partnership with Post Office Ltd to market the opportunity to local businesses.

In undertaking the work, Council has been able to use the support of WG Placemaking Grant Programme and is providing grant funding to the new business to refurbish the unit.

As a supplementary County Councillor Jackie Strong asked that the Cabinet Member conveys thanks on behalf of residents and fellow councillors to the Chief Officer Communities and Place and her colleagues.

16. From County Councillor Fay Bromfield to County Councillor Catrin Maby Cabinet Member for Climate Change and the Environment

Can the Cabinet Member please confirm what steps she is taking to combat the issue of Ragwort?

The Cabinet Member was aware of concerns and explained that Ragwort was native to the UK and is beneficial to wildlife and biodiversity, supporting a number of pollinators and insects. In the right environment Ragwort is positive and should not be destroyed. However, it is classed as an injurious weed as it is poisonous to livestock.

WG have a specific code of practice on Ragwort which can be found in full on the WG website. A key point being that most grazing animals such as cows, horses and sheep will avoid eating

common Ragwort and is mainly a danger when included in hay. Current advice is that Ragwort should only be removed from areas that are cultivated for feed or where grazing is limited.

MCC does not have specific plans to clear Ragwort from road verges however large sections have been manually removed where concerns have been raised adjacent to land used for grazing. It was advised that members of the pubic do not attempt to remove plants or spray with weed killer.

17. From County Councillor Fay Bromfield to County Councillor Catrin Maby Cabinet Member for Climate Change and the Environment

Can the Cabinet Member provide an update on any discussions that the administration is having with Welsh water regarding the health of our rivers?

The Cabinet Member explained that MCC is directly engaged in water quality discussions on a regular basis within the Usk and Wye Partnerships, which include Welsh Water, the regulatory agencies, neighbouring local authorities, farming and environmental groups. A major focus for these discussions tended to be on the excess nutrients, phosphates and nitrates, which are causing damage to river diversity.

As a supplementary County Councillor Bromfield welcomed further information, particularly around Public Health Wales. The Cabinet Member was asked to update Members quarterly, to which she agreed. County Councillor Maby also agreed to email an update on the issue around bacteria and swimming.

18. From County Councillor Tony Kear to County Councillor Paul Griffiths Cabinet Member for Planning and Economic Development Deputy Leader

Please can the Cabinet Member update Council on the proposed Countywide review of car park charges?

The Cabinet Member explained that a consultant has been appointed to support the car park review and is currently undertaking a base study, collecting data on current and historic usage. Following an upcoming meeting it was hoped that the study would move on to engagement with communities, businesses, town and community councils and Members. There would be public consultation should any proposals for change emerge from the process.

As a supplementary County Councillor Kear referred to a recent survey conducted by Usk Town Council which saw over 1600 responses and sought reassurances that the huge number of responses and strong views would be taken into consideration in the consultation period and that a charging regime would not be implemented to raise revenue.

The Cabinet Member responded that there were many objectives to a car park charge regime, one of which was to raise revenue, and noted that very few people favour paying charges.

19. From County Councillor Tony Kear to County Councillor Paul Griffiths Cabinet Member for Planning and Economic Development Deputy Leader

Please can the Cabinet Member advise of the current allocation of parking enforcement officers around Monmouthshire and the basis of the allocation?

The Cabinet Member advised that there are 5 officers within the Civil Parking Enforcement team, but with staffing issues there is usually less than half this number patrolling. It was thought that the optimum level of enforcement was not taking place. The Cabinet Member was assured that the review on car parking charges includes a reflection on the regime for enforcement.

As a supplementary County Councillor Kear referred to the issue of double yellow parking in Usk and asked that the Cabinet Member agree to work with both ward members to ensure that when the review takes place there is a fairer allocation to Usk and greater time given to enforcement than is currently being spent in Usk. The Cabinet Member agreed to work with Councillors Kear, Howells and stakeholders in all aspects of the review.

20. From County Councillor Tony Kear to County Councillor Martyn Groucut Cabinet Member for Education

Could the Cabinet Member advise the reasons for the overcrowding on the school busses from Usk to Monmouth Comprehensive school this term?

The Cabinet Member was not aware of incidents of overcrowding on school buses and suggested this referred to secondary school pupils travelling on public service vehicles. The operating rules for public service vehicles permit passengers to stand if the capacity is not exceeded. MCC are currently allocating secondary learners three public service vehicles to access Monmouth Comprehensive.

It was thought that the question related to Number 60 service which is operated by Newport Bus. Capacity of the vehicles is between 61 and 70, with seating capacity for 29 to 33. 29 learners have been allocated bus passes on this service, and on average 20 fare paying customers.

As a supplementary County Councillor Kear expressed thanks to Becky Pritchard for efficiently dealing with a large number of complaints from Usk parents. He asked what steps were being taken to ensure that driving standards and the safety of pupils were being regularly reviewed. The Cabinet Member assured Members that officers in the PTU have responsibility to monitor standards on an unannounced regular basis.

21. From County Councillor Paul Pavia to County Councillor Paul Griffiths Cabinet Member for Planning and Economic Development Deputy Leader

Can the Cabinet Member provide an update on what the Council is doing to relieve traffic congestion in and around Chepstow?

The Cabinet Member explained that WG is now undertaking a WELTAG study on the potential design for improvements at High Beech Roundabout. Last month Cabinet colleagues had met with WG Cabinet Secretary Ken Skates and had made the case that the M48 would be far more productive if there was access to it from Rogiet and Caldicot. The Cabinet Secretary wanted to seek ways of making better use of the existing network.

Railways are improving in Chepstow and by the end of the year Transport for Wales will be delivering an hourly service. When the cross-country service is included, there will be a half-hourly service. In addition, next month Transport for Wales will mbe consulting a fares proposal that caps the daily fare in the South Wales region to £7, and weekly fare to £20.

With regards to buses the Cabinet Member commended Newport Bus for their range of new services in the Chepstow area.

As a supplementary County Councillor Pavia sought clarity on funding for WELTAG stage for Chepstow Bypass and asked if funding from Uk Government had been approved and if so when would the tendering process start.

The Cabinet Member explained that earlier this year UK Government allocated £5.9m in support of a range of transport proposals for Chepstow. The administration had responded that they could undertake a large part of the work specified but would seek to direct £500,000 to a joint study with Gloucestershire, not specifically on the Chepstow Bypass but a study on all options for mobility improvement across the Severn Estuary. Since submitting the response, the new UK Government is looking again at the whole funding envelope and the outstanding funding proposals.

22. Date of next meeting - 24th October 2024

The meeting ended at 6.20 pm

Questions (5) for the Full Council meeting on 24th October 2024 from David Cummings , Chair of the Gateway to Wales Action Group.

1. Monmouthshire has set permissible Nitrogen Dioxide levels at four times the levels recommended by the World Health Organisation . Why has MCC chosen a site , close to A40 , to build houses where the extra emissions from cars will further break those WHO levels and also create more PM 2.5 particulates ?
2. The catchment area in which HA4 is located already has phosphate levels exceeding the maxiumus permitted . Why has MCC chosen a site where run off will increase those levels and further pollute the Wye above where the drinking water for our town is extracted ?
3. Site HA4 is primarily Grade 2 prime agricultural land . MCC is bound to use the lowest grade agricultural land first . Why has it not chosen a site with poorer quality agricultural land ?
4. This site is close to the Wye Valley AONB and is the Gateway to Wales. Why have MCC chosen a site that , if developed , despoils and changes a view that has not changed for visitors since the Wye Tour of 1782 ?
5. We ask what assessment has been undertaken of the impact of the additional traffic exiting this site either for access to work via the A40 or into the town?
6. In view of the many issues with site HA4 should not an alternative site be chosen for Monmouth, such as CS0274 off Wonastow Road, which has far fewer issues ? Can the council agree to consider this option during the Deposit Plan consultation process?

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SUBJECT: **DEPOSIT REPLACEMENT LOCAL DEVELOPMENT PLAN (RLDP)**

MEETING: **COUNCIL**

DATE: **24th OCTOBER 2024**

DIVISION/WARDS AFFECTED: ALL

1. PURPOSE:

1.1 The purpose of this report is to seek Council's endorsement of the Deposit Plan to commence statutory consultation/engagement with communities and key stakeholders, and to seek Council's agreement of the RLDP Revised Delivery Agreement to submit to Welsh Government for approval.

2. RECOMMENDATIONS:

2.1 To endorse the Deposit RLDP to commence statutory consultation/engagement with communities and key stakeholders.

2.2 To agree the revised Delivery Agreement for the RLDP for submission to Welsh Government for approval.

3. KEY ISSUES:

Background

3.1 The Council has been preparing a Replacement Local Development Plan (RLDP) for the period 2018 to 2033. The RLDP is a key Council policy document that allocates land for development, designates areas for protection and contains policies to provide the basis for deciding planning applications. It will cover the whole of the County except for the part within Bannau Brycheiniog National Park.

3.2 The existing LDP was adopted in 2014 and covered a ten year between 2011-2021. The adopted LDP is therefore out of date, and it is essential the LDP is replaced to safeguard the County against unacceptable development, allocate

land to deliver essential affordable housing and to support economic prosperity. All of the strategic housing sites in the adopted LDP have been delivered or are currently being built out, therefore there is a lack of land and opportunity to build new homes or to deliver new employment sites. The RLDP will provide the Council with a sound development plan, which will give certainty to communities and developers up to 2033 on which land is appropriate for sustainable development.

3.3 The RLDP identifies land where sustainable forms of development will take place to 2033 and provides an up to date planning policy framework to enable robust decision making on development proposals within the County. It has a key role in delivering the Council's objectives and addressing the core issues of delivering essential affordable homes at pace and scale, responding to the climate and nature emergency, ensuring our communities are socially and economically sustainable by dressing our demographic balance by attracting a younger demographic and supporting the County's economic prosperity. The RLDP takes account of and helps deliver a range of other initiatives, including the land use elements of the Council's Economy, Employment and Skills Strategy, Local Transport Strategy and the Community and Corporate Plan by supporting the delivery of the Council's core purpose of becoming a zero-carbon county, supporting well-being, health and dignity for everyone at every stage of life.

3.4 Figure 1 below shows the key steps in the RLDP process. The Council is currently at Stage 4 in the diagram, and if Council agrees to endorse the Deposit RLDP for public consultation/engagement on 24th October 2024 a six-week consultation period would commence on 4th November until 16th December 2024. Following this consultation period with communities, the RLDP will be reported back to Council (July 2025) to consider the comments received from the public consultation and whether to endorse the RLDP's submission to the Welsh Government to be independently examined by a planning inspector. The planning inspector would review whether the RLDP is 'sound' and can therefore be formally adopted by the Council.

At this stage (4), Council is considering whether to endorse the Deposit RLDP for public consultation to engage with communities and key stakeholders over a six-week period (4th November – 16th December).

Figure 1: Key Steps in the RLDP Process

RLDP Revised Delivery Agreement

3.5 The Delivery Agreement sets out the timetable for delivering the RLDP and the strategy for community involvement. Several challenges have arisen during the development of the RLDP meaning that progress on the preparation of the RLDP has been delayed this includes delays due to the pandemic, new population data being released, the impact of phosphates on development and concerns made by Welsh Government in relation to the level of growth proposed in previous draft Strategies. The most recent delay impacting on the publication of the Deposit RLDP was due to the timing of a UK General Election. As a result of this delay in the publication of the Deposit RLDP, a revised Delivery Agreement has been prepared which sets out an amended timetable for Plan preparation.

3.6 The revised Delivery Agreement, which includes the amended timetable, is attached at **Appendix 2**. Council will consider whether to agree the revised Delivery Agreement for submission to Welsh Government on 24th October 2024.

3.7 The Delivery Agreement must be approved by resolution of the Council and submitted to the Welsh Ministers for agreement in accordance with Regulation 9 of the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 (as amended 2015). Following agreement by the Minister, work will continue on the preparation of the RLDP in accordance with the revised Delivery Agreement.

3.8 The amended timetable sets out the following revised dates for future key stages of the RLDP process.

RLDP Key Stage	Previously Agreed DA Timetable	Revised Date – October 2024
Deposit Plan – Political Reporting	March 2024	October 2024
Deposit Plan – Consultation	April-May 2024	November - December 2024
RLDP Submission to Welsh Government	October 2024	July 2025
Examination	Late 2024/early 2025	September - November 2025
Inspector's Report	June 2025	March/April 2026
Adoption	July 2025	May 2026

Deposit RLDP

3.9 The Deposit RLDP is a 'core' Council document that sets out the strategy, proposals and detailed policies for the future use and development of land in

in Monmouthshire (excluding the area within the Bannau Brycheiniog National Park) over the Plan period 2018 to 2033. It identifies how much sustainable growth is needed and where this growth will be located. Its preparation has been guided by a framework of key inputs that includes national legislation/policy, local and regional policies/strategies and an evidence base relating to key local issues for the Plan to address. The Deposit RLDP seeks to address the issues, challenges and opportunities facing the County, that are documented in the Gwent PSB[1] Well-being Plan (August 2023) and MCC's Taking Monmouthshire Forward – Community and Corporate Plan 2022-2028 (April 2023).

3.10 The Deposit Plan is attached at **Appendix 1**. A summary version of the Deposit RLDP has also been prepared (attached at **Appendix 3).**

3.11 The Councils vision within the Deposit RLDP is that: -

By 2033 Monmouthshire will be home to well-connected exemplar, affordable housing-led, net zero carbon places that provide employment and support demographically balanced sustainable and resilient communities for all, where:

- People are living in inclusive, equal, safe, cohesive, prosperous and vibrant communities. Both urban and rural areas are well-connected with better access to local services and facilities, open space and employment opportunities.
- Communities and businesses are part of an economically thriving, ambitious and well-connected County.
- The best of the County's built heritage, countryside, biodiversity, landscape and environmental assets have been protected and enhanced to retain its distinctive character.
- People enjoy healthier, more sustainable lifestyles with improved access to public transport and active travel opportunities and have a minimised impact on the global environment, supporting our ambitions for a zero-carbon county.

3.12 The Deposit RLDP includes seventeen objectives to achieve this vision and these objectives are grouped to reflect the seven wellbeing goals (they are not listed in order of importance). However, as the Plan has developed, four core objectives have become apparent: delivering essential affordable homes at pace and scale to meet local needs, ensuring our communities are socially and economically sustainable by attracting and retaining younger people to rebalance our ageing demographic, responding to climate and nature emergency and supporting and enabling sustainable economic growth.

[1] The Gwent PSB has been formed by the former five PSBs of Blaenau Gwent, Caerphilly, Newport, Monmouthshire and Torfaen, along with the Aneurin Bevan University Health Board, South Wales Fire and Rescue Service and Natural Resources Wales.

Key Highlights of the Deposit RLDP

3.13 The Sustainable and Resilient Communities Growth and Spatial Strategy:

- Makes provision for approximately 5,400 - 6,210 homes over the Plan period 2018-2033[2]. This includes the provision of approximately 1,595 - 2,000 affordable homes. As there are currently approximately 4,080 homes in the housing landbank[3], land will be allocated for approximately 1,320 – 2,130 new homes, including 660 – 1,065 new affordable homes. These homes will be delivered through various housing land supply components, details of which are set out in Table 2 below, Appendix 7 and the Housing Background Paper.
- Allocates a minimum of 38ha of B use class employment land and sets out the planning policy framework to support job growth of up to 6,240 additional jobs over the Plan period. The Plan also includes policies to facilitate growth in foundational sectors such as retail, leisure, tourism and agriculture. The RLDP is supported by the Council's Economy, Employment and Skills Strategy and Local Transport Strategy. Collectively these key plans/strategies will support sustainable economic growth/job creation through a range of mechanisms and interventions.
- Focuses growth in the County's most sustainable settlements of Abergavenny, Chepstow, Monmouth and Caldicot, including Severnside, as well as some growth in our most sustainable rural settlements to deliver much needed affordable homes and to address rural inequality and rural isolation in these areas. Strategic sites are identified to sustainably expand the Primary Settlements of Abergavenny, Caldicot, Chepstow and Monmouth. Additional site allocations are identified in sustainably located edge of settlement locations in various settlements across the County. These site allocations are set out in policies HA1 to HA18.
- Limits the impact of climate change by ensuring new homes are net zero carbon and well connected with existing settlements, providing attractive and accessible places to live and work.

3.14 Table 1 sets out a summary of the overarching spatial distribution of housing provision for the RLDP.

[2] In accordance with the Development Plans Manual (WG, March 2020) an allowance is made for a 15% flexibility allowance to factor in sites that may not come forward, unforeseen issues or to meet higher aspirations for the County to enable the provision/delivery of additional sites if all sites are delivered.
[3] As the Plan period has already begun (2018) some of the homes in the landbank have been built, are under construction or have planning permission. The landbank figure also takes into account LDP 'rollover' allocations, windfall sites and small sites.

Table 1: Summary of Spatial Distribution of Housing Provision*

				Allocations		
	Completions 2018-2023	**Existing Commit-ments**	**Total Allowances (Small Sites; Windfalls)**	**LDP Rollover Allocations**	**RLDP New Housing Allocations (Dwellings)**	**Total RLDP Housing Provision**
Abergavenny (incl. Llanfoist)	537	29	196	0	600	1,362
Chepstow	448	81	154	0	146	829
Monmouth (incl. Wyesham)	286	70	77	160	330	923
Caldicot (incl. Severnside)	663	555	162	0	810	2,190
Secondary Settlements	109	38	67	0	136	350
Rural Settlements	177	25	231	15**	108**	556
Total	**2,220**	**798**	**887**	**175**	**2,130**	**6,210**

*Figures include an indicative 15% flexibility allowance.
** Rural LDP Rollover Allocations and RLDP New Housing Allocations are all within Tier 3 Main Rural Settlements

3.15 In order to deliver the housing provision identified in Policy S1, the following sites are proposed to be allocated for residential development, and in some instances mixed-use opportunities, in the period up to 2033:

Site Ref	Site Name	Settlement	Site Area (ha)	Approximate No. Homes in Plan Period	Approximate No. Affordable Homes in Plan Period
Strategic Sites (Tier 1 Settlements)					
HA1	Land to the East of Abergavenny*	Abergavenny	35.9	500	250
HA2	Land to the East of Caldicot/North of Portskewett*	Caldicot	64	770	385

HA3	Land at Mounton Road*	Chepstow	12.8	146	73
HA4	Land at Leasbrook	Monmouth	11	270	135
Primary Settlements/Severnside (Tier 1 Settlements)					
HA5	Land at Penlanlas	Abergavenny	6.17	100	50
HA6	Land at Rockfield	Monmouth	1.5	60	30
HA7	Land at Drewen Farm	Monmouth	6.6	110	55
HA8	Tudor Road, Wyesham	Monmouth	2.1	50	25
HA9	Land at Former MoD*	Caerwent	4.2	40	20
Secondary Settlements (Tier 2 Settlements)					
HA10	South of Monmouth Road	Raglan	4.5	54	27
HA11	Land East of Burrium Gate	Usk	2.6	40	20
HA12	Land West of Trem yr Ysgol	Penperlleni	3.4	42	21
Main Rural Settlements (Tier 3 Settlements)					
HA13	Land adjacent to Piercefield Public House	St Arvans	1.1	16	8
HA14	Land at Churchfields	Devauden	1	20	10
HA15	Land East of Little Mill	Little Mill	1.68	20	10
HA16	Land North of Little Mill	Little Mill	0.87	15	8

HA17	Land adjacent to Llanellen Court Farm	Llanellen	1.56	26	13
HA18	Land West of Redd Landes	Shirenewton	1.76	26	13
			Total Units	2,305	1,153

* Mixed-use sites

3.16 The RLDP allocates B use class employment land and sets out the planning policy framework to support job growth of up to 6,240 additional jobs over the Plan period. Strategic Policy S12 sets out the requirement to provide for a suitable range and choice of sites for industrial and business development in the County (classes B1, B2, B8 of the Town and Country Planning Use Classes Order 1987). Overall, the Plan makes provision for approximately 57ha of B use class land (to meet the minimum requirement of 38 ha); this comprises employment land taken up between the period 2018 – 2024 and new employment allocations for the remaining Plan period.

Employment Land Supply

Employment Land Take Up 2018- 2024	Approximately 9ha
Employment Allocations	Approximately 48ha
Total Employment Provision	**Approximately 57ha**

3.17 The following sites are identified for new industrial and business development (Use classes B1, B2 and B8):

Site Ref	**Site Name**	**Area (Ha)**	**Use Class**
Industrial and Business Sites			
EA1a	Land at Nantgavenny Business Park, Abergavenny	0.59	B1
EA1b	Poultry Units, Rockfield Road, Monmouth	1.3	B1
EA1c	Land North of Wonastow Road, Monmouth	4.5	B1, B2, B8
EA1d	Newhouse Industrial Estate, Chepstow	2.5	B1, B2, B8
EA1e	Land adjoining Oak Grove Farm, Caldicot	6	B1, B2, B8
EA1f	Quay Point, Magor	14	B1, B2, B8

EA1g	Rockfield Farm, Undy	3.2	B1
EA1h	Gwent Euro Park, Magor	7	B1, B2, B8
EA1i	Raglan Enterprise Park, Raglan	1.5	B1, B2, B8
EA1j	Land West of Raglan	4.5	B1, B2, B8
Identified Mixed Use Sites			
EA1k	Land to the East of Abergavenny (see Policy HA1 for site specific policy requirements)	1	B1
EA1l	Land at Former MoD Site, Caerwent (see Policy HA9 for site specific policy requirements)	1	B1
EA1m	Land to the East of Caldicot (see Policy HA2 for site specific policy requirements)	1	B1
Total		48.09	

3.18 The Deposit RLDP contains a number of Strategic Policies which form the framework for implementing and delivering the Sustainable and Resilient Communities Growth and Spatial Strategy. These are outlined below.

Strategic Policies:

- S1 – Growth Strategy
- S2 – Spatial Distribution of Development – Settlement Hierarchy
- S3 – Sustainable Placemaking & High-Quality Design
- S4 – Climate Change
- S5 – Green Infrastructure Landscape and Nature Recovery
- S6 – Infrastructure
- S7 – Affordable Housing
- S8 – Site Allocation Placemaking Principles
- S9 – Gypsy and Travellers
- S10 – Employment Sites Provision
- S11 – Rural Economy
- S12 – Visitor Economy
- S13 – Sustainable Transport
- S14 – Town, Local and Neighbourhood centres
- S15 – Community and Recreation Facilities
- S16 – Sustainable Minerals Management
- S17 – Sustainable Waste Management

Under each strategic policy there are detailed Development Management Policies that provide additional planning policy guidance for the determination

of planning applications within the Plan period up to 2033. Planning policies within the Deposit RLDP seek to address and actively respond to the Climate and Nature Emergency by protecting and enhancing Monmouthshire's special and unique spaces, heritage assets, landscapes and biodiversity. There are also planning policies to support economic prosperity by safeguarding industrial/commercial areas, support the vitality and attractiveness of our town centres with a town centre 'first approach' and support sustainable tourism within the County. The Plan also designates areas for protection, including green wedges and areas of amenity importance.

Supporting Documents

3.19 The Deposit Plan has been subject to an Integrated Sustainability Appraisal (ISA) incorporating Strategic Environmental Assessment (SEA), Well-being of Future Generations Assessment (WBFGA), Health Impact Assessment (HIA), Equality Impact Assessment (EqIA) and Welsh Language Impact Assessment (WLIA). The ISA assesses the extent to which the proposals and policies will help to achieve the wider environmental, economic, social and cultural objectives of the RLDP. The Deposit RLDP has also been subject to a Habitats Regulations Assessment (HRA).

3.20 The Integrated Sustainability Appraisal Report and Habitats Regulations Assessment of the Deposit RLDP are published in Appendices 4 and 5 respectively. The ISA and HRA are iterative processes and are updated as the RLDP progresses towards adoption.

3.21 The Deposit RLDP (Appendix 1) also includes the Infrastructure Delivery Plan table, setting out what is needed to support the development of the allocated housing sites.

3.22 The Council has carefully considered the responses we received to the consultation on the Preferred Strategy that was conducted December 2022 - January 2023. Council endorsed post consultation updates to the preferred strategy on 26th October 2023. An Initial Consultation Report is attached in Appendix 6, which set outs a summary of the representations received to the consultation on the Preferred Strategy and Candidate Sites Register, together with commentary from the Council on these consultation responses.

3.23 The Candidate Site Assessment Report provides information on the candidate sites assessment methodology and the rationale as to why sites have been included or excluded from the Deposit RLDP. The Assessment can be found in Appendix 7.

3.24 As part of the development plan process the Council needs to demonstrate that the Plan is 'sound'[4]. A Self-Assessment of the Deposit Plan against the

[4] Development Plans Manual (Edition 2 – March 2020).

Tests of Soundness has been undertaken and is considered to demonstrate that the Deposit Plan and the processes followed to reach this stage are 'sound' (attached at Appendix 8). The soundness of the RLDP will continue to be assessed against the tests of soundness as the Plan progresses to an independent Examination by a Planning Inspector subject to Council agreement.

3.25 The self-assessment also demonstrates that the RLDP aligns with the objectives of Future Wales and establishes a policy framework that is in general conformity with Future Wales and makes a positive contribution to its policy aims. At a local and regional level, the RLDP is well-placed to implement the vision and objectives of Future Wales by ensuring that it includes policies that adhere to principles of placemaking and sustainable development.

Consultation, Engagement and Stakeholder Involvement

3.26 Regulation 17 of The Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 (as amended 2015)) requires the Council to publish its Deposit RLDP proposals for public consultation prior to determining the content of the RLDP for submission to WG. Subject to endorsement by Council, the Deposit RLDP will be subject to statutory engagement and consultation for a six-week period between Monday 4th November 2024 and Monday 16th December 2024, whereby communities and stakeholders will be invited to comment on the content of the Deposit RLDP. The consultation and engagement will be carried out in accordance with the procedures set out in the Delivery Agreement's Community Involvement Scheme (Appendix 2). This will be done by:

- Direct contact with statutory consultees and those stakeholders who have asked to be included on the RLDP database (1000+ contacts) (contact and language preference are as indicated by the stakeholder through consultation).
- Through use of social media platforms including via Monmouthshire County Council's X and Facebook accounts.
- Engagement with Members through specific workshops, Member drop-in sessions and in reports to appropriate Council meetings.
- Engagement with Town and Community Councils
- All RLDP information and documents will be made available on the Council's website, which will be updated regularly.
- Deposit of Deposit Plan documents at the Council's headquarters and Community Hubs, where possible.
- Press releases for the local media, where appropriate.
- Producing summary documents for key stages of the RLDP process.
- Public information exhibitions, engagement sessions ('drop-in sessions') and meetings in accessible and neutral locations.
- Virtual engagement and consultation via web based technological tools.

- Site notices will be displayed regarding proposed land allocations at Deposit stage and letters will be sent to adjacent properties (excluding Candidate Sites submitted as these relate to submissions for consideration rather than proposals).

Next Steps

3.27 Feedback from the Place Scrutiny Committee will be reported to Council on 24th October 2024. If Council endorses the Deposit RLDP to be issued for statutory consultation/engagement, this will take place over a six-week period from 4th November 2024 – 16th December 2024. It is worth noting that, prior to the consultation starting, the documents will have been in the public domain from 3rd October 2024 as part of this published Scrutiny Committee agenda. The consultation and engagement will be carried out in accordance with the procedures set out in the Delivery Agreement's Community Involvement Scheme (October 2024). Key aspects of the engagement/consultation on the Deposit RLDP include:

- Direct contact with statutory consultees and those stakeholders who have asked to be included on the RLDP database (1000+ contacts);
- Nine Drop-in Sessions during the consultation period (November – December 2024) as follows:

Venue	**Date**	**Time**
Raglan Old Church School Community Centre, Chepstow Road, Raglan	Tuesday 12th November 2024	2pm – 7pm
Abergavenny Market Hall, Cross Street, Abergavenny	Thursday 14th November 2024	2pm – 7pm
Usk Community Hub, Maryport Street, Usk	Monday 18th November 2024	2pm – 7pm
Magor Baptist Chapel, The Square, Magor	Wednesday 27th November 2024	2pm – 7pm
Portskewett Recreational Hall, Manor Way, Portskewett	Friday 29th November 2024	2pm – 7pm
Caldicot Town Council Building, Sandy Lane, Caldicot	Wednesday 4th December 2024	2pm – 7pm
Goytre Village Hall, Newton Road, Penperlleni	TBC	2pm – 7pm
Palmer Centre, High Street, Chepstow	TBC	2pm – 7pm
Shire Hall, Agincourt Square, Monmouth	TBC	2pm – 7pm

- Two virtual events open to all during the consultation period[5]:
  - Wednesday 13th November 2024, 2pm – 3.30pm
  - Monday 9th December 2024, 6pm – 7.30pm

[5] These events will be recorded and available to view on the Council's website

- Virtual event for Town and Community Councils Tuesday 5th November 2024, 6pm – 7.30pm;
- Engagement with the pupils at the County's four comprehensive schools.

3.28 Following consultation on the Deposit RLDP, the Council will consider all comments received from the consultation, including any necessary amendments, and whether to endorse the Plan for submission to the Welsh Government (July 2025), who will arrange for an independent planning inspector to be appointed to conduct an examination in public (September – November 2025).

3.29 Following the examination, the Inspector will issue a report recommending any required changes to the RLDP (March/April 2026). If the Inspector considers the Plan is fundamentally unsound it will not be recommended for adoption. The conclusions reached by the Inspector will be binding and unless the Welsh Government intervenes, the Council must accept the changes and adopt the RLDP as amended. Once adopted, the RLDP will replace the existing LDP adopted and will become the framework against which decisions on planning applications are made until 2033.

4. EQUALITY AND FUTURE GENERATIONS EVALUATION (INCLUDES SOCIALJUSTICE, SAFEGUARDING AND CORPORATE PARENTING):

4.1 The Planning and Compulsory Purchase Act (2004) sets out the requirement for all LDPs to be subject to a Sustainability Appraisal (SA). All stages of the RLDP are subject to an Integrated Sustainability Assessment (ISA) (including Strategic Environmental Assessment (SEA), Well-being of Future Generations (WBFG), Health Impact Assessment (HIA), Equality Impact Assessment (EqIA), and Welsh Language Impact Assessment (WLIA)). The ISA Report is attached in **Appendix 4**. The ISA findings have informed the Deposit RLDP including the detailed policies and site allocations in the plan, in order to ensure that the Plan promotes sustainable development.

4.2 An Equality and Future Generations Evaluation (including equalities and sustainability impact assessment) is attached to this report at **Appendix 9.**

Safeguarding and Corporate Parenting

4.3 There are no safeguarding or corporate parenting implications arising directly from this report. The RLDP will provide affordable homes, delivery and allocation of which should be cognisant of the needs of children leaving care.

Socio-economic Duty

4.4 The RLDP seeks to tackle inequality, specifically by seeking to address house price unaffordability, which currently prevents some of our communities accessing suitable homes within the County. This is likely to benefit younger people, who in turn will make our ageing communities more socially and economically balanced and more sustainable. Good quality and affordable homes are important in achieving poverty reduction and equitable prosperity and supporting the best start in life. Good spatial planning helps to build cohesive communities. The provision of affordable homes combined with policy interventions in relation to the requirement of a mix of market housing will increase opportunities for those in poverty to access safe, secure and suitable homes. In accordance with the WBFGA, the RLDP also seeks to prevent future problems and will therefore continue to avoid new development in flood risk areas and will ensure the delivery of net zero carbon homes to help address the climate and nature emergency and also tackle issues such as fuel poverty.

5. OPTIONS APPRAISAL

Deposit RLDP

Option	Benefit	Risk	Comment
Council endorses the Deposit RLDP for statutory consultation for six weeks from 4th November to 16th December 2024, alongside the Integrated Sustainability Appraisal (ISA) and Habitats Regulations Assessment (HRA) and agrees the revised Delivery Agreement for submission to Welsh Government for approval.	By endorsing the Deposit RLDP, Council will allow the RLDP to progress and allow an opportunity for public engagement. By agreeing the revised Delivery Agreement (DA), Council will allow its submission to Welsh Government for approval which will enable the RLDP to progress in accordance with the DA.	That notwithstanding Council's decision, Welsh Government do not approve the revised Delivery Agreement.	This is the preferred option. The Deposit RLDP, as drafted, is considered to promote an appropriate level and spatial distribution of housing and employment growth for the County to 2033, which will assist in delivering the Council's objectives and addressing the core issues of delivering essential affordable homes, responding to the climate and nature emergency by delivering net zero carbon homes in exemplar places, supporting economic

Option	Benefit	Risk	Comment
			prosperity, and ensuring our communities are socially and economically sustainable by attracting and retaining younger people to rebalance our ageing demographic. Every effort has been made to ensure the RLDP DA is realistic.
Council do not endorse the Deposit RLDP for consultation, and/or do not agree the revised Delivery Agreement for submission to Welsh Government for approval.	None	Timely progress is not made to deliver the RLDP and to address priority objectives including the delivery of urgently needed affordable housing, addressing the climate and nature emergency, supporting economic growth and addressing our unbalanced demography. The Adopted LDP's planning policy framework is out of date and there is a lack of available land to provide affordable housing and job opportunities.	This option would have significant negative implications.

6. RESOURCE IMPLICATIONS

6.1 Officer and consultant time and costs associated with the preparation of the revised Deposit Plan will be met from the Planning Policy budget and existing LDP reserve.

6.2 The essential infrastructure requirements for the allocated housing sites are identified in the Deposit RLDP. Although it is expected that the infrastructure would be funded via S106 planning contributions from the developers and site promoters, there may be some instances over the lifetime of the plan that there is a requirement for Council expenditure to assist in providing some infrastructure or in bringing some sites forward. This might include accessing public funding streams, the use of Compulsory Purchase Orders (CPO) and/or potential commercial investment to provide 'shovel ready' sites or business premises. Future Wales 2040 Policy 3 which supports public leadership and the use of public land to deliver affordable housing and delivering economic prosperity within the County.

7. CONSULTEES

- Cabinet Member for Planning and Economic Development & Deputy Leader
- SLT
- Communities and Place DMT
- Member workshops 17th September, 26th September & 2nd October 2024
- Place Scrutiny Committee 10th October 2024. Feedback from Place Scrutiny Committee is attached at **Appendix 10**.

8. BACKGROUND PAPERS

Include:

- RLDP Preferred Strategy Post consultation updates (October 2023)
- Initial Consultation Report (October 2024)
- Monmouthshire RLDP Integrated Sustainability Appraisal (ISA) Report; Monmouthshire RLDP ISA Report Non-Technical Summary; Monmouthshire RLDP ISA Technical Annex Candidate Sites.
- HRA of the Monmouthshire RLDP Deposit Plan (AECOM, September 2024)
- RLDP Delivery Agreement (Revised October 2024)

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APPENDICES:

APPENDIX 1: Monmouthshire Deposit RLDP and Proposals Map Inset Maps

APPENDIX 2: Monmouthshire Delivery Agreement (Revised October 2024)

APPENDIX 3: Monmouthshire Deposit RLDP Summary

APPENDIX 4: Monmouthshire RLDP Integrated Sustainability Appraisal (ISA) Report; Monmouthshire RLDP ISA Report Non-Technical Summary; Monmouthshire RLDP ISA Technical Annex Candidate Sites.

APPENDIX 5: Habitats Regulations Assessment of the Monmouthshire RLDP Deposit Plan

APPENDIX 6: Initial Consultation Report

APPENDIX 7: Candidate Sites Assessment Report

APPENDIX 8: Self-Assessment of the Deposit Plan against the Tests of Soundness

APPENDIX 9: Equality and Future Generations Evaluation

APPENDIX 10: Place Scrutiny Committee - Summary of the meeting held on 10th October 2024

APPENDIX 1

Replacement Local Development Plan 2018-2033

monmouthshire
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List of Proposals Plan Inset Maps

*For maps see separate document – **Replacement Local Development Plan 2018 - 2033 Proposals Plan Inset Maps***

Primary Settlements:

- Abergavenny (inc. Llanfoist)
- Chepstow
- Monmouth (inc. Wyesham)
- Caldicot (inc. Severnside Area comprising of: Caerwent, Crick, Magor Undy, Portskewett, Rogiet and Sudbrook)

Secondary Settlements:

- Penperlleni
- Raglan
- Usk

Main Rural Settlements:

- Devauden
- Dingestow
- Little Mill
- Llandogo
- Llanellen
- Llangybi
- Llanover
- Llanvair Discoed
- Mathern
- Pwllmeyric
- Shirenewton/ Mynyddbach
- St Arvans
- Tintern
- Trellech
- Werngifford/Pandy

Introduction

1. Replacement Local Development Plan

1.1.1 The Council is preparing a Replacement Local Development Plan (RLDP) for the County (excluding the area within Bannau Brycheiniog National Park), covering the period 2018 to 2033[1]. The RLDP is a key Council policy document that allocates land for development, designates areas for protection and contains policies against which future planning applications will be assessed. When adopted, the RLDP will replace the existing adopted LDP as the statutory land use development plan for the County.

1.1.2 The RLDP will identify where and how much new, sustainable development will take place to 2033, underpinned by a clear and robust evidence base. The Council has set fundamental objectives for its RLDP:

- Providing essential affordable at pace and scale.
- Responding to the climate and nature emergency by delivering net zero carbon new homes in exemplar places.
- Ensuring our communities are socially and economically sustainable by attracting and retaining younger people to rebalance our ageing demographic.
- Providing homes that are integral parts of existing settlements, with walking routes to town/local centres, benefiting from and adding to the vibrancy of those settlements.

1.1.3 The RLDP takes account of and helps deliver a range of other initiatives, including the land use elements of the Council's Economy, Employment and Skills Strategy, and Community and Corporate Plan by supporting the delivery of the Council's core purpose of becoming a zero-carbon county, supporting well-being, health and dignity for everyone at every stage of life[2].

1.1.4 The RLDP has been prepared with regard to relevant legislation, national planning policy and regional/local strategies. The Plan's strategy, policies and proposals have been informed by a robust evidence base in the form of various background reports and supporting studies relating to key local issues for the Plan to address (Appendix 1 refers).

[1] As required by the Planning and Compulsory Purchase Act 2004
[2] The Community and Corporate Plan 2022 sets out the Council's core purpose, principles, and priorities. It was adopted by Council on 20th April 2023.

The RLDP Process

1.1.5 The preparation of the RLDP involves a number of key stages as shown in Figure 1 above, and has proceeded through stages 1 – 3, with this Deposit Plan being the current stage. The Plan

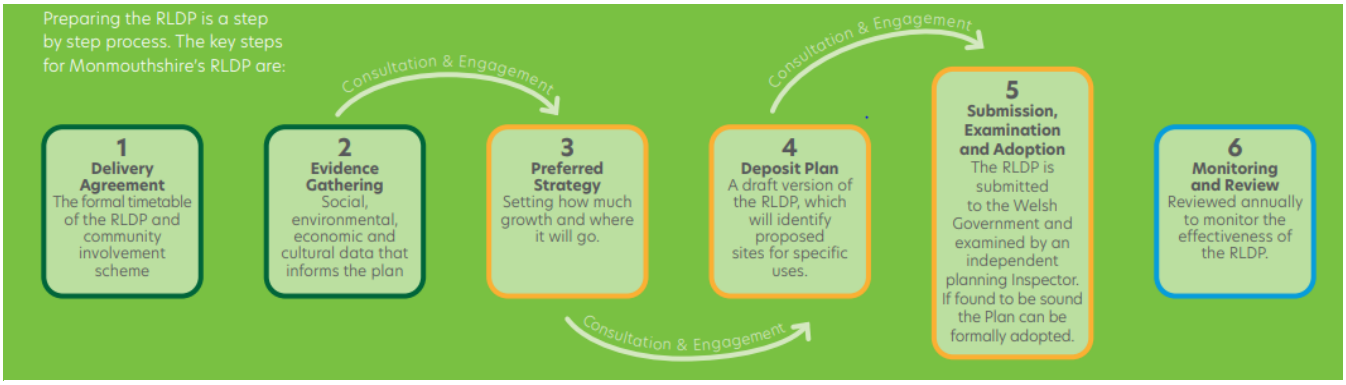


Figure 1: Replacement Local Development Plan Process

is being prepared in accordance with the Revised Delivery Agreement (October 2024) which sets out the timetable for Plan preparation and the approach to community consultation and engagement.

1.1.6 The RLDP has been through a number of key plan stages since Plan commencement in 2018. An overview of progress and key considerations at each stage is provided in Appendix 2. Several challenges have arisen, affecting progress and requiring further consideration at the relevant stage. These challenges include the publication of updated Welsh Government 2018-based population projections, the Covid-19 pandemic, an objection from Welsh Government to the June 2021 Preferred Strategy, and phosphate water quality issues in the River Wye and River Usk catchment areas. This Deposit Plan has been prepared having regard to the challenges experienced whilst also ensuring the RLDP delivers on its Vision and Objectives.

What is the Deposit RLDP?

1.1.7 This Deposit Plan is a key stage in the preparation of the Development Plan for Monmouthshire[3]. It progresses the evidence gathering, stakeholder engagement and Pre-Deposit work undertaken to date, including the Preferred Strategy consultation, and sets out the strategy, proposals and detailed policies for the future use and development of land in Monmouthshire over the period 2018-2033.

1.1.8 The Deposit Plan consists of a written statement detailing the policies and proposals, along with a proposals map on a geographical base. Its structure and format is as follows:

- Executive Summary
- Introduction: Sets out background information with regard to the Deposit RLDP.
- Context: Provides a broad introduction to the plan area, outlining the key economic, environmental and social characteristics of Monmouthshire.

[3] Regulation 17 of the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 (as amended 2015)

- **Key Issues, Challenges and Opportunities** - Provides a summary of the key issues, challenges and opportunities within Monmouthshire.
- **RLDP Strategic Framework:** Outlines the RLDP Vision and Objectives which have emerged from the Pre-Deposit Plan making process, sets the context for the Plan's strategic direction, and details the growth and spatial strategy for Monmouthshire.
- **Implementation and Delivery:** Sets out the RLDP strategic policies, site allocation policies and detailed development management policies. This policy framework provides the basis for the rational and consistent consideration of planning applications and appeals.
- **Monitoring Framework:** Identifies key policy indicators and targets which will be used to assess the effectiveness of the RLDP. This will provide a basis for the RLDP annual monitoring reports (AMR).
- **Appendices:** A number of appendices are included which set out further detail in relation to a variety of matters. These appendices form part of the RLDP and have been referenced throughout the main document as appropriate.

1.1.9 The Deposit RLDP is also accompanied by the following maps:

- **Proposals Map:** This illustrates the geographical location and extent of the site-specific development and protection policies that are designated in the RLDP.
- **Constraints Map:** This shows the geographical location and extent of constraints to development that are created by legislation outside of the development plan process, for example Scheduled Ancient Monuments, flood plains and Sites of Special Scientific Interest. Although this does not form part of the RLDP regard must be given to the Constraints Map in the consideration of development proposals. The Constraints Map includes designations made by statutory bodies other than the Council and will be updated as necessary.

1.1.10 Further information on the plan preparation process is set out in the Delivery Agreement and the Council's Planning Policy webpages.

1.2 Statutory Assessments:

Integrated Sustainability Assessment

1.2.1 **All formal stages of the RLDP, including the Deposit Plan, are subject to an Integrated Sustainability Appraisal (ISA)** which fulfils the requirements and duties for Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA), Equalities Impact Assessment (EqIA), Health Impact Assessment (HIA), Welsh Language Impact Assessment (WLIA) and Well-being of Future Generations (WBFG). The aim of ISA is to inform and influence the plan-making process by **assessing the extent to which the Plan's proposals and policies will help to achieve the wider environmental, economic, social and cultural objectives of the RLDP.**

1.2.2 The ISA has facilitated a rigorous and iterative assessment of the sustainability issues, challenges and opportunities facing Monmouthshire. As such, the ISA was central to the development of the Issues and Objectives, Preferred Strategy and has informed the detailed policies and proposals set out in the Deposit Plan. Through this approach, the ISA for the RLDP seeks to maximise the development plan's contribution to sustainable development.

Habitats Regulations Assessment

1.2.3 The Council is also required to undertake a Habitats Regulations Assessment (HRA) of the RLDP[4]. The HRA must determine the likely significant effects of the Plan, either individually or in combination with the effects of other plans and projects, on European sites of nature conservation importance and if applicable, scope what needs 'appropriate assessment' (AA) and how it will be undertaken. European sites of nature conservation importance are defined as Ramsar sites (wetlands of international importance), Special Protection Areas for birds (SPAs) and Special Areas of Conservation (SACs).

1.2.4 The HRA is prepared alongside the RLDP as an integrated and iterative process and has an important role in the preparation of the Plan. Accordingly, the RLDP sets out policies and proposals which ensure that the requirements of the regulations are satisfied, and that the integrity of the European Designated sites are not adversely affected.

1.2.5 The key stages in the preparation of the ISA and HRA can be found within the Integrated Sustainability Report and the Habitats Regulations Assessment of the Deposit Plan which are published alongside the Deposit Plan. The ISA and HRA are iterative processes and will be updated as the RLDP progresses towards adoption.

Welsh Language

1.2.6 In accordance with national guidance, an important element of Sustainable Placemaking in Wales involves consideration of the needs and interests of the Welsh language. The Welsh language is part of the social and cultural fabric of Wales. There are, however, significant variations in its use across the Country. Monmouthshire has a relatively low proportion of population that speak, read and write Welsh (6.6% in 2021) compared with other local authorities in Wales, and the Welsh average (13.8% in 2021). Furthermore, Monmouthshire does not currently have any areas with a notable concentration of Welsh speakers. Subsequently, it is not considered necessary for the RLDP to contain a specific policy to address the Welsh language. The Council will, however, seek to ensure the protection and enhancement of Monmouthshire's cultural heritage which will be promoted through the RLDP. National planning policy provides advice regarding the consideration of the Welsh language in development and will be taken into account in the determination of planning applications, where appropriate.

1.2.7 The Monmouthshire Welsh Education Strategic Plan (WESP) provides detail on the promotion of greater opportunities for children, residents of all ages and the workforce to learn and speak Welsh. Monmouthshire has Welsh medium primary schools in Abergavenny, Caldicot and Monmouth (Monmouth is using a seedling school model from September 2024). The RLDP nevertheless supports the aims of the WESP and will support steps taken within proposals to safeguard and grow the use of the Welsh language. Policy S6 relating to infrastructure includes consideration of and appropriate provision of facilities to support the Welsh Language.

Supporting Documents

1.2.8 The Deposit Plan is informed by a robust and credible evidence base which includes a number of studies, assessments and background documents as listed in Appendix 1. These have

[4] Under Part Iva of the Conservation (Natural Habitats, &C.) (Amendment) (England and Wales) Regulations 2007

informed the policies and proposals set out in the RLDP and should be read alongside the Deposit Plan. Only the main findings of these documents are highlighted in this Deposit Plan given the significant amount of data/information they contain. These key documents are referenced in the relevant sections of the LDP and can be viewed on the Council's website.

1.2.9 An Initial Consultation Report has been prepared[5] which summarises the main issues arising from the Preferred Strategy consultation and identifies how these will be addressed. This key consultation stage, involving a wide range of stakeholders, has influenced the preparation of the Deposit Plan.

1.2.10 The Deposit Plan is also accompanied by an Infrastructure Delivery Plan (Appendix 8), setting out what is needed to support the development of the allocated sites, as well as an updated Local Transport Strategy and an Economy, Employment and Skills Strategy. Together, these Plans seek to deliver on the Council's economic ambition and its core purpose of becoming a zero-carbon county, supporting well-being, health and dignity for everyone at every stage of life.

1.2.11 A Candidate Sites Assessment Report is also published alongside the Deposit Plan. This sets out the findings of the candidate site assessment process undertaken as part of the RLDP process and identifies those candidate sites that are suitable for allocation in the RLDP.

Using this Document

1.2.12 The RLDP should be read as a whole given that many of the Plan's objectives and policies are cross-cutting and interrelated. Decisions on development proposals must have regard to the relevant policies in the RLDP and the requirements of national planning policy.

1.2.13 The RLDP does not generally repeat national planning policies as set out in Future Wales, Planning Policy Wales (PPW) and Technical Advice Notes (TANs). National planning policies, along with the RLDP, represent a material planning consideration in the determination of planning applications and regard should be had to them in consideration of development proposals. Where appropriate, this document explains where and how national planning policies apply.

Community & Stakeholder Engagement and Consultation on the Deposit Plan

1.2.14 The Deposit Plan will be the subject of community and stakeholder engagement and consultation. Full details of all the consultation/engagement events and methods on how to comment on the Deposit Plan are available to view on the Council's website.

Next Steps

1.2.15 Following consultation and stakeholder involvement on the Deposit Plan and consideration of the issues raised, the Council will submit the Deposit RLDP and accompanying documents to the Welsh Government who will appoint an independent Inspector to examine the RLDP[6]. Having regard to the evidence and representations received during the Deposit consultation,

[5] Regulation 16a of the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 (as amended 2015)

[6] Regulation 22 of the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 (as amended 2015)

the Inspector must determine whether the RLDP accords with the 'tests of soundness' set out in the Development Plans Manual.

1.2.16 Following the Examination, the Inspector will issue a report recommending any necessary changes to the RLDP. The Inspector's report will be binding and unless the Welsh Government intervenes, the Council must accept the changes and adopt the RLDP as amended. Once adopted, the RLDP will replace the existing Adopted LDP and will become the framework against which decisions on planning applications are made.

Context

2. Monmouthshire Profile and Overview

2.1.1 This section provides a broad introduction to the Plan area, outlining the key economic, social, environmental and cultural characteristics of Monmouthshire. Of note, the Initial Sustainability Appraisal Scoping Report also sets out a full list of policies, plans, programmes and strategies relevant to the RLDP.

Geographical Context

2.1.2 Located in South East Wales, Monmouthshire occupies a strategic position between the major centres in South Wales, the South West of England and the Midlands. Monmouthshire covers an area of approximately 88,000 hectares (880 square kilometres), of which 3% is defined as 'built on'[7]. Monmouthshire has an estimated population of 92,961[8], of which around 7% reside within the Bannau Brycheiniog National Park area of the County. The County is bordered by a number of Welsh Local Authorities; Newport City Council to the south-west, Torfaen County Borough Council to the west and the Bannau Brycheiniog National Park Authority to the north-west. It is also bordered by a number of English Local Authorities; Herefordshire Council to the north-east, South Gloucestershire Council and the Forest of Dean District Council to the east, with links to South Gloucestershire via the Severn Bridge.

2.1.3 The County has a distinctive identity arising from its location in the borderlands between England and the industrial heartland of South Wales. An integral element of Monmouthshire's distinctive settlement pattern arises from its historic market towns and villages and their relationship with the surrounding rural areas. The County has a rich and diverse landscape stretching from the coastline of the Gwent Levels in the south of the County, to the uplands of the Bannau Brycheiniog National Park to the north-west and the river corridor of the Wye Valley National Landscape (AONB).

2.1.4 Located at the gateway to Wales and the Cardiff Capital Region, the County is easily accessible from the rest of Wales and England using a number of strategic routes including the M4 and M48 motorways, the Heads of the Valleys road (A465), the A449, A40 and A4042. Monmouthshire also has four railway stations at Caldicot, Chepstow and Severn Tunnel Junction in the south of the County, and, Abergavenny in the north. These provide rail links to the key settlements of Newport, Cardiff and to west Wales, as well as to Bristol, London, Gloucester, Cheltenham, the Midlands and Manchester. An additional walkway rail station is proposed at Magor with Undy.

Settlement Pattern

2.1.5 The Primary Settlements of Abergavenny, Caldicot, Chepstow and Monmouth, offer a wide range of opportunities for employment, shopping, leisure, community facilities and sustainable and active travel. Our towns offer a rich heritage and attractive lifestyles –

[7] Corine Landcover Inventory
[8] 2021 Census

incentivising economic investment, attracting visitors and providing a focus for public investment in schools, healthcare and leisure services.

2.1.6 Outside of these areas, additional opportunities are found at the wider Severnside area and in the Secondary Settlements of Penperlleni, Raglan and Usk, and in a number of smaller rural settlements. Further details on individual settlements and the settlement hierarchy are provided in the Sustainable Settlement Appraisal which has been developed to identify those settlements which are best suited to accommodate future growth in terms of their location, role and function.

Natural And Built Environment

2.1.7 Monmouthshire is renowned for its beautiful landscapes and biodiversity resource. As a largely rural County, Monmouthshire has significant landscape resources and is home to internationally and nationally designated landscapes ranging from the Wye Valley National Landscape (AONB) to the east and the Bannau Brycheiniog National Park and the Blaenavon Industrial World Heritage Site to the north west. It has substantial biodiversity and nature conservation resources, a number of which are internationally or nationally recognised, including the Severn Estuary which is designated as a Special Area for Conservation (SAC), Special Protection Area (SPA), Site of Special Scientific Interest (SSSI) and a Ramsar Site. The County is also home to four other SACs, namely the River Wye, the River Usk, the Wye Valley Woodlands and the Wye Valley Bat Sites. These are supplemented by a rich resource of nationally designated Sites of Special Scientific Interest (SSSIs) and non-statutory locally identified designations, including Sites of Importance for Nature Conservation (SINCs) and Regionally Important Geodiversity Sites (RIGS).

2.1.8 The Monmouthshire RLDP area also has a rich built heritage and historic environment which includes 31 Conservation Areas, 48 Historic Parks and Gardens, 3 Landscapes of Outstanding Historic Interest, approximately 164 Scheduled Ancient Monuments and 2,145 Listed Buildings. There is a need to protect, promote and enhance the best of our landscape and heritage which are an important part of Monmouthshire's culture and play a key role in tourism and economic growth.

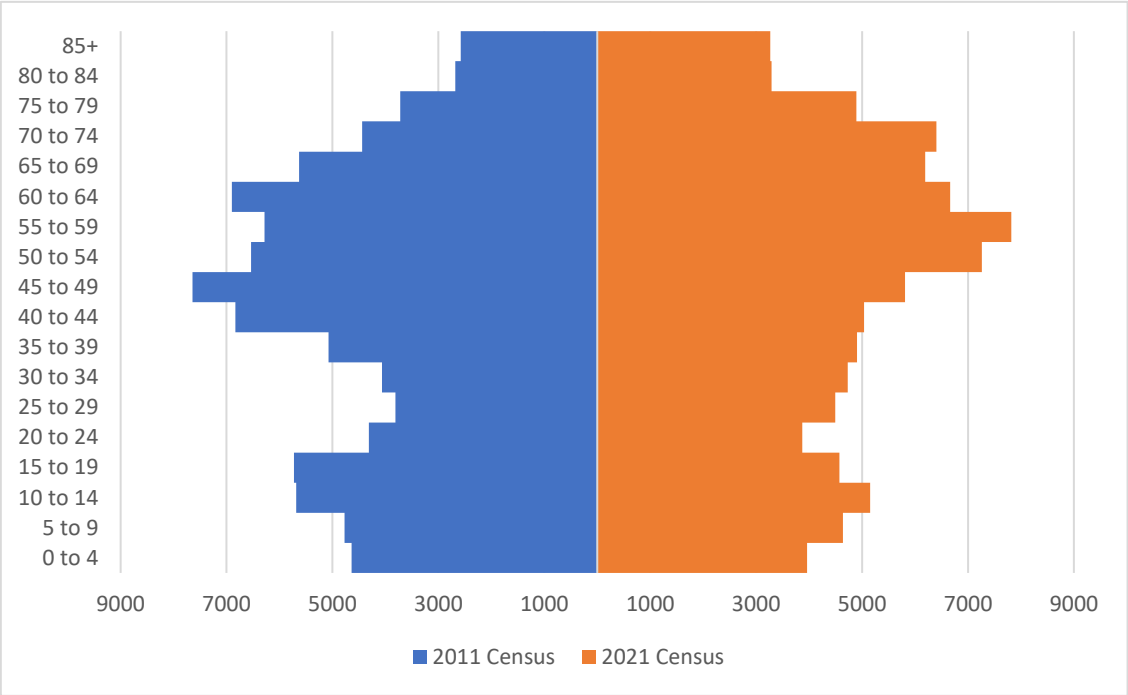
Population

2.1.9 Monmouthshire has a population of 92,961 based on the 2021 Census. As a predominantly rural county, the four primary settlements of Abergavenny (including Llanfoist), Caldicot (including Severnside), Chepstow and Monmouth (including Wyesham) account for over half of the population between them at approximately 64%.

2.1.10 In terms of population make-up, Monmouthshire has a median age of 49 years compared to 34 years in Cardiff, and has a significantly higher proportion of older age groups (65+) and a lower proportion of young adults (16-44) compared to the Welsh average. The proportion of our population aged 65+ and 85+ is increasing well in excess of the Welsh average. The 2021 Census shows that the population aged 65+ has increased by 26% since 2011, which compares to a Welsh average of 18%. For the County as a whole, the 2021 Census identifies that nearly 26% of the population is over 65 (compared to 21% in Wales), with 16% under 16 (18% in Wales) and just over 58% in the working age population group (16-64) (61% in Wales). Of note, between 2011 and 2021 the working age population and school aged population decreased

by 3.3% and 7.3% respectively[9]. This demonstrates the continuing trend for an ageing demographic in the County which is one of the key issues that Monmouthshire is facing. However, this differs by settlement across the County. The change in the population profile of Monmouthshire in the past 10 years is shown clearly in the population pyramid below.

Change in Population Profile between the 2011 and 2021 Census



2.1.11 The relative absence of young adults is often linked to the affordability of housing across the County. Average house prices in the County are high at £400,496 when compared to the Welsh average of £238,871 (Hometrack, May 2024)[10]. House prices are also high in relation to earnings and there is a pressing need for additional affordable housing in the County in both urban and rural areas to assist in ensuring a more balanced population. The issue of affordability also impacts on the ability of young people in the County being able to form their own households. The 2021 Census shows a 14% increase in households with non-dependent children, which indicates that children have to live with parents for longer.

Economy

2.1.12 As the gateway to Wales, Monmouthshire is geographically well connected in a key strategic location with good transport infrastructure linking to the wider region. The County enjoys close proximity to the key growth areas of Cardiff, Bristol, Newport and the Midlands and is only a 45 minute drive to Cardiff and Bristol airports. It is the most competitive economy in Wales after Cardiff and is predicted to have the fastest GVA growth per capita in Wales (UK Competitiveness Index 2023).

[9] Between 2011 and 2022 the school age population declined from 11,606 to 10,756 and the working age population declined from 56,037 to 54,194.

[10] Based on sales and valuations over six month period October 2023 – March 2024. Sales only over same period related to £360,465 for Monmouthshire and £230,710 for Wales. Data accessed on 13/05/2024.

2.1.13 Monmouthshire's location between Cardiff and Bristol makes it an attractive proposition for economic growth and prosperity. Monmouthshire benefits from being a key partner in numerous regional partnerships including the Cardiff Capital Region City Deal, Marches Forward Partnership and The Western Gateway. Opportunities associated with such partnership working include economic investment/innovation and transport and digital connectivity. Further details are provided in Appendix 3.

2.1.14 The January 2023 – December 2023 ONS Annual Population Survey indicated that over 80% (80.2%) of Monmouthshire's working-age population were economically active, higher than the figure for Wales, at 77%. The proportion of the economically active of working age unemployed in Monmouthshire was 3.3% compared to 3.7% in Wales. Our residents are also among the best qualified in Wales.[11]

2.1.15 The Council's ambitions for sustainable economic growth and prosperity are set out in the Economy, Employment and Skills Strategy which strives to foster a diverse, fairer, greener and circular economy, generating sustainable employment growth and creating conditions for shared prosperity, focusing on four priority areas – Place, People, Enterprise and Infrastructure. The RLDP has a key role in supporting /delivering the ambitions and objectives of the strategy, including ensuring a supportive policy framework to facilitate economic growth in a range of sectors and identifying sufficient land to enable the growth in B Use Class Sectors.

2.1.16 The analysis underpinning the County's Economic Strategy indicate that the County's economy is constrained by a lack of capacity. At present over 99% of available businesses premises are in use. The rate of unemployment is around 3%. In order to achieve economic growth the County needs an increased supply of employment land and labour.

2.1.17 The ONS 2023 Annual Population Survey reveals that 65% of residents who are employed work within the County. There is substantial movement of people in and out of the County: 17,100 commuting out of the area and 14,100 commuting into the area (2021)[12]. Of those commuting out for employment nearly 27% were commuting to the City of Bristol and a further 21% to other areas in England. Welsh Government's Building Better Places response to Covid-19 acknowledges that the tendency for people to work from home is likely to continue longer term, with Welsh Government ambition being for 30% of the workforce to work remotely on a regular basis.[13]

2.1.18 An Employment Monitoring Report [14] is prepared annually which assesses take-up of allocated employment land in the adopted LDP's Identified Industrial and Business Sites (Policy SAE1) and Protected Employment Sites (Policy SAE2). The results from this annual survey help to inform future employment land requirements. As of March 2023, of the 50.12ha of allocated SAE1 sites in the Adopted LDP, just over 40 hectares of land remained available for B1, B2 and B8 uses. The employment land take-up rate has averaged 1.8 hectares per annum since the adoption of the LDP in 2014.

2.1.19 Given the increased propensity in agile and home working, which began during the Covid-19 pandemic, employment land demand/ requirements may change. Notwithstanding this, the

[11] ONS Annual Population Survey (12 months to December 2023)
[12] Statswales.gov.uk. Note this data is based on a small sample survey and should therefore be treated with caution.
[13] Smarter working: a remote working strategy for Wales [HTML] | GOV.WALES
[14] The Employment Land Background Paper – December 2023

RLDP provides a range of B Use Class employment sites to meet needs to 2033 and to support the Council's economic ambitions set out in the Economy, Employment and Skills Strategy.

2.2 Influences on the Replacement Local Development Plan

Legislative Context

2.2.1 The RLDP has been prepared in the context of relevant national legislation and plans, policies and strategies at the national, regional and local level, details of which are set out in Appendix 4.

Regional Collaboration and Linkages with Neighbouring Local Authorities

2.2.2 When preparing an LDP, local planning authorities are required to demonstrate that the plan is 'sound' by meeting the tests of soundness set out in the Development Plans Manual. In accordance with soundness test 1 'Does the plan fit?' the Council must demonstrate that the RLDP is consistent with other plans i.e. is it compatible with the plans of neighbouring LPAs? And has the LPA demonstrated it has exhausted all opportunities for joint working and collaboration on both plan preparation and the evidence base?

2.2.3 It is therefore imperative that the Council has regard to its neighbouring authorities and the wider South East Wales region and English border authorities in preparing the RLDP. This is important as what is happening in adjoining areas can have implications for Monmouthshire in many ways. Parts of Monmouthshire may act as employment and service centres for people living in neighbouring authorities and vice versa. This requires an understanding of existing and emerging potential linkages, strategies and policies in adjoining areas, as well as active engagement in their development. Suitable consultation processes are in place to ensure that the existing and evolving planning policy context of neighbouring authorities has been considered in the preparation of the RLDP.

2.2.4 Monmouthshire adjoins 8 other local planning authority areas, all of which are at varying stages of their development plan production and are required to routinely consult the Council as part of their development plan preparation. These are:

- Torfaen County Borough Council
- Newport City Council
- Blaenau Gwent County Borough Council
- Bannau Brycheiniog National Park Authority
- Powys County Council
- Herefordshire Council
- Forest of Dean District Council
- South Gloucestershire Council

2.2.5 At the regional level, collaboration between the 10 LPAs in South East Wales takes place via various regional groups including South East Wales Strategic Planning Group (SEWSPG), South East Wales Planning Officer Society (SEWPOS) and South Wales Regional Aggregates Working Party (SWRARWP). Through SEWSPG the LPAs work collaboratively on the preparation of a joint evidence base to inform RLDPs and the emerging SDP. Further detail on such regional

collaboration, and the status of, and linkages with the development plans of neighbouring local authorities is set out in Appendix 5.

Key Issues, Challenges and Opportunities

3. Key Issues and Challenges

3.1.1 The key issues, challenges and opportunities identified through the RLDP preparation process have informed the development of the Plan's Vision, Objectives and the Plan as a whole. The key issues facing the County (economic, environmental, social and cultural) are set out in the RLDP Issues, Vision and Objectives Paper[15] and Appendix 6. A summary of the key issues, challenges and opportunities that the RLDP will address is provided below:

- We have the highest average house prices in Wales. This means a large proportion of people cannot afford to buy a home so either leave the County, or have to live with their parents or in shared housing for longer. We have 2,064 households identified as being in need of affordable housing[16]. The RLDP explores opportunities to increase the number of affordable homes and ensure a range and choice of homes, both market and affordable, are incorporated within new developments.
- Our population is getting older. By 2033 we will have more people over the age 65+ living in the County but fewer young people. The 2021 Census identifies that nearly 26% of the population in Monmouthshire is over 65 (compared to 21% in Wales), with 16% under the age of 16 (18% in Wales) and just over 58% of working age (16-64) (61% in Wales). An older population changes the kind of services our communities will need, but also reduces the number of people using and financially supporting businesses and services. We will have a smaller economically active population making Monmouthshire a less attractive place for businesses to locate. This impacts on our future economic prospects. By increasing the supply of affordable housing we can retain a larger number of younger people in the County, increasing the sustainability of our economy and public services.
- The Council has declared a climate and nature emergency and has set out a commitment to strive to reduce its own carbon emissions to net zero in line with the Welsh Government target of 2030, together with a strengthened emphasis on nature recovery. The RDLP provides the land use policy framework to address the climate and nature emergency together, seeking outcomes that recognise the role resilient ecosystems can play in tackling carbon emissions and mitigating the impact of climate change. The RLDP establishes policy to support and enable renewable energy generation and sets out the requirements for net zero carbon developments and other sustainable development principles such as active travel, green infrastructure and local food production. These sit alongside and integrate with policies for protection of sites designated for biodiversity, habitats and species and deliver on Net Biodiversity Benefit. The requirement that all future housing is net zero carbon is intended to reduce overall carbon emissions. The requirement that new strategic sites for housing are within walking distance of existing town centres is also intended to reduce carbon emissions.

[15] The Issues, Vision and Objectives Paper September 2024

[16] MCC Local Housing Market Assessment (LHMA) Refresh 2022-2037. MCC Cabinet approved the LHMA Refresh 2022-2037 in May 2024 prior to submission to Welsh Government. The housing team are currently awaiting sign off from Welsh Government

- We have an urgent need to tackle water quality and phosphate pollution in our rivers. Natural Resources Wales (NRW) has adopted tighter targets for river water quality and have put in place a requirement to achieve phosphate neutrality or betterment in the River Usk and River Wye. In recognition of the water quality issues in the County, the Climate and Nature Emergency Strategy and associated action plans outline steps the Council will take to protect our rivers and ocean.
- There is a need to consider whether existing employment land is suitably located and fit for purpose, along with the potential increase in agile and home working and the impact this may have on employment land demand/requirements. We also need to consider future demand in line with Council aspirations and the opportunities that a shift in working behaviour could create with businesses given greater flexibility over where to locate.
- Monmouthshire benefits from its involvement in regional partnerships including the Cardiff Capital Region City Deal, Marches Forward Partnership and The Western Gateway. Opportunities associated with such partnership working include economic investment/innovation and transport and digital connectivity. Further details are provided in Appendix 3.
- Unemployment levels are low; however, Monmouthshire has a dual economy. The qualifications, skills and earnings of the residents are above the regional and national average, however, for those working in the area earnings are lower and employment is relatively less skilled. Monmouthshire has a net-outflow of commuters. Those who commute out of the County are higher earners than those who commute into the County. To address these issues there is a need to provide support for inward investment and local employment growth/opportunities as identified in the Economy, Employment and Skills Strategy.
- Vacancy rates in some of the County's town and local centres have increased[17] due to changing shopping habits including internet shopping and economic factors such as inflation diminishing the disposable income of many households.
- There are challenges of rural isolation and sustaining rural communities, including regenerating the rural economy. The pandemic emphasised the value and importance of having locally accessible services and facilities.
- We want to protect the landscapes and heritage that make Monmouthshire a unique and attractive place to live. The RLDP recognises the value and importance of placemaking and the provision of locally accessible open/spaces for health and well-being and recreation.
- Tourism plays a significant part in the Monmouthshire economy particularly in assisting in the diversification of the rural economy and in sustaining the County's historic town centres. According to figures supplied by tourism economic indicator STEAM (Scarborough Tourism Economic Activity Monitor), the sector brought in £285m to Monmouthshire in 2022 and supported the equivalent of 3,356 full-time jobs (STEAM report 2022).

[17] Evidence is contained in the Retail section of the 2022-2023 Annual Monitoring Report

Development Constraints

3.1.2 The RLDP response to these issues must be considered and delivered with regard to development constraints that need to be avoided, mitigated and balanced to achieve sustainable development principles such as placemaking, active travel and environmental considerations including high quality landscapes across the County, biodiversity designations and green infrastructure. Collectively these constraints and policy requirements will need to be balanced and will influence the location and scale of development appropriate to different parts of the County. Specific examples are discussed throughout the policy framework contained in this Deposit Plan, with some key constraints discussed below.

Water Quality in Riverine Special Areas of Conservation (SAC)

3.1.3 Following recent evidence about the environmental impacts of phosphates in watercourses, Natural Resources Wales (NRW) has adopted tighter targets for river water quality and has assessed the nine riverine Special Areas of Conservation in Wales. Within Monmouthshire, it was identified that 88% and 67% of the River Usk's and River Wye's water bodies respectively failed to meet the required target[18].

3.1.4 In response, NRW issued detailed planning guidance to ensure that the environmental capacity of the rivers does not deteriorate any further. This outlines what type of development is unlikely to have an impact on phosphate levels in the watercourses. Development proposals within the affected catchment areas of the rivers Usk and Wye that might increase phosphate levels must achieve phosphate neutrality or betterment. This guidance can be found on the Council's website.

3.1.5 This guidance has significant implications for development proposals within the river catchment areas. We have been working collaboratively with NRW, Dŵr Cymru Welsh Water (DCWW), Welsh Government, the development industry and our biodiversity officers to find solutions to enable growth and allocate sites through the RLDP process that do not harm the environmental capacity of our watercourses. DCWW have confirmed that a workable and achievable solution to phosphates has been identified for both the Monmouth Wastewater Treatment Works (WwTW) (benefitting the River Wye Catchment) and Llanfoist Wastewater Treatment Works (WwTW) serving Abergavenny (benefitting the upper River Usk catchment). There is a firm commitment by DCWW to implement these improvements. This investment will significantly reduce the amount of phosphates entering the water environment from the treatment works, providing environmental improvement and capacity for new development (housing, commercial, retail, agricultural) to proceed, supporting the long-term sustainability of towns and communities while safeguarding water quality. In addition, NRW's Environmental Permit review has confirmed the potential to use existing capacity within a number of existing wastewater treatment plants which will enable sustainable growth in various settlements in the affected catchment areas over the Plan period.

Site Search Sequence and Best and Most Versatile Agricultural Land

3.1.6 The approach to site selection for the Deposit Plan has followed the site search sequence outlined in PPW12, which prioritises the use of suitable and sustainable previously developed

[18] A plan of the catchment area of the Rivers Usk and Wye can be found on the Council's website

land before considering greenfield sites. This process has, however, acknowledged the limited brownfield resource available in Monmouthshire and the environmental, social and economic considerations that need to be balanced in a Monmouthshire context.

3.1.7 A key consideration in assessing the Candidate Sites has been the high percentage of Best and Most Versatile (BMV) agricultural land within Monmouthshire. The widespread distribution of BMV agricultural land throughout Monmouthshire means that it does not affect the spatial strategy: all four of our primary settlements are surrounded by BMV agricultural land, so it is not possible to avoid the development of such land via a different spatial strategy.

Green Belt

3.1.8 Policy 34 of Future Wales requires the future South East Wales Strategic Development Plan (SDP) to identify a green belt to the north of Cardiff, Newport and the eastern part of the region to manage urban form and growth. The South East Wales Regional Strategic Diagram (page 163 of Future Wales) provides an indicative plan of the area for consideration with the detailed boundary to be defined through the preparation of the SDP.

3.1.9 While the County's main towns are situated outside of Future Wales' indicative green belt, in assessing candidate sites and their relationship to Policy 34 of Future Wales, consideration has been given to PPW12 which states that when considering a Green Belt designation, a sufficient range of development land which is suitably located in relation to the existing urban edge should be made available, having regard to the longer term need for development land, the effects of development pressures in areas beyond the Green Belt and the need to minimise demand for travel. This may require land to be safeguarded, and boundaries of proposed Green Belts must be carefully defined to achieve this. Potential Green belt land is to be assessed and designated as part of a Strategic Development Plan (SDP) for the South East Wales Region.

3.2 Key Opportunities

3.2.1 Having identified the key issues and challenges facing the County that the RLDP needs to address, the following sets out some of the key opportunities to realising some of the issues and challenges.

Future Wales: The National Plan 2040 (February 2021)

3.2.2 Welsh Government published Future Wales 2040 in February 2021. While this sets out the national development framework and direction for development in Wales to 2040, it contains a number of policies that are of particular relevance to Monmouthshire providing the national policy context to address our evidenced key issues. Policy 3 – Supporting Urban Growth and Regeneration- Public Sector Leadership- sets out that Welsh Government will play an active role in the delivery of growth and urban regeneration, working with local authorities to unlock the potential of public land and support local authorities to take an increased development role. Policy 4 – Supporting Rural Communities and Policy 5 – Supporting the Rural Economy, provide the policy framework to consider how age balanced communities can be achieved, where depopulation should be reversed and allow for sustainable, appropriate and proportionate economic growth. Policy 7 – Delivering Affordable Homes, also addresses the key issue of affordable housing prices in the County and provides the framework to address

this through affordable housing-led developments. These policies provide significant opportunities to address a number of the key issues facing the County.

Climate and Nature Emergency

3.2.3 As noted above, the Council has declared a climate and nature emergency. The associated Climate and Nature Emergency Strategy and Action Plan identifies the key actions the Council will take to reduce its own carbon emissions to net zero, and also makes a commitment to work with partners and organisations to develop and implement best practice in limiting global warming to less than 1.5°C. As recognised by PPW12, the RLDP's policy framework and allocations provide a significant opportunity to address the causes and effects of climate change. It is recognised that efforts to tackle climate change are wide-ranging and will require a co-ordinated approach to development including aspects such as active travel, green infrastructure, effective use of land and resources and flood resilience.

3.2.4 In recognition of the urgent need to address water quality in the County, the Motion for the Rivers and Ocean associated Action Plan, set out measures to tackle river water quality, utilising existing partnerships to provide a co-ordinated approach. Of particular relevance to the RLDP is the ongoing work with NRW and Dŵr Cymru Welsh Water and continued involvement with the Wye Nutrient Management Board and the Usk Catchment Partnership to identify and implement options for delivering improvements in water quality.

Regional Strategic Partnerships

3.2.5 As a border county in a strategic 'Gateway to Wales' location, Monmouthshire benefits from its involvement in regional partnerships including the Cardiff Capital Region City Deal, The Western Gateway and Marches Forward. Participation in these partnerships offer a number of opportunities for Monmouthshire, including exploiting areas of mutual benefit and added value, increasing investment prospects and showcasing best practice by building strong networks. The RLDP will provide the policy framework to support relevant opportunities arising from such partnership working, including in relation to economic innovation, transport and digital connectivity, rural development and the transition to net zero. Further details on these strategic partnerships are provided in Appendix 3.

Regional Assessment of Future Growth and Migration for the Cardiff Capital Region (CCR)

3.2.6 A Regional Assessment of Future Growth and Migration for the Cardiff Capital Region (CCR) has been prepared on behalf of local authorities in the South East Wales region. It considers how each local authority could contribute towards increasing the number of jobs across the region by 2040 and how the increase in jobs corresponds with projected growth in local authorities, the region and Future Wales 2040. It reviews the migration assumptions underpinning the proposed level of population/jobs growth and the potential implications of the spatial distribution of jobs and people on travel patterns. Prepared within context of Future Wales, the study provides a policy-off approach to the assessment of potential growth in the region. As such, it sits alongside and complements RLDP evidence prepared by each authority in the region. It is not intended to replace or supersede the detailed consideration of growth potential prepared by individual authorities to inform the RLDP process.

Monmouthshire Economy, Employment and Skills Strategy

3.2.7 The Council's ambitions for sustainable economic growth/prosperity are set out in the Economy, Employment and Skills Strategy which strives 'to foster a diverse, fairer, greener, and circular economy, generating sustainable employment growth and creating conditions for shared prosperity', and focuses on four key priority themes:

- A vibrant, greener Monmouthshire, including a focus on supporting the vitality of the County's town centres, supporting rural diversification and the transition to net zero and improving the visitor experience to deliver sustainable growth in the hospitality sector.
- A fairer, more successful Monmouthshire, by encouraging more job opportunities as highlighted above and actions to improve skills and employment progression.
- A thriving, ambitious Monmouthshire, including support for increasing entrepreneurship, enabling businesses to expand and taking advantage of those sectors in which Monmouthshire and CCR have relative strengths.
- A well-connected Monmouthshire, attracting business investment, through improved digital and transport connectivity and the availability of employment land and premises.

3.2.8 The strategy seeks to tackle inequality, specifically by seeking to address sustainable employment growth through attracting and retaining investment, creating jobs, and improving strategic infrastructure through the identification of sufficient employment land for employment uses. It aligns with the Replacement Local Development Plan (RLDP) and recognises that the RLDP is a key mechanism for achieving many of the key objectives, including a supportive policy framework to facilitate economic growth in a range of sectors and identifying sufficient land to enable the growth of the B Use Class Sector.

RLDP Strategic Framework

4. RLDP Vision (2018-2033)

4.1.1 This section of the Plan sets out the Vision, Objectives and Strategy for the County which underpin the RLDP. The Vision outlines how the County is planned to develop, change or be conserved up to 2033, and provides the framework for the Plan's strategy and policies. The Vision set out in the adopted LDP 2011-2021 has been reviewed and updated to take account of the issues, challenges and opportunities facing the County, key elements of the Gwent PSB[19] Well-being Plan (August 2023) and MCC's Taking Monmouthshire Forward – Community and Corporate Plan 2022-2028 (April 2023)[20].

RLDP Vision

By 2033 Monmouthshire will be home to well-connected, exemplar affordable housing-led, net zero carbon places that provide employment and support demographically balanced sustainable and resilient communities for all, where:

- People are living in inclusive, equal, safe, cohesive, prosperous and vibrant communities. Both urban and rural areas are well-connected with better access to local services and facilities, open space and employment opportunities.
- Communities and businesses are part of an economically thriving, ambitious and well-connected County.
- The best of the County's built heritage, countryside, biodiversity, landscape and environmental assets have been protected and enhanced to retain its distinctive character.
- People enjoy healthier, more sustainable lifestyles with improved access to public transport and active travel opportunities and have a minimised impact on the global environment, supporting our ambitions for a zero carbon county.

5. RLDP Objectives (2018-2033): Delivering the Vision

5.1.1 In order to address the key issues and challenges and deliver the Vision, 17 Objectives have been developed for the RLDP. These build upon the Adopted LDP objectives, taking account of a range of policy drivers that have emerged in recent years, including the Well Being of Future Generations Act 2015, the Gwent PSB Well-being Plan and the Council's Community and Corporate Plan. The Gwent PSB steps replace the objectives previously set out in the Monmouthshire PSB Well-being Plan. The RLDP Objectives have been kept under review and updated as necessary as part of the continued development of the RLDP evidence base.

[19] The Gwent PSB has been formed by the former five PSBs of Blaenau Gwent, Caerphilly, Newport, Monmouthshire and Torfaen, along with the Aneurin Bevan University Health Board, South Wales Fire and Rescue Service and Natural Resources Wales.

[20] The Community and Corporate Plan 2022-2028 sets out the Council's core purpose, principles, and priorities. It was adopted by Council on 20th April 2023.

5.1.2 The Plan's objectives are sufficiently aspirational yet also achievable within a spatial planning context. They respond to and deliver upon the Plan's key issues of delivering essential affordable homes at pace and scale, responding to the climate and nature emergency by delivering net zero carbon new homes in exemplar places, and ensuring our communities are socially and economically sustainable by attracting and retaining younger people to rebalance our ageing demographic. Importantly, the objectives provide the basis for a sound plan in terms of their fit, appropriateness and deliverability[21].

5.1.3 As with the RLDP issues, the objectives have been grouped in alignment with the seven well-being goals as set out in the Well-being of Future Generations (Wales) Act 2015, and are aligned with the RLDP issues, the main policy themes identified in Planning Policy Wales (PPW12), the Gwent PSB Well-being Plan steps and the Council's Community and Corporate Plan, as set out in Table 1. The objectives are not listed in priority order.

[21] Development Plans Manual, Edition 3, 2020 (Welsh Government)

Table 1: RLDP Objectives

RLDP Objective Number	Headline	RLDP Objective	RLDP Issues addressed	Main PPW12 theme	Gwent PSB Well-being Plan Steps	Community & Corporate Plan Objectives
A Prosperous Wales (Well-being Goal 1)						
Objective 1	Economic Growth/ Employment	To support a thriving, well-connected, diverse economy, which provides a range of good quality employment opportunities to enable and encourage indigenous business growth and attract inward investment and competitive innovative businesses, including through the provision of start-ups and grow on spaces.	1, 2, 3, 4, 5, 6, 7, 24	Productive and enterprising places	Take action to reduce the cost-of-living crisis in the longer term.	A Thriving and Ambitious Place.
Objective 2	Town and Local Centres	To sustain and enhance the centres of Abergavenny, Caldicot, Chepstow, Magor Monmouth and Usk as vibrant and attractive centres serving the needs of their population and those of their surrounding hinterlands, and supporting adaptation to meet the needs of the evolving role of the high street.	8	Active and social places	Take action to address inequities, particularly in relation to health, through the framework of the Marmot Principles. Enable and support people, neighbourhoods, and communities to be resilient, connected, thriving and safe.	A Thriving and Ambitious Place.
A Resilient Wales (Well-being Goal 2)						
Objective 3	Green Infrastructure,	To protect, enhance and manage the resilience of Monmouthshire's natural	11, 12, 35	Distinctive and natural places	Take action to reduce our carbon emissions, help	A Green Place to Live.

RLDP Objective Number	Headline	RLDP Objective	RLDP Issues addressed	Main PPW12 theme	Gwent PSB Well-being Plan Steps	Community & Corporate Plan Objectives
	Biodiversity and Landscape	environment, biodiversity and ecosystems and the connectivity between them, while at the same time maximising benefits for the economy, tourism, health and well-being. This includes the Wye Valley National Landscape (AONB), the County's other high quality and distinctive landscapes, protected sites, protected species and other biodiversity interests.			Gwent adapt to climate change, and protect and restore our natural environment.	
Objective 4	Flood risk	To ensure that new development takes account of the risk of flooding, both existing and in the future, including the need to avoid inappropriate development in areas that are at risk from flooding or that may increase the risk of flooding elsewhere and the need to design development, including the use of natural flood management measures to appropriately manage flood risk and surface water run-off.	12, 13	Distinctive and natural places	Take action to reduce our carbon emissions, help Gwent adapt to climate change, and protect and restore our natural environment.	A Green Place to Live.
Objective 5	Minerals and Waste	To meet the County's regional and local obligations to manage and dispose of its waste and to safeguard and exploit its mineral resource in a sustainable fashion.	14, 15	Productive and enterprising places	Take action to reduce our carbon emissions, help Gwent adapt to climate change, and protect and restore our natural environment.	A Green Place to Live.

RLDP Objective Number	Headline	RLDP Objective	RLDP Issues addressed	Main PPW12 theme	Gwent PSB Well-being Plan Steps	Community & Corporate Plan Objectives
Objective 6	Land	To promote the efficient use of land, including the need to: • maximise opportunities for development on previously developed land, whilst recognising that brownfield opportunities are limited in Monmouthshire. • protect the best and most versatile (BMV) agricultural land whilst at the same time recognising that this will not always be possible given high proportion of BMV land in the County and the limited opportunities for brownfield development. • support the adaptation and re-use of existing sustainably located buildings.	16, 17	Strategic and spatial choices	Take action to reduce our carbon emissions, help Gwent adapt to climate change, and protect and restore our natural environment.	A Green Place to Live.
Objective 7	Natural resources	To ensure the efficient use of natural resources including providing increased opportunities for water efficiency, energy efficiency, renewable energy, recycling and waste reduction.	14, 15, 31, 37	Productive and enterprising places	Take action to reduce our carbon emissions, help Gwent adapt to climate change, and protect and restore our natural environment.	A Green Place to Live. A Safe Place to Live.
A Healthier Wales (Well-being Goal 3)						
Objective 8	Health and Well-being	To improve access for all to recreation, sport, leisure activities, open space and the	18, 20, 21, 33, 35	Active and social places	Take action to address inequities, particularly in	A Fair Place to Live.

RLDP Objective Number	Headline	RLDP Objective	RLDP Issues addressed	Main PPW12 theme	Gwent PSB Well-being Plan Steps	Community & Corporate Plan Objectives
		countryside and to enable healthier lifestyles. To support the Health Board to improve health infrastructure to meet community needs.			relation to health, through the framework of the Marmot Principles.	A Safe Place to Live. A Connected Place Where People Care.
A More Equal Wales (Well-being Goal 4)						
Objective 9	Demography	To increase opportunities for the younger population to both live and work within Monmouthshire, creating a more balanced demography and socially and economically sustainable communities.	2, 3, 4, 5, 24	Active and social places	Enable and support people, neighbourhoods, and communities to be resilient, connected, thriving and safe.	A Fair Place to Live. A Thriving and Ambitious Place. A Safe Place to Live.
A Wales of Cohesive Communities (Well-being Goal 5)						
Objective 10	Housing	To provide urgently needed affordable housing within exemplar, mixed, sustainable and well-connected places both for existing and future residents.	23, 25, 26, 27, 28	Active and social places	Provide and enable the supply of good quality, affordable, appropriate homes.	A Fair Place to Live. A Safe Place to Live.

RLDP Objective Number	Headline	RLDP Objective	RLDP Issues addressed	Main PPW12 theme	Gwent PSB Well-being Plan Steps	Community & Corporate Plan Objectives
Objective 11	Placemaking	To create exemplar sustainable places through design, layout and mix of uses that enhance the character and identity of Monmouthshire's settlements and landscape; create attractive, safe and accessible places to live, work and visit; and promote people's prosperity, health, happiness and well-being.	1, 11, 12, 18, 20, 27, 28, 29, 30, 31, 32, 34, 35	Strategic and spatial choices	Enable and support people, neighbourhoods, and communities to be resilient, connected, thriving and safe.	A Green Place to Live. A Thriving and Ambitious Place. A Safe Place to Live.
Objective 12	Communities	To ensure Monmouthshire is a connected place where people feel part of a community, are valued and have good access to education, employment, shops, housing, public transport, active travel, healthcare, community and cultural facilities.	1, 5, 7, 8, 9, 18, 20, 25, 26, 27, 29, 30, 31, 33, 35	Strategic and spatial choices	Enable and support people, neighbourhoods, and communities to be resilient, connected, thriving and safe.	A Fair Place to Live. A Green Place. A Thriving and Ambitious Place. A Safe Place to Live. A Connected Place Where People Care.

RLDP Objective Number	Headline	RLDP Objective	RLDP Issues addressed	Main PPW12 theme	Gwent PSB Well-being Plan Steps	Community & Corporate Plan Objectives
						A Learning Place.
Objective 13	Rural Communities	To sustain existing rural communities as far as possible by providing affordable homes and development opportunities of an appropriate scale and location in rural areas in order to assist in building sustainable rural communities and strengthening the rural economy.	6, 7, 20, 22, 26, 29, 30, 34	Productive and enterprising places	Provide and enable the supply of good quality, affordable, appropriate homes.	A Fair Place to Live. A Safe Place.
Objective 14	Infrastructure	To ensure that appropriate physical and digital infrastructure (including community and recreational facilities, education, sewerage, water, transport, health care and broadband etc.) is in place or can be provided to accommodate new development.	12, 19, 20, 31	Productive and enterprising places	Enable and support people, neighbourhoods, and communities to be resilient, connected, thriving and safe.	A Green Place to Live. A Thriving and Ambitious Place. A Connected Place Where People Care. A Learning Place.
Objective 15	Accessibility	To seek to reduce the need to travel by promoting a mix of land use allocations and improved internet connectivity, and where	10, 30, 36	Active and social places	Enable and support people, neighbourhoods, and communities to be	A Green Place to Live.

RLDP Objective Number	Headline	RLDP Objective	RLDP Issues addressed	Main PPW12 theme	Gwent PSB Well-being Plan Steps	Community & Corporate Plan Objectives
		travel is required, to provide opportunities for active travel and integrated sustainable transport above use of the private car.			resilient, connected, thriving and safe.	A Thriving and Ambitious Place.
A Wales of Vibrant Culture & Thriving Welsh Language (Well-being Goal 6)						
Objective 16	Culture, Heritage and Welsh Language	To protect and enhance the built environment, culture and heritage of Monmouthshire for the future while maximising benefits for the economy, tourism and social well-being, including supporting and safeguarding the Welsh Language.	9, 32, 33, 34, 35	Distinctive and natural places	Enable and support people, neighbourhoods, and communities to be resilient, connected, thriving and safe.	A Fair Place. A Thriving and Ambitious Place. A Connected Place Where People Care. A Learning Place.
A Globally Responsible Wales (Well-being Goal 7)						
Objective 17	Climate and Nature Emergency	To strive to limit the increase in global temperatures to 1.5°C, supporting carbon reduction through a variety of adaptation measures including facilitating resilient ecosystems and nature recovery, the use of renewable energy, net zero homes, the design and location of new development,	10, 12, 36, 37, 38	Distinctive and natural places	Take action to reduce our carbon emissions, help Gwent adapt to climate change, and protect and restore our natural environment.	A Green Place to Live. A Thriving and Ambitious Place.

RLDP Objective Number	Headline	RLDP Objective	RLDP Issues addressed	Main PPW12 theme	Gwent PSB Well-being Plan Steps	Community & Corporate Plan Objectives
		encouraging balanced job and population growth to reduce out-commuting, the provision of broadband connectivity to reduce the need to travel, the provision of ultra-low emission vehicle charging infrastructure to reduce emissions and improve air quality, and the provision of quality green infrastructure.				A Safe Place to Live.

6. RLDP Sustainable and Resilient Communities Strategy

6.1.1 The Deposit Plan sets out the growth and spatial strategy to facilitate sustainable growth in the County up to 2033, embodying the principles set out in the Community and Corporate Plan of tackling inequality, protecting our environment and adapting to a world being reshaped by climate change. The Strategy has been informed by a wide range of robust evidence[22] and responds to a number of key challenges that have arisen during the plan preparation process[23]. Within this context, the RLDP seeks to deliver on the Vision and Objectives and meet our core purpose of delivering sustainable and resilient communities. Further details on the strategy options considered are set out in the Growth and Spatial Options Paper. All reasonable strategy alternatives have been assessed through the ISA process.

6.1.2 The RLDP Growth and Spatial Strategy seeks to deliver sustainable and resilient communities by addressing our core issues of:

- Housing Affordability - delivering essential affordable homes at pace and scale to meet local needs.
- Rebalancing our Demography- ensuring our communities are socially and economically sustainable by attracting and retaining younger people to rebalance our ageing demographic.
- Climate and Nature Emergency- responding the climate and nature emergency, including through the delivery of net zero carbon new homes for our communities and ensuring development proposals provide a net benefit for biodiversity and improved ecosystem resilience.
- Economic Prosperity – supporting and enabling sustainable economic growth.

6.1.3 The Sustainable and Resilient Communities Growth and Spatial Strategy:

- Makes provision for approximately 5,400 - 6,210 homes over the Plan period 2018-2033[24]. This includes the provision of approximately 1,595- 2,000 affordable homes. As there are currently approximately 4,080 homes in the housing landbank[25], land will be allocated for approximately 1,320 – 2,130 new homes, including 660 – 1,065 new affordable homes. These homes will be delivered through various housing land supply components, details of which are set out in Table 2 below, Appendix 7 and the Housing Background Paper.
- Allocates a minimum of 38ha of B use class employment land and sets out the planning policy framework to support job growth of up to 6,240 additional jobs over the Plan period.

[22] This includes key Issues, Vision and Objectives, Community and Corporate Strategy, evidence base studies, community and stakeholder consultation/engagement, the Integrated Sustainability Appraisal (ISA), the Sustainable Settlement Appraisal, National Planning Policy and the LDP tests of soundness.
[23] These include Welsh Government objection to the level of growth set out in the 2021 Preferred Strategy and water quality issues in the Rivers Wye and Usk.
[24] In accordance with the Development Plans Manual (WG, March 2020) an allowance is made for a 15% flexibility allowance to factor in sites that may not come forward, unforeseen issues or to meet higher aspirations for the County to enable the provision/delivery of additional sites if all sites are delivered.
[25] As the Plan period has already begun (2018) some of the homes in the landbank have been built, are under construction or have planning permission. The landbank figure also takes into account LDP 'rollover' allocations, windfall sites and small sites.

The Plan also includes policies to facilitate growth in foundational sectors such as retail, leisure, tourism and agriculture. The RLDP is supported by the Council's Economy, Employment and Skills Strategy and Local Transport Strategy. Collectively these key plans/strategies will support sustainable economic growth/job creation through a range of mechanisms and interventions.

- Focuses growth in the County's most sustainable settlements of Abergavenny, Chepstow, Monmouth and Caldicot, including Severnside, as well as some growth in our most sustainable rural settlements to deliver much needed affordable homes and to address rural inequality and rural isolation in these areas. Strategic sites are identified to sustainably expand the Primary Settlements of Abergavenny, Caldicot, Chepstow and Monmouth. Additional site allocations are identified in sustainably located edge of settlement locations in various settlements across the County. These site allocations are set out in policies HA1 to HA18.
- Limits the impact of climate change by ensuring new homes are net zero carbon and well connected with existing settlements, providing attractive and accessible places to live and work.

6.2 RLDP Sustainable and Resilient Communities Growth Strategy

6.2.1 Strategic Policy S1 sets out the RLDP Growth Strategy.

Strategic Policy S1 – Growth Strategy

In order to meet Monmouthshire's core purpose of building sustainable and resilient communities for all, between 2018 and 2033 the Plan will make provision for:

- 6,210* homes to meet a housing requirement of 5,400 homes.
- A minimum of 38ha of employment land (Use Classes B1, B2, B8).

The focus of this growth will be on the County's most sustainable settlements, as outlined in the sustainable settlement hierarchy set out in Policy S2.

*This figure includes an indicative 15% flexibility allowance.

6.2.2 The RLDP Growth Strategy adopts a 'policy-on' approach based on a demographic-led scenario with added policy assumptions[26]. It proposes a sustainable level of growth, in terms of homes and jobs, that addresses our local evidence-based issues and objectives, including in relation to the delivery of affordable homes, sustainable economic growth, and rebalancing our demography ensuring that young people can choose to live in the County, while responding to the climate and nature emergency. This Growth Strategy is deemed the most appropriate, sustainable means to deliver the RLDP Vision and Objectives as justified within the RLDP Growth and Spatial Options Paper.

[26] Demographic-led option for the LPA area (i.e. excludes the BBNP area within Monmouthshire) using ONS 2020 MYE base and applying assumptions in relation to migration, household membership rates and commuting ratio. Further details are set out in the Growth and Spatial Options Paper.

6.2.3 This level of growth is in general conformity with Future Wales's overall strategy. Although Monmouthshire is not within the National Growth Area identified in Future Wales 2040, our evidence shows that the identified level of growth is essential to deliver our local evidence-based issues and objectives and ensure the RLDP is sound. It is supported by Future Wales policies 3, 4, 5 and 7, which support public leadership and the use of public land to deliver on ambitious affordable housing targets, demographically balanced rural communities, the rural economy and the delivery of affordable homes. The RLDP Growth Strategy will assist in addressing our core issues without harming or compromising Welsh Government's objectives for the wider South East Wales region.

6.2.4 The Growth Strategy also meets the key 'Tests of Soundness' of ensuring that the Plan is locally specific, addresses key issues, is supported by robust, proportionate and credible evidence, and ensuring that the Plan's Vision and Strategy are positive and sufficiently aspirational. A Self-Assessment of the Deposit Plan against the Tests of Soundness includes an assessment of the Plan's general conformity with Future Wales 2040. This demonstrates that the Deposit Plan and the stages undertaken and processes followed to reach this stage are 'sound', and that the RLDP assists in the delivery of key Future Wales policies and is in general conformity with its overarching strategy.

6.3 RLDP Sustainable and Resilient Communities Growth Strategy: Addressing our Key Issues and Objectives

Delivery of Affordable Housing

6.3.1 The RLDP will deliver approximately 5,400 – 6,210 homes over the Plan period 2018-2033. This includes the provision of approximately 1,595 – 2,000 affordable homes, of which approximately 660 – 1,065 will be delivered through new housing allocations.

6.3.2 The Plan is focused on the delivery of affordable homes to specifically address housing affordability which is one of the most fundamental challenges facing our communities. High average house prices and high house prices in relation to earnings in the County have resulted in a pressing need for affordable housing, with a significant proportion of people unable to afford to buy or rent a home, meaning they have to either leave the County, or live with their parents or in shared housing for longer. The Covid-19 pandemic further increased the need for affordable homes and revealed the extent of hidden homelessness in the County.

6.3.3 The RLDP seeks to maximise affordable housing delivery on new housing allocations, reflecting the Council's commitment to deliver 50% affordable homes on new housing sites to help tackle Monmouthshire's housing need, homelessness and social inequality. The RLDP enables the Council to consider alternative mechanisms for delivering affordable homes and all opportunities to increase the supply of affordable housing will be considered.

6.3.4 To deliver on our key objectives, the residential site allocations identified in the Deposit Plan have demonstrated that they are viable and deliverable based on the Council's requirement to deliver 50% affordable homes on these sites, along with the requirement for net zero carbon homes and associated infrastructure to ensure the developments are sustainable and well-connected. This ambitious policy may require Welsh Government policy position changes on use of Social Housing Grant or other public sector funding. Submitted viability assessments demonstrate at the time of publication that these sites are deliverable. However, it is

recognised this could change in the future and additional public subsidy may be required. The Deposit Plan is accompanied by an Infrastructure Delivery Plan (Appendix 8) and updated Local Transport Strategy to demonstrate the delivery of essential infrastructure.

6.3.5 The homes that we deliver will need to match people's ability to pay. Development proposals will be informed by the latest Local Housing Market Assessment[27] to ensure the delivery of appropriate house types and tenure. Policy H8 Housing Mix also requires proposals for market homes to provide smaller house types to assist in addressing housing affordability. The Council is working with the Welsh Government, Registered Social Landlords and house developers to ensure the delivery of affordable homes meets our local needs. The Strategy also recognises the aspiration of Future Wales Policy 3 for public sector leadership to unlock the potential of public land and to take an increased development role.

Rebalancing our Demography

6.3.6 Monmouthshire's population is getting older which impacts on the economic and social sustainability of our communities. We must therefore seek to ensure that younger people can choose to live in the County to create more age-balanced sustainable and resilient communities, as well as increasing the economically active population.

6.3.7 The RLDP proposes a level of growth that begins to address the unbalanced and ageing demographic with an increase in younger and working age groups[28] and provides opportunities for younger people to both live and work in the County. Policy support for economic growth/job creation and the provision of 50% affordable housing, as well as policy intervention to ensure market sector housing provides a suitable range and mix of house sizes, will assist in attracting and retaining a younger, economically active population and creating a more balanced demography and socially and economically sustainable communities.

6.3.8 Requiring the provision of a wider choice of smaller market and affordable homes will provide opportunities for both younger people to both stay in and move to the area, and older people to downsize from large family homes. Enabling younger people to live and work in Monmouthshire will assist in making our ageing communities more socially and economically sustainable.

Responding to the Climate and Nature Emergency

6.3.9 The Plan's proposed level of growth secures the economic, social and cultural sustainability of Monmouthshire's communities without comprising the environmental sustainability. All new homes will be required to be net zero carbon in accordance with Policy NZ1 reflecting the Council's commitment to responding to and tackling climate change, and will be well connected with existing settlements, adding to their sustainability. In accordance with national planning policy, we will seek to maintain and enhance biodiversity by ensuring development does not cause any significant loss of habitats or populations of species and provides a net benefit for biodiversity and improved ecosystem resilience. Placemaking principles will underpin all new developments ensuring we deliver attractive and accessible places to live and work.

[27] LHMA Refresh 2022-2037. MCC Cabinet approved the LHMA Refresh 2022-2037 in May 2024 prior to submission to Welsh Government. The housing team are currently awaiting sign off from Welsh Government

[28] Provides an uplift in younger (0-19, +880) and working age (30-49, +3,222) groups

Supporting Sustainable Economic Growth

6.3.10 Supporting sustainable economic growth is a key Council priority which will be achieved through a range of mechanisms and interventions including the RLDP, the Economy, Employment and Skills Strategy and the Local Transport Strategy.

6.3.11 The RLDP Growth Strategy seeks to address the issues currently impacting on economic growth, including a shrinking working age population and high levels of out-commuting, by allocating a minimum of 38ha of B use class employment land and setting out the planning policy framework to support job growth of up to 6,240 additional jobs over the Plan period (416 jobs per annum).

6.3.12 Reflecting the Growth Strategy, the jobs figure is based on a demographic-led scenario, which includes an adjustment to allow for higher in-migration from Bristol and South Gloucestershire (based on experience over the preceding five years) and a reduction in net out-commuting. The associated employment figure represents the number of jobs that could be supported by the population and housing growth planned for over the Plan period. The projected increase in the working age population and the linked dwelling requirement underpinning the growth strategy will provide scope for residents to live and work in the area, supporting up to 416 jobs per annum. The Employment Land Review (2022) confirms that the job figure is driven by policy interventions intended to support housing and employment growth to achieve an outcome which exceeds a continuation of trends.

6.3.13 The proposed level of growth aims to provide a balance of housing and employment growth, as required by national planning policy. This alignment means that economic growth will not be undermined by inadequate housing or be reliant on unjustified levels of in-commuting. Similarly, the level of housing will not give rise to high levels of out-commuting. Supporting this level of growth will reduce the need to travel and travel to work distances, which will assist in addressing our challenges in relation to the climate and nature emergency and contribute towards a more balanced demographic profile in Monmouthshire.

6.3.14 To assist in meeting this provision and to support the Council's economic growth ambitions, the RLDP allocates a deliverable range of B use class employment land in attractive, accessible, and sustainable locations across Monmouthshire and in the right quantities to attract new businesses in key growth sectors and to enable our existing businesses to grow, whilst being flexible to future changes. It is recognised that there is an increased propensity for agile and home working in some sectors over the longer term, meaning demand for physical employment land or space is changing.

6.3.15 Of note, while the RLDP makes provision for B use class employment land, not all of the job growth will be in these sectors. Many jobs will be delivered through foundational sectors such as tourism, leisure, food, retail, and agriculture, all of which play an important role in Monmouthshire's economy. This reflects the character of the wider economy of South East Wales and should be supported in line with the 'whole economy' approach that is advocated by national planning policy. The RLDP will plan positively for these sectors through complementary supportive policies.

6.3.16 Whilst the Strategy projects a growth in jobs over the Plan period, it has become widely accepted that the fundamental shift in working practices experienced as a legacy of the Covid-19 pandemic, with a significant increase in people working from home/remotely, has made it

less important where some jobs are located as employees no longer need to commute for work in many cases. This has provided the opportunity for many people to live and work in the same location via a remote working approach.

6.3.17 It is expected that the trend for increased home and remote working will continue over the longer term in accordance with Welsh Government's ambition of 30% of the Welsh workforce working from or near home[29], making it less important where the jobs are located as commuting is reduced as a result of changing working habits. This will also assist in addressing our challenges in relation to the climate and nature emergency.

6.3.18 Increased remote/home working will mean both employers and employees will have greater flexibility over where to locate with quality of life and environment potentially becoming increasingly important to Monmouthshire's benefit. Monmouthshire is a very attractive proposition and stands to gain from an increased economically active population without the associated problems of increased commuting. Local businesses and services would benefit from increased custom and footfall with workers spending their wages in their local areas helping to create vibrant neighbourhoods and sense of place. Notwithstanding this, there remains a need to provide a sufficient range and choice of employment land in the County as not all businesses are able to operate remotely.

6.3.19 The RLDP Growth Strategy promotes sustainable economic growth that will help reduce levels of commuting and promote self-contained communities, ensuring the environmental, social and economic sustainability of our communities. This will be achieved by providing policy support to enable and facilitate home/remote working, enabling economic growth through supporting the delivery of the priorities and aims identified in the Council's Economy, Employment and Skills Strategy, Local Transport Strategy and Climate and Decarbonisation Strategy, maximising opportunities from regional partnerships and providing appropriate B use class employment land in the right locations.

6.4 RLDP Sustainable and Resilient Communities Spatial Strategy

6.4.1 Strategic Policy S2 sets out the RLDP Spatial Strategy.

Strategic Policy S2 – Spatial Distribution of Development – Settlement Hierarchy

In order to deliver sustainable and resilient communities for all, the main focus for new development will be distributed based on the following settlement hierarchy:

		Distribution of Residential Growth*		Distribution of Employment Growth	
Settlement Hierarchy		Indicative % of distribution	Indicative No. of homes	% of distribution	Hectares
Tier 1	**Primary Settlements:** • Abergavenny	22%	1,362	3%	1.7ha**

[29] Smarter Working: a Remote Working Strategy for Wales, Welsh Government (2022)

	(inc. Llanfoist) • Chepstow • Monmouth *(inc. Wyesham)* • Caldicot *(inc. Severnside Area comprising of: Caerwent, Crick, Magor Undy, Portskewett, Rogiet and Sudbrook)*	13% 15% 35% across Severnside Area	829 923 2,190 across Severnside Area	11% 10% 65%	6.4ha 5.84ha 37.86ha
Tier 2	**Secondary Settlements:** • Penperlleni • Raglan • Usk	6% across Secondary Settlements	350 across Secondary Settlements	10%	6.05ha
Tier 3	**Main Rural Settlements:** • Devauden • Dingestow • Little Mill • Llandogo • Llanellen • Llangybi • Llanover • Llanvair Discoed • Mathern • Pwllmeyric • Shirenewton/ Mynyddbach • St Arvans • Tintern • Trellech • Werngifford/Pandy	9% across Main Rural and Minor Rural Settlements (Tiers 3 and 4)	556 across Main Rural and Minor Rural Settlements (Tiers 3 and 4)	0%	0ha
Tier 4	**Minor Rural Settlements:** • Bettws Newydd • Broadstone /Catbrook • Brynygwenin • Coed y Paen • Cross Ash • Cuckoo's Row • Great Oak • Grosmont • Gwehelog • Llanarth • Llanddewi Rhydderch • Llandegveth				

	• Llandenny • Llangwm • Llanishen • Llansoy • Llantilio Crossenny • Llantrisant • Llanvair Kilgeddin • Llanvapley • Mitchel Troy • Penallt • Penpergwm • The Bryn • The Narth • Tredunnock				

Settlement boundaries will be defined for Settlement Tiers 1 – 3, within which the principle of development is considered to be acceptable, subject to detailed policy considerations set out in the RLDP.

Within Tier 4 – Minor Rural Settlements, minor infilling between existing buildings will be considered acceptable, subject to detailed policy considerations set out in the RLDP.

Outside of Tiers 1 – 4, open countryside policies will apply where planning permission will only be allowed for the following types of development, subject to satisfying detailed planning criteria:

- Acceptable conversions of rural buildings
- Sub-division of existing dwellings
- Rural Enterprise Dwellings
- One Planet Development
- Rural diversification and rural enterprise uses
- Affordable housing exception sites adjoining settlement boundaries to meet local needs
- Gypsy and Traveller Sites

*Figures include an indicative 15% flexibility.
**The Council will continue to explore opportunities to bring forward vacant premises in Abergavenny for employment use, in conjunction with the CCR/relevant partners.

6.4.2 Policy S2 seeks to focus new development in the primary settlements of Abergavenny (including Llanfoist), Chepstow, Monmouth and Caldicot including the Severnside area, together with a lower level of growth in the most sustainable lower tier settlements to deliver much needed affordable homes and to address rural inequality and rural isolation in these areas. It sets out the proportion of residential growth to be accommodated by each of the settlement tiers (a full breakdown is available in the Housing Background Paper). As such, the spatial strategy will assist in addressing our core issues in relation to affordable housing delivery, rebalancing our demography, responding to the climate and nature emergency and supporting sustainable economic growth.

6.4.3 The Settlement Hierarchy reflects the findings of the Sustainable Settlement Appraisal[30], which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. The appraisal sets out the methodology used to assess the sustainability of each settlement, based on three primary principles. It also sets out settlement profiles for each settlement which includes a range of social and economic data along with the services and facilities available. The appraisal confirms the dominant role of the primary settlements of Abergavenny, Chepstow, Caldicot and Monmouth, reflecting the range of services, facilities and transport available. It recognises that some of the lower tier settlements have a close geographical and functional relationship with a Tier 1 settlement which have therefore been clustered together. The settlements in the south of the County in particular exhibit a strong geographical and functional relationship and collectively form the Severnside Area centred around the primary settlement of Caldicot and includes Magor Undy, Rogiet, Caerwent, Portskewett, Sudbrook and Crick. Similarly, the appraisal recognises the strong relationship between Abergavenny and Llanfoist and Monmouth and Wyesham.

6.4.4 The spatial strategy and identification of suitable sites for allocation in the RLDP reflect the site search sequence outlined in national planning policy. In determining whether or not to allocate particular sites for development, consideration has been given to such issues as their impact on the physical form of the settlement, placemaking, carbon footprint, landscape setting, affordable housing need, environmental constraints and infrastructure capacity. Where growth cannot be met in an individual settlement, development is directed toward a same tier or higher tier settlement within the same Housing Market Area.

6.4.5 Placemaking principles will underpin the delivery of sites in the RLDP ensuring that we deliver sustainable, attractive and accessible places to live and work. Monmouthshire County Council is a signatory of the Placemaking Charter which recognises the Council's commitment to support placemaking in relevant areas of our work and promotes the six placemaking principles in the planning, design and management of new and existing places.

6.4.6 To encourage the promotion of sustainable and resilient communities where residents can live and work in the same area, housing growth is accompanied by employment land, where appropriate (as set out in Policy S2). Further details on employment sites provision can found in Policy S12.

6.4.7 In accordance with the PPW12's site search sequence, development proposals are expected to make full and appropriate use of land, with preference given to the development of previously developed land. It is, however, recognised that there are limited opportunities for further significant brownfield development in Monmouthshire. While growth is focused in the most sustainable settlements, it must be recognised that landscape quality and agricultural land quality are high throughout the County, and as such these challenges cannot be avoided via a different spatial option. For example, all of our settlements are surrounded by agricultural land with a high-level classification as best and most versatile land. Rather, the Deposit Plan allocates those sites that are the best connected, most sustainable, best deliver placemaking and are least harmful, which has required balanced planning considerations and decisions with a preference for promoting the most sustainable sites.

[30] The Sustainable Settlement Appraisal can be viewed on the Council's website.

6.4.8 Future Wales 2040 (Policy 34) requires the future South East Wales Strategic Development Plan (SDP) to identify a Green Belt to the north of Cardiff, Newport and the eastern part of the region to manage urban form and growth. The South East Wales Regional Strategic Diagram set out in Future Wales indicates the indicative extent of the Green Belt in the region which includes part of rural Monmouthshire. The Spatial Strategy has regard to Policy 34 and the indicative Green Belt boundary. Monmouthshire's primary settlements fall outside of the indicative Green Belt boundary. National planning policy allows for extensions to existing settlements within and adjoining the Green Belt of an appropriate scale having regard to the identified and longer term need for development land, the effects of development pressures in areas beyond the Green Belt, the need to minimise demand for travel, and the purpose of the overall greenbelt designation. It states that this may require land to be safeguarded and boundaries of proposed Green Belts must be carefully defined to achieve this. Potential Green Belt land is to be assessed and designated as part of a Strategic Development Plan (SDP) for the South East Wales Region.

6.4.9 Table 2 sets out a summary of the overarching spatial distribution of housing provision for the RLDP. A full breakdown of each component is set out in the Housing Background Paper.

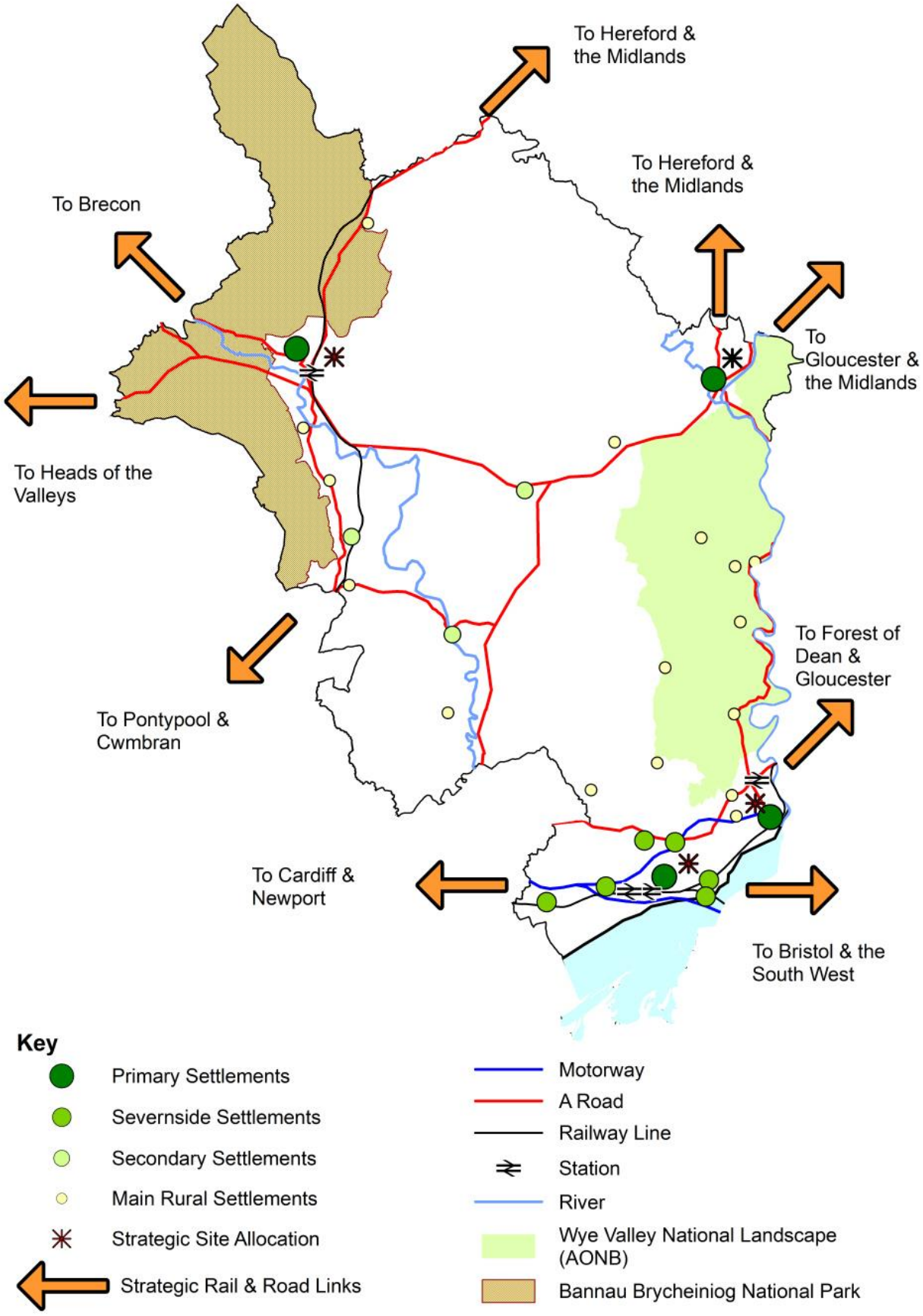
Table 2: Summary of Spatial Distribution of Housing Provision*

Settlement	Commitment		Allowances	Allocations		
	Completions 2018-2023	Existing Commit-ments	Total Allowances (Small Sites; Windfalls)	LDP Rollover Allocations	RLDP New Housing Allocations (Dwellings)	Total RLDP Housing Provision
Abergavenny (incl. Llanfoist)	537	29	196	0	600	1,362
Chepstow	448	81	154	0	146	829
Monmouth (incl. Wyesham)	286	70	77	160	330	923
Caldicot (incl. Severnside)	663	555	162	0	810	2,190
Secondary Settlements	109	38	67	0	136	350
Rural Settlements	177	25	231	15**	108**	556
Total	**2,220**	**798**	**887**	**175**	**2,130**	**6,210**

*Figures include an indicative 15% flexibility allowance.
** Rural LDP Rollover Allocations and RLDP New Housing Allocations are all within Tier 3 Main Rural Settlements

6.4.10 The RLDP Growth and Spatial Strategy is illustrated in the Strategic Diagram below.

Figure 2 - RLDP Strategic Diagram



S1 and S2 - Links to Wider Policy Framework	
RLDP Objectives	Objective 1 – Economic Growth/Employment Objective 9 – Demography Objective 10 – Housing Objective 11 – Placemaking Objective 12 – Communities Objective 13 – Rural Communities Objective 15 – Accessibility
Future Wales: The National Plan 2040 (WG, February 2021)	Policy 1 – Where Wales will Grow Policy 3 – Supporting Urban Growth and Regeneration – Public Sector Leadership Policy 4 – Supporting Rural Communities Policy 5 – Supporting the Rural Economy Policy 7 – Delivering Affordable Homes Policy 34 - Green Belts in the South East
Planning Policy Wales Edition 12 (WG, February 2024)	Strategic and Spatial Choices Theme (Chapter 3)
Well-being of Future Generations Act (WBFGA) (WG, 2015)	A prosperous Wales A resilient Wales A more equal Wales A Wales of cohesive communities
Gwent PSB Well-being Plan (August 2023)	• Take action to reduce the cost-of-living crisis in the long term. • Provide and enable the supply of good quality, affordable, appropriate homes. • Take action to reduce our carbon emissions, help Gwent adapt to climate change, and protect and restore our natural environment. • Take action to address inequalities, particularly in relation to health, through the framework of the Marmot Principles. • Enable and support people, neighbourhoods, and communities to be resilient, connected, thriving and safe.
Taking Monmouthshire Forward - Community and Corporate Plan 2022 - 2028 (April 2023)	These policies support the Community and Corporate Plan objectives of ensuring Monmouthshire is a: • fair place to live where the effects of inequality and poverty have been reduced;

	• green place to live and work with reduced carbon emissions, making a positive contribution to addressing the climate and nature emergency; • thriving and ambitious place, full of hope and enterprise; • safe place to live where people have a home they feel secure in; • connected place where people feel part of a community, are valued and connected to other.
Key Evidence	Growth and Spatial Options Paper – September 2022 Updating the RLDP Demographic Evidence Report, Edge Analytics November 2021 Housing Background Paper – October 2024 Sustainable Settlement Appraisal – December 2022 Candidate Sites Register (Second Call) – February 2022 Review of Second Call Candidate Sites against the Preferred Strategy – December 2022 Candidate Sites Assessment Report – October 2024

7. Managing Settlement Form

7.1 New built development in the open countryside

7.1.1 It is recognised that there may be exceptional circumstances where new built development may be acceptable in the open countryside for the benefit of the rural economy and sustaining our rural communities. Although well designed schemes can often conserve and enhance biodiversity and landscape quality there is potential to cause negative impacts. It is essential, therefore, that any such development is not at the expense of environmental considerations, including landscape, biodiversity, local amenity and historic, cultural or geological heritage. Where the only option is to provide a new building, careful attention should be given to siting, design and materials to minimise impacts on nature conservation and the surrounding landscape.

7.1.2 Policy OC1 sets out strict criteria for assessing such proposals and seeks to ensure a balance between the need to support rural enterprises, tourism and leisure facilities and rural communities and the need to protect the local environment and character of the open countryside. Proposals that do not accord with the criteria set out in this policy will not be permitted.

7.1.3 The open countryside for the purposes of the RLDP is defined as land lying outside the defined settlement boundaries of the Primary, Secondary and Main Rural settlements or the physical boundaries of Minor Rural settlements, as set out in Policy S2.

Policy OC1 – New built development in the Open Countryside

There is a presumption against new built development in the open countryside, unless justified under national planning policy.

Proposals for new built development in the open countryside will only be permitted where justified under national planning policy and all the following criteria are met:

a) the proposal is satisfactorily assimilated into the landscape and complies with Policies LC1, GI1, T1, RE3, RE4 and NR1;

b) new buildings are wherever possible located within or close to existing groups of buildings;

c) the development design is of a form, bulk, size, layout and scale that respects the character of the surrounding countryside; and

d) the development will have no unacceptable adverse impact on landscape, historic / cultural or geological heritage, biodiversity, dark skies and local amenity value.

7.2 Green Wedges

7.2.1 National planning policy sets out the importance of managing settlement form and notes that around settlements there may be a need for development plans to include additional protection where alternative policy mechanisms, such as settlement boundaries and open

countryside policies, would not be sufficiently robust to maintain countryside openness and prevent urban sprawl via the designation of green belt and/or green wedge land.

7.2.2 While green belt land is to be assessed and designated as part of a Strategic Development Plan (SDP) for the South East Wales Region as set out in Future Wales Policy 34, PPW12 advises that green wedge designations should be reviewed and proposed through the local development plan process.

7.2.3 The existing green wedges have therefore been reviewed to assess whether these continue to meet the purposes as defined in PPW12. The review also assessed the potential for new wedge designations in accordance with the provisions of national planning policy that "green wedges may be used to provide a buffer between the settlement edge and statutory designations and safeguard important views into and out of the area." As such, land between the settlement edge of Abergavenny and the Bannau Brycheiniog National Park (BBNP) boundary has been assessed for its potential for green wedge designation.

Policy GW1 – Green Wedge Designations

Green Wedges have been designated in the land between the following areas, as shown on the Proposals Map.

a) Abergavenny, Llanfoist and the BBNP boundary;
b) Chepstow, Pwllmeyric and Mathern;
c) Portskewett and Sudbrook;
d) Rogiet and Caldicot;
e) Shirenewton and Mynyddbach
f) Undy, Llanfihangel Rogiet and Rogiet.

There is a presumption against new built development within green wedge designations unless exceptionally justified under national planning policy.

Placemaking And Design

8. Sustainable Placemaking and High-Quality Design

8.1 Sustainable Placemaking

8.1.1 Monmouthshire is renowned for its distinctive identity and the high quality of its natural, historic and built environments. This policy is intended to protect and enhance the quality of the County's settlements and countryside by ensuring that new development is designed to a high standard that creates buildings and places that are sustainable, well-integrated within their context and contribute to the economic, social, environmental and cultural well-being of strong, vibrant and healthy communities. The Plan seeks to achieve this by ensuring new development incorporates the principles of sustainable placemaking and good design.

8.1.2 The RLDP strategy and policies seek high quality sustainable design and green infrastructure and will place people, natural resources and the natural environment at the heart of the design process. Proposals should embrace a green infrastructure-led approach that is capable of delivering a wide range of social, economic, environmental, and health and well-being benefits for local communities and the County as a whole. This will enhance the character and identity of Monmouthshire's settlements and countryside, encourage sustainable lifestyles and create attractive, safe and accessible places. The achievement of this will depend largely upon identifying and understanding the local characteristics which are distinctive to an area: a green infrastructure approach to design will be essential to delivering placemaking. A Placemaking Wales Charter has been developed by Welsh Government and the Design Commission for Wales in collaboration with the Placemaking Wales Partnership: the Council is a charter signatory to these principles.

Strategic Policy S3 – Sustainable Placemaking & High Quality Design

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. In order to achieve this, development must:

i) Incorporate high quality, sustainable, safe and inclusive design that offers ease of access for all and provides connectivity between uses;

ii) Incorporate an appropriate mix of uses, where applicable, to minimise the need to travel and to maximise opportunities for sustainable travel;

iii) Incorporate a green infrastructure-led approach that respects local distinctiveness and the character of the site and its surroundings; and

iv) 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.

8.2 Creating Well-designed Places

8.2.1 One of the key principles in PPW12 is achieving the right development in the right place. The creation of well-designed places plays an important role in well-being and can help aide community cohesion by ensuring places have a balance of uses where people can live, work and socialise.

Policy PM1 – Creating well-designed places

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. Development proposals will be required to:

a) respect the existing form, scale, siting, height, massing, materials (including colour) and layout of its setting;

b) ensure a safe, secure, pleasant and accessible environment for all members of the community supporting the principles of community safety and maximising opportunities for connectivity to the wider environment;

c) contribute towards a sense of place and identity whilst ensuring that the location, scale, amount, mix of use and density of development, including cumulative impact, is compatible with existing uses and its local context;

d) respect and enhance local distinctiveness and landscape character as defined through the LANDMAP process, particularly where built and natural views, panoramas or historical features are present;

e) maintain reasonable levels of privacy and amenity of occupiers of neighbouring properties, where applicable;

f) ensure that existing residential areas are protected from overdevelopment and insensitive or inappropriate infilling;

g) Integrate multifunctional green and blue infrastructure and public open space within site boundaries, providing connectivity to wider networks as appropriate.

8.2.2 In the application of this policy regard should be given to design considerations set out in national planning policy including PPW12 and TAN12 Design. Reference should also be given to LANDMAP Landscape Character Assessments, where appropriate. This will help ensure that new development meets the expectations of this Plan, is fully integrated into its environment, taking account of the character of the area and provides locally distinctive design solutions. In accordance with national planning policy, development proposals should include a Design and Access Statement where appropriate. These statements enable applicants to demonstrate the design process undertaken and how the objectives of good design and placemaking have been considered in the process. These statements will vary according to the scale and complexity of the application and are 'living' documents which can be updated as necessary. Where such statements are not required, design and placemaking must still be taken into account in accordance with Policy PM1, as well as other relevant policies.

8.2.3 This policy will be supported by SPG which will set out detailed design requirements and must be referred to as appropriate.

8.3 Amenity and Environmental Protection

8.3.1 Policy PM2 seeks to prevent development proposals that would result in unacceptable risk or harm due to air, light, noise or water pollution or contamination. The policy will prevent incompatible land uses and development being located in proximity to existing sources of pollution. Similarly, it will prevent inappropriate development on or in proximity to potentially contaminated land.

8.3.2 Although air quality in Monmouthshire generally meets current standards, there are two Air Quality Management Areas (AQMA) within the County – at Bridge Street in Usk and Hardwick Hill /Mount Pleasant in Chepstow (as shown on the Constraints Map). Where it is considered that a development proposal may impact upon an AQMA, or exacerbate an existing problem, developers will be required to provide an assessment of air quality impact, together with proposals for mitigation.

Policy PM2– Environmental Amenity

Development proposals that would cause or result in a significant risk/harm to local amenity, health, the character/quality of the countryside or interests of nature conservation, landscape or built heritage importance, due to the following, will not be permitted unless it can be demonstrated that measures can be taken to overcome any significant risk:

- Air pollution;
- Light pollution;
- Noise pollution;

- Water pollution;
- Contamination.

8.4 Advertisements

8.4.1 This policy sets out detailed criteria for assessing advertisement proposals and aims to ensure that such proposals are strictly controlled in order to protect the special quality, character and distinctiveness of the County. Particular scrutiny will be given to proposals affecting the Blaenavon Industrial Landscape World Heritage Site, Bannau Brycheiniog National Park and the Wye Valley National Landscape (AONB), as detailed in policies LC2, LC3 and LC4. Policy PM3 has a broad remit and relates to all forms of advertisements where planning permission is required. Further guidance on the control of outdoor advertisements is set out in national planning guidance and should be referred to accordingly.

Policy PM3 – Advertisements

Proposals for advertisements will only be permitted where:

a) having regard to the existing number and siting of advertisements in the locality the proposal would not result in an unacceptable clutter of advertisements;

b) existing means of support are used for signs, wherever possible;

c) if located within the open countryside they would not unacceptably detract from the rural setting of the locality;

d) if located in a Conservation Area, they would not unacceptably detract from the character or appearance of the area;

e) if located within the open countryside or a Conservation Area, externally lit signs are only appropriate to enable signposting to uses trading outside of daylight hours;

f) there would no adverse impact on public or highway safety.

Proposals for bilingual signs and advertisements will be supported in principle, subject to detailed planning considerations.

8.4.2 It is recognised that well designed signage can add to visual interest in the context of a street scene, however too many signs can amount to visual clutter. As a result, criterion b) aims to ensure existing frames, poles, brackets and hanging equipment is utilised where possible to minimise any impact.

8.4.3 For signage within the open countryside or Conservation Areas external illumination is only appropriate to uses that are reasonably expected to trade outside of daylight hours, which differs substantially between seasons. Policy LC5 relates to dark skies and lighting and should also be referred to.

8.4.4 As a Welsh border County, the distinctive culture and identity of Monmouthshire can be promoted through bilingual signage and advertising. Proposals for bilingual signs are therefore

encouraged and supported in principle to safeguard and positively enhance the Welsh language.

8.5 Historic Environment

8.5.1 Monmouthshire has a rich built heritage and historic environment which includes 31 Conservation Areas, 48 Historic Parks and Gardens, 3 Landscapes of Outstanding Historic Interest, approximately 164 Scheduled Ancient Monuments (SAMs) and 2,145 Listed Buildings.

8.5.2 There is a need to protect, promote and enhance the best of our historic environments which are an important part of Monmouthshire's culture making it a unique and attractive place to live, the historic environment also plays a key role in sustainable tourism and economic growth.

8.5.3 Chapter 6 of PPW12 relating to Conserving and Enhancing the Historic Environment and its Assets provides the national planning policy framework for Listed Buildings, Scheduled Ancient Monuments and archaeological remains, Historic Parks and Gardens, Historic Landscapes and World Heritage Sites. Any development proposals that may affect these heritage assets or their settings, must consider The Historic Environment (Wales) Act 2016 and associated national guidance, including Chapter 6 of PPW12 and TAN24: The Historic Environment.

8.5.4 Listed Building or Conservation Area Consent applications must be accompanied by a Heritage Impact Statement in accordance with the Historic Environment (Wales) Act 2016.

Historic Parks and Gardens

8.5.5 The Cadw statutory register (February 2023) identifies Historic Parks and Gardens of special historic interest, 48 of which (March 2024) are located in Monmouthshire and identified on the Constraints Map accordingly. Information within the Cadw Register must be taken into account when considering the implications of development upon these historic assets and their settings.

Historic Landscapes

8.5.6 Cadw has also produced a separate register identifying Landscapes of Outstanding Historic Interest in Wales. Information within the Cadw Register must be taken into account when considering the implications of development upon these historic assets and their settings. The following Historic Landscapes have been identified within Monmouthshire:

- Blaenavon (Blaenavon Industrial Landscape World Heritage Site)
- The Gwent Levels (Gwent Levels Historic Landscape of Outstanding Historic Interest)
- The Lower Wye Valley

Listed Buildings

8.5.7 Listed buildings are designated by Cadw who maintain the statutory List of Buildings with Special Architectural or Historic Interest. National should be referred to accordingly in relation to any proposals that may affect Listed Buildings or their settings.

8.6 Conservation Areas

8.6.1 The 31 Conservation Areas within Monmouthshire include a wide spectrum of different areas, from market towns and rural villages to medieval castles. These are listed below with their boundaries identified on the proposals Map.

Abergavenny Town	Pen-y-Fal, Abergavenny	Rogiet Llanfihangel
Bettws Newydd	Llandogo	St Arvans
Caerwent	Llanhennock	Shirenewton
Caldicot Castle	Llanover	Skenfrith
Chepstow	Llantilio Crossenny	Tintern
Dixton	Magor	Tredunnock
Grosmont	Mathern	Trellech
Hendre	Monmouth	Usk
Itton	Mounton	Whitebrook
Llanarth	Raglan	
Llandenny	Rockfield	

8.6.2 Given the significant number of Conservation Areas within Monmouthshire and their contribution to the County's special qualities and distinctive character, it is essential to protect and enhance their character and appearance. Policy HE1 sets out detailed criteria for assessing development proposals in Conservation Areas and, where appropriate, aims to ensure that the findings of Monmouthshire's Conservation Area Appraisals are fully taken into account when considering development proposals. In the assessment of planning applications, the Council will seek to preserve or enhance the special character or appearance of Conservation Areas. Chapter 6 of PPW12 relating to Conserving and Enhancing the Historic Environment and its Assets provides the national planning policy framework in relation to Conservation Areas and should also be considered.

8.6.3 Monmouthshire's Conservation Area Appraisals identify the special qualities of the designated Conservation Area. Development proposals must be able to respect and preserve important views and vistas as identified in the appraisals. Views could be narrow or glimpsed sightings of, for example, key landmark buildings or landscape features. Vistas could be wider or panoramic views that provide perspective or context and create the setting of a Conservation Area. All Conservation Areas will have a key setting individual to each area, development proposals should consider this unique context whether this be of an urban or rural setting and consider height, scale, massing and grain accordingly.

8.6.4 Proposals for development must demonstrate their ability to preserve or enhance the special character or appearance of the area. The character of an area can be defined by the distinctive qualities of a place, including use, activity, setting and connection to its surroundings. The architectural styles and language of buildings within the area form the appearance of streets, squares, lanes and open spaces. Physical alterations to buildings can affect their appearance which in turn can affect the character of these Conservation Areas. Development proposals seeking to enhance areas of poor character or appearance within Conservation Areas will be welcomed.

Policy HE1 – Conservation Areas

Development including proposals for alterations, extensions or conversions of existing buildings within Conservation Areas or their settings must preserve or enhance the character or appearance[31] of the Conservation Area. They must also have regard to the Conservation Area Appraisal for that area.

Development proposals within Conservation Areas will be permitted if they meet all of the following criteria:

a) have no adverse effect on important views into and out of the Conservation Area;

b) have no adverse effect on important vistas within and out of the area and the character and appearance of the street scene and roofscape, townscape or landscape setting;

c) pay special attention to complementing or reflecting the special architectural qualities and distinctiveness of the Conservation Area including development pattern, profile, form, scale, mass, detailing and materials;

d) pay special attention to the setting of the development and its open areas;

e) retain, restore or reinstate historic features and details of buildings, including garden or forecourt features, boundary walls, paving etc. as appropriate.

Parking and servicing arrangements associated with new uses must not detract from the character or appearance of the Conservation Area. High quality modern design may be acceptable, particularly where new compositions and points of interest are created.

Permission will be refused where proposals are unsympathetic to an existing building and/or detract from the character or appearance of the Conservation Area.

Specialist recording, archiving and publishing may be required prior to the demolition of any historic building within a Conservation Area and may be required in other cases of alteration.

8.7 Design of Shop Fronts in Conservation Areas

[31] Section 72 of the Planning (Listed Buildings and Conservation Area) Act 1990 test refers to preserve or enhance character or appearance.

8.7.1 This policy seeks to maintain high standards of shop front design in Conservation Areas. Shop fronts are an important element in the character and appearance of Conservation Areas and it is important that their design respects the historic and architectural form of the street scene and the individual buildings in which the shops are set.

Policy HE2 – Design of Shop Fronts in Conservation Areas

In Conservation Areas the removal of traditional shop fronts will not be permitted.

Improvements to non-traditional shop fronts will be permitted where they retain historic features and the proposed improvements are in character with the area. Proposals to replace modern shop fronts will be permitted where they meet the following criteria:

a) reinstate or restore lost details which will enhance the Conservation Area;

b) use traditional arrangement, materials and paint colours;

c) integrate positively with the surrounding area, and where it replaces two or more units, respects the character of individual units;

d) have fascia boards and signage in keeping with the design, materials and scale of the character of the building in which they are set; and

e) use unobtrusive security measures such as internal shutters, toughened glass or traditional timber shutters.

f) do not incorporate internal illumination and any external illumination where necessary for night time trading is externally mounted and is of a scale, design and lux level appropriate to the building and shop front.

Archaeological Sensitive Areas

8.7.2 Monmouthshire also has a significant archaeological resource, with 12 Archaeologically Sensitive Areas (ASAs) across the County. The ASAs are located in Abergavenny, Caerwent, Chepstow, Grosmont, Monmouth, Raglan, Skenfrith, Tintern, The Gwent Levels, Trellech, Usk and Whitecastle. An Archaeology Planning Advisory Note (PAN) was endorsed by the Council in August 2020 providing guidance on archaeology in Monmouthshire and detail on how archaeology is addressed in the planning process which must be taken into consideration in development proposals.

Scheduled Ancient Monuments

8.7.3 There are approximately 164 Scheduled Ancient Monuments (SAMs) within Monmouthshire. SAM consent is required for all proposals that would potentially alter a SAM. National policy should be referred to accordingly in relation to any proposals that may affect SAMs.

8.7.4 Consultation with Glamorgan Gwent Archaeological Trust (GGAT), who act as archaeological advisors to the Local Planning Authority (LPA), is strongly recommended at the earliest stage of development proposals in relation to ASAs and SAMs.

8.8 Roman Town of Caerwent

8.8.1 This policy seeks to preserve the special and unique character of the Roman Town of Caerwent, in order to ensure that the remains of the town are left undisturbed and that its special character and openness is preserved.

8.8.2 The remains of the Roman town of Caerwent are acknowledged to be of European significance and to constitute one of the most important archaeological sites in Wales. The greater part of the Roman town has been designated as a Scheduled Ancient Monument (SAM). There has been a presumption against development within the Roman Town walls or in their vicinity since the 1954 Monmouthshire County Development Plan. The RLDP continues this aim to ensure that the remains are left undisturbed.

8.8.3 The distinctive character and appearance of this part of the Conservation Area is assessed further in the Caerwent Conservation Area Appraisal.

Policy HE3 – Roman Town of Caerwent

Development within or adjacent to the walls and ditches of the Roman Town at Caerwent will only be permitted where it can be demonstrated:

a) That the archaeological remains are left undisturbed; and

b) That the special character and openness of the Caerwent Conservation Area is preserved or enhanced in accordance with the Caerwent Conservation Area Appraisal.

S3 - Links to Wider Policy Framework	
RLDP Objectives	Objective 3 – Green Infrastructure, Biodiversity and Landscape Objective 8 – Health and Well-being Objective 11 – Place-making Objective 12 – Communities Objective 13 – Rural Communities Objective 15 – Accessibility Objective 16 – Culture, Heritage and Welsh Language Objective 17 – Climate Change
Future Wales: The National Plan 2040 (WG, February 2021)	Policy 2 – Shaping Urban Growth and Regeneration – Strategic Placemaking Policy 4 – Supporting Rural Communities
Planning Policy Wales Edition 12 (WG, February 2024)	People and Places: Achieving Well-being Through Placemaking (Chapter 2) Strategic and Spatial Choices Theme (Chapter 3)- Placemaking In Action: Good Design Making Better Places Distinctive and Natural Theme - Historic Environment (Chapter 6)

Well-being of Future Generations Act (WBFGA) (WG, 2015)	A Resilient Wales A Healthier Wales A Wales of Cohesive Communities A Wales of vibrant culture and thriving Welsh Language
Gwent PSB Well-being Plan (August 2023)	• Enable and support people, neighbourhoods, and communities to be resilient, connected, thriving and safe. • Take action to address inequities, particularly in relation to health, through the framework of the Marmot Principles. • Take action to reduce our carbon emissions, help Gwent adapt to climate change, and protect and restore our natural environment.
Taking Monmouthshire Forward - Community and Corporate Plan 2022 - 2028 (April 2023)	This policy supports the Community and Corporate Plan objectives of ensuring Monmouthshire is a: • A Green place to live and work, with reduced carbon emissions, and making a positive contribution to addressing the climate and nature emergency; • A Safe place to live where people have a home and community where they feel secure; • A Connected place where people feel part of a community and are valued.
Key Evidence	Conservation Area Appraisals Cadw Statutory Register for Historic Parks and Gardens (2023) Cadw Register of Landscapes of Outstanding Historic Interest in Wales TAN12 Design TAN24 The Historic Environment Guide to Good Practice on using the Register of Landscapes of Historic Landscapes of Historic Interest in Wales in the Planning and Development Process

9. Climate Change

9.1.1 The need to tackle climate change represents a fundamental challenge if sustainable development and the obligations under the Well-being of Future Generations Act 2015 are to be delivered. One of the themes embodied in the Well-being of Future Generations Act is the need for 'a resilient Wales' whereby there is capacity to adapt to change such as climate change. A key principle of sustainable development, as recognised in PPW12, is tackling climate change by reducing the greenhouse gas emissions that cause climate change and ensuring that places are resilient to the consequences of climate change. National guidance outlines how the planning system can play an important part in improving sustainability of new developments whilst also tackling climate change. The RLDP provides a positive planning policy framework to support and enable this approach.

9.1.2 In May 2019 Monmouthshire County Council passed a motion declaring a climate emergency and has committed to strive to limit the increase in global temperatures to 1.5°C. In November 2021 this was broadened to incorporate a strengthened emphasis on nature recovery in recognition of the nature emergency and the relationship between the two. In recognition of the water quality issues in the County, a Motion for Rivers and Ocean was declared by Council in March 2022 with an action plan agreed by Council in September 2022 to outline steps the Council will take to protect our rivers and ocean. In May 2024 the Climate and Nature Emergency Strategy was published to update and combine the strategies and better reflect the Community and Corporate Plan. The updated overarching strategy is underpinned by four work streams and action plans: Council Emissions, Nature Recovery, Rivers and Ocean and Communities and Climate.

Strategic Policy S4 – Climate Change

All development proposals will be required to address the causes of, and adapt to the impacts of, climate change. Means of achieving this will include:

i) Avoiding locating development in areas at risk of flooding, or where appropriate, minimising the risk of flooding including the incorporation of measures such as Sustainable Drainage Systems (SuDs) and flood resilient design;

ii) Incorporating low/zero carbon energy requirements by reducing energy demand and promoting energy efficiency through the design of buildings by prioritising fabric first and orientation design principles;

iii) Supporting the development of renewable and low/zero carbon energy generation and storage and a presumption against energy generation utilising fossil fuels, fracking and methods that are not low/zero carbon;

iv) Utilising sustainable construction techniques and local supplies through the adoption of the circular economy principles, where possible;

v) Incorporating water efficiency measures and minimising adverse impacts on water resources and quality;

vi) Using land efficiently and co-locating uses to minimise the overall need to travel and maximise opportunities for sustainable travel;

vii) Providing ultra-low emission vehicles charging infrastructure to reduce emissions and improve air quality; and

viii) Supporting the resilience of development through green infrastructure solutions, including opportunities for biodiversity and resilient ecosystems, greenspace provision and connectivity, and water resource management.

9.1.3 Policy S4 builds on a number of actions from the Climate and Nature Emergency Strategy and draws together specific sustainability issues in relation to energy use and generation, efficient resource use and flood risk and provides a framework for sustainable growth which seeks to enable development that both mitigates the causes of climate change and is able to adapt to its likely effects. Such an approach is essential in ensuring that Monmouthshire meets its commitments contained within the Monmouthshire declaration on Climate Emergency (Nov 2021) and the economic, environmental and social objectives of the RLDP.

9.1.4 The RLDP recognises that the sustainability issues covered by Policy S4 are only part of the solution to addressing climate change, and while the planning system has an important role to play in this agenda, actions by individuals, communities and other organisations outside of the planning system are vital. We recognise that the climate emergency and nature emergency are intrinsically linked and that the principles of sustainable development are wide-ranging and include such aspects as transport, green infrastructure and the natural environment. These principles are dealt within the Plan's other Strategic Policies, including S3 – Sustainable Placemaking and High Quality Design, S9 – Sustainable Transport and S17 – Green Infrastructure, Landscape and Nature Conservation and are therefore not repeated in this policy. These policies should be considered as a whole.

9.1.5 Following new evidence regarding the environmental impacts of phosphate in watercourses Natural Resources Wales (NRW) has adopted tighter targets for the water quality of the River Usk and River Wye. In this respect, development proposals have to ensure that there will be no adverse effects on the site integrity of the two riverine SACs, the River Usk SAC and the River Wye SAC, regarding water quantity, level and flow. In particular, development will not be permitted if it cannot be accommodated under the Review of Consents for flow in these rivers, including the maximum permissible percentage reduction from naturalised flow levels and hands-off flow conditions.

9.2 Net Zero Carbon Homes

9.2.1 Policy NZ1 below seeks to ensure that new homes are built to the highest energy efficiency standards and utilise renewable energy sources for their 'regulated energy' (heating, hot water, lighting). The UK has a statutory target for reducing greenhouse gas emissions to net zero by 2050 (as set out in the Climate Change Act 2008, as amended) and ensuring that we build homes to the highest possible standard, alongside the de-carbonisation of the national grid, will contribute to achieving this target. PPW12 sets out that Welsh Government expect all new development to mitigate the causes of climate change in accordance with the Energy Hierarchy for planning. Reducing energy demand and increasing energy efficiency will ensure a more sustainable form of development that has a lower carbon footprint. Welsh Government encourage Local Planning Authorities (LPAs) to bring forward higher standards than the national minimum, which are set out in Building Regulations, in order to achieve a higher energy efficiency standard of building. This policy will ensure that new homes built within Monmouthshire mitigate the causes of climate change, by reducing energy demand through energy efficient building fabric, decarbonising the heating systems in place of gas boilers or fossil fuel alternatives and seeking to balance the essential operational functions (regulated energy) of a home with renewable energy sources.

Policy NZ1 – Monmouthshire Net Zero Carbon Homes

All new build residential development will be required to demonstrate compliance with the standards outlined below through the submission of an appropriately detailed, RICS-aligned operational energy assessment with any planning application resulting in the creation of 1 or more dwellings.

Development proposals for new homes must demonstrate the following:

- Space heating demand less than 25 kWh/m²/yr;
- On-site renewable energy generation to deliver the greater of:
  - matching the annual regulated electricity demand of the development; or
  - generating at least 40 kWh/m²fp/yr.
- EPC A or equivalent in accordance with the current version of the National Calculation Methodology for assessing the energy performance of dwellings;
- New homes must not connect to the gas grid and all heating and hot water needs should be met by low carbon heating systems. No fossil fuel systems are to be used on-site;

- ULEV charging infrastructure must be provided to every dwelling.

All developments must submit an as built performance survey following construction and prior to occupation of the home/s to demonstrate that they have been built to the applicable standards and minimise the 'performance gap.'

9.2.2 In a Monmouthshire context 'Net Zero Carbon' is defined as being a home that seeks to balance its 'essential' operational running costs (regulated energy) from renewable energy sources whilst ensuring the building fabric is to the highest standard (performance rating A). These measures, in combination with the de-carbonisation of the national grid, will result in development that mitigates the causes of climate change, by minimising carbon and other greenhouse gas emissions associated with the development in accordance with PPW12. This standard is above the current Building Regulations and drives the energy efficiency of homes further towards full operational carbon balance.

9.2.3 The space heating demand is the amount of heat energy needed to heat a home or building over a year and is expressed in kWh/m2/year. It is a measure of the thermal efficiency of the building elements. Various design and specification decisions affect space heating demand including building form and orientation, insulation, air-tightness, windows and doors and the type of ventilation system. Reducing space heating demand to the target levels identified is necessary to achieve a net zero carbon (in operation) building and aligns with recommendations from the Climate Change Committee, Royal Institute of British Architects (RIBA), Low Energy Transformation Initiative (LETI) and the UK Green Building Council (UKGBC). It is also beneficial to residents and building users as it directly reduces energy costs.

9.2.4 Energy Performance Certificates (EPC) provide information on the energy efficiency of a building providing a range from A to G – with A being most efficient. The EPC focuses on two main areas, Efficiency Rating – relating to the running costs of the property and Environmental Impact Rating – relating to the carbon dioxide emissions from the property. We must build homes which are of the highest energy efficiency in accordance with the energy hierarchy in PPW12 (Figure 10). Building homes to this higher standard will reduce energy demand and use energy efficiently.

9.2.5 Energy consumption generated by heating, hot water and lighting (regulated energy) must be generated by renewables on the dwelling or via the overall development to ensure that the essential operational functions of a home are met by renewable energy sources only, resulting in a "Net Zero" balance for carbon emissions for these essential functions. In combination with the de-carbonisation of the national grid, this will progress Monmouthshire further in relation to reducing carbon emissions and addressing climate change.

9.2.6 New buildings must not use fossil fuels for heating, hot water and cooking if Monmouthshire, Wales and the UK, are to stay within carbon budgets. Alternatives forms of renewable energy are available and should be used in the essential operation of the home. For example, heat pumps powered by renewable energy sources can provide both space heating (and cooling) and hot water and can serve individual homes or communal heating systems. Solar thermal panels, which turn solar energy into heat can also help with space, water heating and generate energy for lighting.

9.3 Flood Risk and Sustainable Drainage Systems

9.3.1 A key effect of climate change is the risk of flooding, both in terms of the likelihood of flooding as well as the intensity of flooding. In accordance with national guidance, S4 seeks to steer highly vulnerable development away from flood risk areas, to assess the implications of development in areas of flood risk and to ensure that new development does not increase the risk of flooding elsewhere. PPW12 and TAN 15: Development and Flood Risk, (July 2004) set out detailed national policy on development and flood risk and the Development Advice Maps set out flood zones to which different policy actions apply. An updated version of TAN 15: Development, Flooding and Coastal Erosion was published in September 2021 for consultation with the intention of it coming into effect in December 2021.

9.3.2 However, in November 2021, the Minister for Climate Change issued a letter to explain that the new TAN 15 was paused until June 2023 before coming into effect. This was supplemented by a further letter in December 2021 explaining that the existing policy framework of PPW12, TAN 15 (July 2004) and the Development Advice Map will remain in place during the pause period and the package of work to be completed by local authorities during that time. The letter states that in relation to development plan reviews, the flood risk considerations that feed into settlement strategy and site allocations must be in accordance with the new TAN 15 and the Flood Map for Planning. A second consultation draft of TAN 15 was published in January 2023 seeking views on further revisions. Site allocations have therefore been made with regard to the Flood Map for Planning and the January 2023 draft TAN 15 policy framework. In assessing flood risk and development, development proposals will be required to satisfy national policy on flooding set out in PPW12 and TAN 15 (applicable version at the time).

9.3.3 In addition to national flood risk guidance, regard should also be given to the Local Flood Risk Management Strategy, which is prepared by the Council as the Lead Local Flood Authority. The Strategy is a plan to manage flood and coastal erosion specifically in the Monmouthshire Area and contains information on local flood risk and local land drainage knowledge that may not be covered by the national Flood Maps for Planning. In this respect, early engagement with MCC as the Lead Local Flood Authority is strongly advised.

9.3.4 In accordance with national guidance, we have commissioned a Strategic Flood Consequence Assessment (SFCA) along with nine other Local Planning Authorities in the South-East Wales region to inform the preparation of the RLDP. The SFCA, TAN 15 (existing and draft) and Flood Map for Planning has been used to help inform the spatial strategy and the identification of areas most suitable for development, with allocations made outside of flood risk areas.

9.3.5 Monmouthshire County Council is also the Sustainable Drainage Approving Body (SAB) for the County. The Council is committed to implementing sustainable approaches to surface water drainage and expects development to incorporate Sustainable Drainage Systems (SuDS) wherever possible. Further details of requirements are set out in Policy CC1.

Policy CC1 – Sustainable Drainage Systems

Development proposals will be expected to incorporate water management measures, including Sustainable Drainage Systems (SuDS), to reduce surface water run-off and minimise its contribution to flood risk elsewhere.

The distribution of SuDS features across the site should be prioritised, reducing the size of any single SuDS feature.

9.3.6 The use of sustainable drainage systems (SuDS) must be an integral part of a development to ensure consideration is given to surface water drainage discharges, water quality, amenity and biodiversity enhancements. A separate regulatory framework, established through Schedule 3 of the Flood and Water Management Act 2010 (FWMA) is now in place to ensure this happens and establishes Monmouthshire County Council as a SuDS Approving Body (SAB), having statutory responsibility for approving and in some cases adopting and maintaining the approved drainage systems.

9.3.7 Under Schedule 3 of the Flood and Water Management Act 2010 (FWMA) the SuDS Approving Body is required to ensure that drainage proposals for all new development over 100 m^2 of construction area, where there are drainage implications as defined by the legislation, are fit for purpose, designed and built in accordance with the National Standards for Sustainable Drainage set out in Welsh Government's Statutory Standards for Sustainable Drainage: SuDS in Wales – Designing, Constructing and Maintaining Water Drainage Systems (2018).

9.3.8 However, regardless of size, there will still be an expectation that sustainable drainage methods are incorporated into a scheme where practicable. Policy CC1 therefore, seeks to ensure that development below the SAB size threshold noted above also implement the effective management of surface water drainage through SuDS features.

9.3.9 TAN 15 notes that SuDS manage rainfall in a similar way to natural processes, making use of the landscape and vegetation to control the flow and volume of surface water. They offer a variety of engineering solutions that can be employed to manage surface water run-off, recognising there are differences in soil structure, water table levels and infiltration rates across Wales. The Statutory Standards for Sustainable Drainage establish a hierarchical approach to drainage with priority given to surface water runoff collected for use, then infiltrated to ground followed by discharged to a surface water body. Drainage to a surface water sewer or combined sewer should only be used in exceptional circumstances and only once natural options have been excluded for valid reasons. SuDS can include green roofs, rainwater harvesting systems, soakaways/infiltration systems, permeable surfaces, detention basins and swales.

9.3.10 As the SuDS process is independent of the planning process, developers are strongly advised to consider planning and SuDS requirements in combination and as early in the design process as possible, as the implementation of SuDs across the site will influence the layout and masterplan. In this regard, early engagement with the SAB should be prioritised. SuDs features on sites over 100m^2 will be enforced through SAB Legislation. For proposals smaller than 100m^2, planning conditions and obligations will be used to ensure SuDS implementation. In order to provide effective drainage in the long term, developers will need to make arrangements for the future maintenance of SuDS and water courses associated with the development.

9.4 Renewable and Low Carbon Energy Generation

9.4.1 It is widely recognised that the planning system plays a key role in reducing carbon emissions and facilitating the infrastructure to generate renewable and low carbon sources of energy. Both Future Wales and PPW12 set out the requirements for clean growth and the decarbonisation of energy, including national and local policy aspirations:

- Environment (Wales) Act (2016) – requirement to achieve an 100% reduction in carbon emissions by 2050 (Updated March 2021).
- In March 2021, Welsh Government announced a commitment to achieve a **Net Zero Wales by 2050** following a recommendation report by the Climate Change Committee (CCC).
- Welsh Government targets specifically related to **local energy generation and ownership**:
    - Wales to generate electricity to 70% of its consumption from renewable sources by 2030;
    - 1 GW of renewable electricity and heat capacity in Wales to be locally owned by 2030, increasing to 1.5GW by 2035; and
    - New energy projects to have at least an element of local ownership.

9.4.2 To ensure this role is fulfilled, PPW12 places a requirement on planning authorities to develop an evidence base to inform the development of renewable and low carbon energy policies. The Welsh Government's Practice Guidance: Planning for Renewable and Low Carbon Energy – A Toolkit for Planners (Sept 2015) is advocated within PPW12 as an acceptable methodology for developing an evidence base to inform spatially based renewable energy policies and allocations for inclusion within the RLDP. The Carbon Trust has worked with the Council to undertake a Renewable and Low Carbon Energy Assessment (RLCEA) in line with the Toolkit requirements. Full details of the evidence base are set out in the Renewable Energy Background Paper.

9.4.3 The Council is in the process of preparing a Local Area Energy Plan (LAEP) which considers the whole energy system in the County and the potential ways to move towards a net zero carbon energy system. This is broader than the work covered within in the RLCEA which addresses specific land use requirements set out in PPW12 for inclusion in the RLDP. However, the two are linked and work is ongoing to ensure the two align where appropriate.

9.5 Local Search Areas

9.5.1 The RLCEA undertook a high-level constraints assessment of the County to identify areas that could be considered as potential Local Search Areas for wind or ground mounted solar PV development. It concluded that there is limited potential for wind development and that solar power had the greatest potential for contributing to renewable energy provision in the County. However, this resource reduces significantly when Best and Most Versatile Agricultural Land is excluded, with the remaining 'less constrained' areas being sparse, distinct land parcels distributed throughout the County rather than broad areas. Therefore, given the prevalence of high-quality agricultural land in the County, the RLDP does not allocate Local Search Areas for either wind or solar resources. Proposals for renewable energy generation schemes of less than 10MW will be considered on a case-by-case basis having regard to national planning policy and the requirements of criteria-based policy CC4 and other relevant policies of the Plan.

9.6 Renewable Energy Allocation

9.6.1 As part of the Council's ongoing decarbonisation aspirations, Land at Raglan Enterprise Park has been identified as having potential for a ground mounted solar development. This provides an opportunity to contribute to local and national renewable energy targets as well as potentially providing a direct-access energy source to adjoining existing and proposed employment uses. The proposal would be subject to satisfying detailed planning considerations including CC3 – Renewable Energy Generation.

Policy CC2 – Renewable Energy Allocation

Approximately 16 ha of Land at Raglan Enterprise Park, Raglan is identified as having potential for a ground mounted solar development, subject to detailed planning considerations. Opportunities for direct-access use should be fully explored and utilised as part of the proposal.

9.7 Renewable and Low Carbon Energy Generation

Policy CC3 – Renewable Energy Generation

Renewable and low carbon development proposals, inclusive of associated infrastructure, which contribute to meeting national and local renewable and low carbon energy efficiency targets will be permitted where:

a) A sequential approach to site selection has been followed to demonstrate that any reasonable alternatives have been considered;

b) Off-grid connection opportunities have been fully explored in addition to grid connection;

c) There are no unacceptable cumulative impacts in combination with existing or consented development;

d) There are no unacceptable adverse impacts upon the landscape, townscape and historic features and there is compliance with Policy LC1, with regard to protection and enhancement of landscape character;

e) There are no unacceptable adverse impacts on biodiversity;

f) There are no unacceptable adverse impacts on the amenities of nearby residents by way of noise, dust, odour or increases in traffic including construction and decommissioning stages;

g) When the technology is no longer operational there is a requirement to decommission, remove the facility and complete a restoration of the site through an agreed restoration strategy;

h) The wider environmental, economic, social and community benefits directly related to the scheme outweigh any potentially adverse impacts; and

i) The distinct identity of Monmouthshire will not be compromised.

9.7.1 Proposals for large scale energy development are classed as Development of National Significance and are determined by Welsh Ministers. Large scale energy developments include:

- All on-shore wind generation over 10 megawatts; and
- Other renewable energy generation sites with generating power between 10 megawatts and 350 megawatts.

9.7.2 Future Wales' spatial priority is for large scale wind energy developments to be directed towards Pre-Assessed Areas for Wind Energy (as shown on associated Map within Future Wales). There are no Pre-Assessed Areas for Wind Energy identified within Monmouthshire.

9.7.3 Proposals below the threshold for Development of National Significance are determined by local planning authorities. PPW12 and other national guidance documents[32] set out national policy on site selection considerations including impact on Best and Most Versatile Land and biodiversity and ecological networks. In addition to PPW12, Policy CC3 sets out the criteria by which proposals for renewable and low carbon energy schemes of 10MW or less will be assessed, seeking to balance the protection of the County's unique natural and built assets and the amenities of residents and visitors with the need to reduce carbon emissions and encourage zero carbon technologies. The impact of associated infrastructure will also be assessed as part of the proposal and should be minimised with preference given to locating schemes close to the grid connection or direct use options.

9.8 Renewable Energy Targets

9.8.1 The Renewable and Low Carbon Energy Assessment (RLCEA) also considers the contribution that Monmouthshire County Council is potentially able to make towards the national energy targets mentioned in paragraph 8.4.1 above. A range of potential renewable energy sources were considered as part of the RLCEA. However, due to factors such as a relatively small resource, infrastructure restrictions or long-term contracts in place for dealing with waste, the RLDP only sets targets for ground mounted solar, onshore wind, rooftop solar PV and heat pumps. Renewable energy sources that do not have targets are encouraged and open to consideration as part of the planning application process and will be noted as part of the monitoring process.

9.8.2 Table 3 sets out the targets for ground mounted solar and onshore wind. These are resource-based targets consistent with national planning policy. A low and more ambitious target has been prepared reflecting competing land uses and other constraints such as landscape impact, grid capacity and high-quality agricultural land.

9.8.3 Table 3 also sets out targets relating to roof mounted solar generation and installation of heat pumps. These targets align with the RLDP growth levels and the Council's commitment to deliver net zero homes in relation to new allocations.

[32] Planning implications of renewable and low carbon energy development and the Minister for Climate Change Letter – BMV and solar PV arrays March 2022

Table 3 – Renewable Energy Targets

Resource Based Target									
Energy Technology	Estimated Maximum Theoretical Resource		Current Installed Capacity		Low Target (inclusive of current installed capacity)		High Target (inclusive of current installed capacity)		Comments
Power									
	MW	MWh p.a	MW	MWh p.a.	MW	MWh p.a.	MW	MWh p.a	
Onshore Wind	32	76,000	0.3	700	3	7,000	6	14,000	2 – 4 small turbines
Ground Mounted Solar (excl. BMV land)	1,887	1,653,000	35	31,000	94	82,000	189	165,564	Equivalent to 165 or 331 ha
Target Aligned with RLDP Growth Strategy									
					Low Target (new allocations only)		High Target (new allocations only)		
					MW	MWh p.a.	MW	MWh p.a.	
Roof Mounted Solar PV (realigned with the RLDP growth rates)	Targets relate to new development only, linked to the RLDP growth strategy.				10	9,000	15	13,000	Approximately 2,500 – 3,000 homes and suitable employment
Total Power				**43,7000**	**107**	**98,000**	**210**	**178,564**	
Heat									
Heat Pumps (realigned with the RLDP growth rates)	Targets relate to new development only, linked to the RLDP growth strategy.				30	53,000	40	70,000	Approximately 2,500 – 3,000 homes and suitable employment
Total Heat				**6,000**	**30**	**53,000**	**40**	**70,000**	
Total Heat and Power				**49,7000**	**137**	**151,000**	**250**	**248,564**	

S4 - Links to Wider Framework	
RLDP Objectives	Objective 4 – Flood risk Objective 6 – Land Objective 7 – Natural resources Objective 15 – Accessibility Objective 17 – Climate change
Future Wales: The National Plan 2040 (WG, February 2021)	Policy 8 – Flooding Policy 12 – Regional Connectivity Policy 16 – Heat Networks Policy 17 – Renewable and Low Carbon Energy and Associated Infrastructure Policy 18 – Renewable and Low Carbon Energy Developments of National Significance
Planning Policy Wales Edition 12 (WG, February 2024)	Productive and Enterprising Places Theme (Chapter 5) Distinctive and Natural Places Theme (Chapter 6)
Well-being of Future Generations Act (WBFGA) (WG, 2015)	A resilient Wales A healthier Wales A globally responsible Wales
Gwent PSB Well-being Plan (August 2023))	• Provide and enable the supply of good quality, affordable, appropriate homes. • Take action to reduce our carbon emissions, help Gwent adapt to climate change, and protect and restore our natural environment.
Taking Monmouthshire Forward - Community and Corporate Plan 2022 - 2028 (April 2023)	This policy supports the Community and Corporate Plan objectives of ensuring Monmouthshire is a: • Green place to live and work, with reduced carbon emissions, and making a positive contribution to addressing the climate and nature emergency; • Thriving and ambitious place where there are vibrant town centres, where businesses can grow and develop. • Safe place to live where people have a home and community where they feel secure.
Key Evidence	TAN 12: Design (March 2016) TAN 15: Development and Flood Risk (2004)

	Development Advice Maps (TAN 15) Practice Guidance – Planning for Sustainable Buildings (WG, 2014). Renewable and Low Carbon Energy Assessment for Monmouthshire County Council – October 2020 Renewable Energy Background Paper – October 2024 Strategic Flood Consequence Assessment – Stage 1 – November 2022

10. Green Infrastructure, Landscape and Nature Recovery

10.1.1 Monmouthshire has significant and distinctive green infrastructure (GI), landscape, biodiversity and nature resources, a number of which are of international and national importance, as well as numerous locally designated sites. The need to protect, enhance and manage these resources are key objectives of the RLDP, Future Generations and Well-being Act, Monmouthshire's Community and Corporate Plan as well as Monmouthshire's Climate and Nature Emergency Strategy.

10.1.2 There is clear national policy guidance and legislation with regard to maintaining and enhancing GI, landscape character and nature recovery. Future Wales 2040 Policy 9- 'Resilient Ecological Networks and Green Infrastructure' and Chapter 6 of PPW12 both respond to Section 6 Duty of the Environment (Wales) Act 2016.

Net Benefit for Biodiversity

10.1.3 The Environment (Wales) Act 2016 introduced an enhanced Biodiversity and Resilience of Ecosystems Duty (Section 6 Duty) on public authorities in Wales. This places a duty on the Council to seek to maintain and enhance biodiversity by ensuring development does not cause any significant loss of habitats or populations of species and must provide a net benefit for biodiversity and improved ecosystem resilience.

10.1.4 PPW12 notes that the broad framework for implementing the net benefit for biodiversity and building resilience through the planning system will include addressing five key themes of ecosystem resilience: Diversity, Extent, Condition, Connectivity and Adaptability to Change (DECCA).

Section 7 Habitats and Species

10.1.5 Section 7 of the Environment (Wales) Act 2016 requires Welsh Ministers to publish and maintain a list of habitats and species that are regarded as 'principal importance' for the purpose of building ecosystem resilience and maintaining and enhancing biodiversity in relation to Wales. These lists are referred to as S7 habitats and species and are afforded additional protection under this legislation.

Green Infrastructure Assessments

10.1.6 Section 6 Duty and PPW12 also set out that development proposals must adopt a proactive placemaking approach to delivering multi-functional green infrastructure and ecosystem resilience, and this is required to be demonstrated through Green Infrastructure Assessments. GI assessments should undertake an evidence base step wise approach addressing the DECCA themes to inform the design and implementation of projects. Guidance on GI assessments and the step wise approach can be found in PPW12, as well as NRW Area Statements and MCC has also undertaken a GI strategy and Local Nature Recovery Action Plan, which should be part of the evidence base to inform GI assessments.

Area Statements

10.1.7 The Environment Act (Wales) 2016 introduced a requirement to produce an Area Statement for South East Wales, which NRW published in March 2020. The overarching focus for the Area Statement is to review the way in which natural resources are managed and used, support ecosystem services and build resilience through four themes; Linking Landscape, Climate Ready Gwent, Healthy Active Connected and, Ways of Working. The RLDP will have regard to the Area Statement.

Wales, Regional and Local Nature Recovery Action Plans

10.1.8 The Wales Nature Recovery Action Plan (NRAP) is a broad guide to deliver Welsh Government outcomes to benefit nature recovery on a national scale. At a regional scale The Resilient Greater Gwent project delivered in the Greater Gwent Nature Recovery Action Plan (GGNRAP) provides a framework to drive change at the regional scale and to support organisations to work together. Monmouthshire's Local NRAP will translate these objectives to local scale and aims to provide achievable actions to help reverse the decline in biodiversity and build ecosystem resilience in Monmouthshire.

10.1.9 Policy S5 seeks to ensure that development proposals adopt this proactive placemaking approach set out in national policy, Area Statements and NRAPS and that all those participating in the planning process follow evidence based Green Infrastructure Assessments and the step wise approach outlined in PPW12 and The Environment (Wales) Act 2016 in order to deliver GI and landscape benefits and assist in nature recovery and ecosystem resilience.

Strategic Policy S5 – Green Infrastructure, Landscape and Nature Recovery

Development proposals will adopt a strategic and proactive placemaking approach. An evidence based Green Infrastructure Assessment and step wise approach will inform design and long-term delivery of a multifunctional landscape; capable of delivering a wide range of social, economic, environmental, health and well-being benefits for local communities and the County as a whole, including climate change action, net benefit for biodiversity and ecosystem resilience.

Development proposals must:

Maintain, protect and enhance the integrity and connectivity of Monmouthshire's green infrastructure, landscape, biodiversity, access and heritage assets through the following key functions:

i) Greenspace provision, connectivity and enjoyment by ensuring the creation of accessible multifunctional interconnected spaces and routes that offer opportunities for recreation and health and well-being;

ii) Landscape setting and quality of place, by identifying, assessing, protecting and enhancing the natural and distinctive landscape, historical, cultural, ecological and geological heritage, including natural and man-made elements associated with existing landscape character;

iii) Biodiversity and resilient ecosystems by protecting, assessing, positively managing and enhancing biodiversity and geological interests, including designated and non-designated sites, protected and priority species and their habitats, and the ecological connectivity between them;

iv) Sustainable energy use;

v) Local food production; and

vi) Flood attenuation and water resource management.

10.2 Green Infrastructure

10.2.1 Green infrastructure (GI) is defined as "the network of natural and semi-natural features, green spaces, rivers and lakes that intersperse and connect places". GI is inclusive of natural or man-made wetland, freshwater and coastal elements that are often referred to as Blue Infrastructure. At a landscape scale GI can include ecosystems such as uplands, valleys, wetlands, river corridors, canals and coastlines. At a local and smaller scales, it could include fields, woodlands, hedges, ponds, natural green spaces, parks, gardens, designed sustainable drainage systems, street trees, verges, PROW and other environmental features within urban and rural settings which provide benefits for the economy, local people and nature recovery.

10.2.2 GI plays a fundamental role in sustainable energy use through efficient building and site design and construction. Concepts such as green roofs and planting of particular species to facilitate appropriate shading and cooling reinforce the role GI can play in reducing carbon emissions and providing opportunities for climate change adaptation such as flood attenuation and water resources management. The Council's Climate and Nature Emergency Strategy and Supporting Action Plans also recognise GI as a mechanism for addressing climate change action and mitigation and is also addressed in Strategic Policy S4 – Climate Change.

10.2.3 GI can enhance Monmouthshire's strong rural and agricultural economy. Support for local food production and rural diversification opportunities could include the design and management of food production, space for community food growing, allotment provision, planting in public realm spaces and providing for pollinating insects.

10.2.4 In accordance with Strategic Policy S5, Policy GI1 seeks to ensure that development proposals maintain, protect and enhance the integrity and connectivity of Monmouthshire's multifunctional GI.

Policy GI1 – Green Infrastructure

Development proposals will be expected to maintain, protect and enhance the integrity and connectivity of Monmouthshire's diverse GI network by:

a) Undertaking an appropriate GI asset and opportunities assessment and step wise approach based on the scale and complexity of development to inform development proposals. All major development proposals will be required to submit a GI Assessment.

b) Ensuring that existing GI assets are protected, retained and integrated into new development. Where loss of GI is unavoidable, in order to secure sustainable development, appropriate mitigation and/or compensation of the lost assets will be required.

c) Incorporating new and /or enhanced GI of an appropriate type, standard and size. Where on-site provision of GI is not possible, contributions will be sought to make appropriate provision for GI off-site.

A GI Statement must be provided with all planning applications. The statement will be proportionate to the scale, nature and complexity of the development proposed and will describe how GI has been incorporated into the proposal. The GI Statement will need to demonstrate how a step wise approach as outlined in chapter 6 of PPW12 has been applied.

10.2.5 In line with national policy all developments will be required to submit a GI assessment or GI statement, depending on the nature/scale of the development proposal.

10.2.6 All developments should be planned in a way to enhance and integrate existing GI assets within development proposals and ensure they maximise ecosystem services and resilience and consider connectivity to wider GI and complimentary networks. This should be considered through integration and enhancement of PROWs, cycle routes, green space and blue/green corridor connectivity and land management activity that supports enhancements to habitat and climate change adaptation.

10.2.7 Development proposals should be informed by the GI priorities and principles identified in GI assessments, MCC's GI Strategy and MCC's GI SPG. The GI SPG will provide further advice on GI implementation and methodology as well as the content and delivery of GI assessments and GI statements.

MCC GI Strategy

10.2.8 The Council's GI strategy provides an overarching framework for positive actions by all stakeholders involved in the future protection, management and enhancement of GI in Monmouthshire and provides a delivery mechanism for actions set out in the Climate and Nature Emergency Strategy and Community and Corporate Plan and sets out key objectives and priorities for guiding the planning management and delivery of GI in Monmouthshire. It also forms part of the baseline evidence to help inform the Strategic Regional Green Infrastructure for Gwent delivered through the Gwent Green Grid Partnership, as well as a positive and proactive approach to the management of Monmouthshire's GI assets in tandem with the RLDP's strategy.

Trees, Woodland and Hedgerows

10.2.9 Trees, woodland and hedgerows are an integral part of features which contribute to Monmouthshire's local GI assets. National policy set out in PPW12 and TAN 5 refers to how important trees and woodlands are to biodiversity and their significance in connecting habitats for resilient ecological networks.

10.2.10 Policy GI2 therefore will protect trees, hedgerows, groups of trees and areas of woodland where they have ecological value, contribute to the character or amenity of a particular locality or perform a beneficial GI function. Where appropriate, Tree Preservation Orders (TPOs) or planning conditions will be used to protect important trees and woodland groups.

Policy GI2 – Trees, Woodland and Hedgerows

Development proposals that would adversely impact on trees, woodland and hedgerows that are either a public amenity, of cultural heritage, provide important ecosystem services, are protected, or significantly contribute to GI connectivity will not be permitted.

Where trees, woodland and hedgerows are present, development will only be permitted where they are informed by appropriate surveys, assessment and plans to identify and inform biodiversity, GI and landscape value, methods for retention, integration, protective mitigation and long-term protection through maintenance and management.

If removal and/or damage is necessary, a scheme for replacement trees, woodland or hedgerows must be agreed as part of the development proposal design and will be subject to the minimum planning ratios as set out in National Policy.

10.2.11 Development proposals on sites containing, or that will impact on trees, woodland and hedgerows that may be affected by the development will be required to undertake a detailed assessment and mitigation in accordance with 'BS 5837:2012 Trees in relation to design, demolition and construction' and 'BS 8545:2014 Trees: from nursery to independence in the landscape' or any subsequent replacement to that guidance.

10.2.12 Trees, woodland and hedgerows contribute to biodiversity, landscape character and carbon capture. Permanent removal of trees, woodland and hedgerows will only be permitted where a step wise approach has been followed and significant and clearly defined public benefits shall be achieved through the development proposal. Where loss is unavoidable a developer will be

required to provide compensatory planting at a ratio equivalent to the quality, environmental and ecological importance of the trees and hedgerows lost, preferably on site allowing for unconstrained growth. PPW12 provides ratios for compensation and should be referred to accordingly.

10.2.13 This policy will also be supported by an SPG on Trees, Woodlands and Hedgerows which will be prepared to provide guidance on assessment and implementation. This will include details on canopy cover in Monmouthshire from NRW's tree canopy cover assessment.

10.3 Landscape Character

10.3.1 Monmouthshire benefits from major landscape resources and areas of visual quality and is home to internationally and nationally designated landscapes. These provide significant environmental, economic, cultural, and social benefits and help to create a sense of place. The County's key landscape attributes range from exposed upland moorlands in the northwest, to well-wooded central lowlands interspersed with good quality agricultural land, diverse river catchments, and the historically and ecologically unique coastal landscape to the south.

10.3.2 The RLDP will seek to protect, maintain and enhance Monmouthshire's landscape setting and quality of place as set out in Strategic Policy S5 and development management policies LC1, LC2, LC3, L4 and LC5. These development management policies specifically protect the internationally designated Blaenavon Industrial Landscape World Heritage Site (WHS), the Bannau Brycheiniog National Park (BBNP), which is also a Dark Skies Reserve, and the Wye Valley National Designated Landscape Area of Outstanding Nature Beauty (AONB). Other landscape features which contribute to Monmouthshire's distinctive character will also be afforded appropriate levels of protection and their significance highlighted using NRWs LANDMAP[33] process.

10.3.3 Policy LC1 seeks to ensure that proposals for development protect, conserve and enhance Monmouthshire's landscape character as defined by LANDMAP Landscape Character Assessments. Proposals that would adversely affect the landscape character will not be permitted.

Policy LC1 – Landscape Character

Development proposals that would impact upon landscape character, as defined by LANDMAP, must demonstrate through a landscape assessment how landscape character has influenced their design, scale, nature and site selection.

Development will be permitted provided it would not have an unacceptable adverse effect on the special character or quality of Monmouthshire's landscape in terms of its visual, historic, geological, ecological or cultural aspects by:

a) Causing significant visual intrusion;

[33] LANDMAP is a GIS based landscape resource developed by NRW where landscape characteristics, qualities and influences on the landscape are recorded and evaluated in a nationally consistent data set.

b) Causing significant adverse change in the character of the built or natural landscape;

c) Being insensitively and unsympathetically sited within the landscape;

d) Introducing or intensifying a use which is incompatible with its location;

e) Failing to harmonise with, or enhance the landform and landscape;

f) Losing or failing to incorporate important traditional features, patterns, structures and layout of settlements and landscapes of both the built and natural environment; and /or

g) Respecting dark skies.

Particular emphasis will be given to those landscapes identified through the LANDMAP Landscape Character Assessment as being of high and outstanding quality because of a certain landscape quality or combination of qualities.

10.4 Landscape Character Assessments

10.4.1 Development proposals should be informed by an appropriate Landscape Character Assessment which considers the effect of development, and cumulative impact where appropriate, on landscape, historic and urban features, character, qualities and capacity to absorb change. Examples may include Landscape and Visual Impact assessments (LVIA), Assessment of the Significance of the Impact of Development on Historic Landscape (ASIDOHL) and Town Visual Impact Assessment (TVIA).

10.4.2 LANDMAP data should be used as a basis for more detailed landscape assessments and this information along with other studies should provide part of the evidence base regarding landscape, to ensure that development proposals are informed by and reflect the distinctive character, qualities and sensitivities of the area. Other such studies include Monmouthshire's Landscape and Sensitivity Capacity Study.

10.4.3 An updated Landscape and Sensitivity Capacity Study to inform the RLDP has been undertaken. The update takes account of development that has occurred since the adoption of the current LDP and assesses key areas submitted at the Stage 1 Call for Candidate Sites. This work focuses on the Primary, Severnside and Secondary settlements and provides an opinion on the least sensitive areas in terms of landscape in these settlement areas for residential growth potential. The RLDP growth and spatial strategy has been informed by this Landscape Sensitivity Capacity update assessment.

10.5 Blaenavon Industrial Landscape World Heritage Site

10.5.1 This policy specifically seeks to protect the Blaenavon Industrial Landscape World Heritage Site (BILWHS) and its setting from inappropriate development in order to maintain its unique historic character and values (as set out in the BILWHS Management Plan).

Policy LC2 – Blaenavon Industrial Landscape World Heritage Site

Development within or, in the vicinity of, the Blaenavon Industrial Landscape World Heritage Site (BILWHS) will only be permitted where it would:

a) Preserve or enhance the landscape setting and character as defined through the LANDMAP process;

b) Have no serious adverse effect on significant views into and out of the World Heritage site;

c) Promote the standards of design in terms of distinctiveness, siting, mass, scale and materials that are sympathetic to, preserve or enhance the character of the local area.

Development that would cause unacceptable harm to the outstanding universal values and unique character as set out in the BILWHS Management Plan that justify the designation of the World Heritage Site, or its setting, will not be permitted.

10.5.2 In November 2002, an area of 33 sq km at Blaenavon was designated as a World Heritage Site due to its outstanding international importance. This area is one of the finest surviving examples of a landscape created by coal mining and iron making in the late eighteenth and nineteenth centuries. The town of Blaenavon lies within the designated area and its surrounding landscape includes a range of Scheduled Ancient Monuments, many Listed Buildings, Conservation Areas and Sites of Special Scientific Interest.

10.5.3 A small part of the site, 20 hectares, lies within the Monmouthshire Plan area to the southwest of Llanfoist. The designation creates an international obligation to protect and conserve the world heritage values of the site. Although no additional statutory controls are imposed through the designation, it does highlight the outstanding importance of the site as a material consideration to be taken into account in the determination of planning applications.

10.5.4 Development proposals within, or affecting the setting of, the World Heritage Site should have regard to LANDMAP and the BILWHS Management Plan. All proposals must seek to conserve and enhance the unique historic character and special qualities of the landscape.

10.6 National Parks and National Landscapes

10.6.1 PPW12 requires development plan policies to favour the conservation of the natural beauty of National Parks and National Landscapes (AONBs), although it is recognised that regard should be had to the economic and social well-being of such areas. National guidance also states that National Parks and National Landscapes (AONBs) are of equal status in terms of landscape and scenic beauty and that both must be afforded the highest status of protection from inappropriate developments.

10.7 Bannau Brycheiniog National Park

10.7.1 Policy LC3 seeks to protect the setting of the Bannau Brycheiniog National Park (BBNP) from inappropriate development in order to maintain its unique character and special landscape qualities.

10.7.2 Although there are 12,000 hectares of National Park within the County, its planning is controlled by the Bannau Brycheiniog National Park Authority. Notwithstanding this it is recognised that the BBNP provides an important backdrop to the Abergavenny area and wider landscape character of Monmouthshire protecting its setting from encroachment by inappropriate development.

10.7.3 The BBNP is also recognised as having an International Dark-Sky Association (IDA) designation. A dark sky is an area where the night sky is relatively free from artificial light and it therefore it is important to protect this dark sky reserve in areas in close proximity to the BBNP.

Policy LC3 – Bannau Brycheiniog National Park

Development in the vicinity of the Bannau Brycheiniog National Park will only be permitted where it would:

a) Preserve or enhance the landscape setting, as defined through the LANDMAP process;

b) Have no serious adverse effect on significant views into and out of the National Park.

c) Have no adverse impact on the International Dark Skies Reserve designation.

Development that would cause unacceptable harm to the qualities that justify the designation of the Bannau Brycheiniog National Park or its setting will not be permitted.

10.8 Wye Valley National Landscape (Area of Outstanding Natural Beauty)

10.8.1 Policy LC4 seeks to protect the Wye Valley National Landscape (AONB) from inappropriate development in order to maintain its unique character, special landscape qualities and local distinctiveness.

10.8.2 The Wye Valley National Landscape (AONB) provides a range of benefits for Monmouthshire residents and visitors in terms of its visual amenity, cultural heritage and important habitats. Proposals for development within, or affecting the setting of, the National Landscape (AONB) should have regard to the strategic objectives and policy proposals set out in the Wye Valley National Landscape (AONB) Management Plan and seek to conserve and enhance the unique character and special qualities of the landscape.

10.8.3 Management of the National Landscape (AONB) is co-ordinated through the Wye Valley National Landscape (AONB) Management Plan, 2021-2026. The Plan sets out the vision and strategic objectives for the area in helping to conserve and enhance the outstanding landscape of the Lower Wye Valley.

Policy LC4 – Wye Valley National Landscape (AONB)

Within the Wye Valley National Landscape (AONB), any development must be subservient to the primary purpose to conserve and enhance the natural beauty of the area. In considering development proposals regard will be given to:

a) The long term effect of the proposal, and the degree to which its nature and intensity is compatible with the character, purpose and overall management of the National Landscape (AONB);

b) The degree to which design, quality and use of appropriate materials harmonise with the surrounding landscape and built heritage;

c) The extent of the landscaping proposed;

d) The need to protect features in the landscape identified as important through LANDMAP;

e) The extent to which a proposed new building or use will generate additional traffic and the requirement for improvement of existing roads and lanes, including the surfacing of green lanes;

f) The impact of the proposed development upon nature conservation interests.

Development proposals that are outside the National Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted.

10.9 Dark Skies and Lighting

10.9.1 As a predominantly rural and relatively undeveloped area, Monmouthshire is sensitive to light pollution which can affect the tranquillity of the natural environment and can have a negative impact on landscape character and biodiversity. A large proportion of Monmouthshire's rural area has some of the darkest skies in Wales as evidenced in the NRW Tranquil Maps (2021) with the BBNP and Wye Valley National Landscape (AONB) falling within the two darkest night sky categories. As set out in Policy LC2, the BBNP is also recognised as having an International Dark-Sky Association (IDA) designation.

10.9.2 Nocturnal species such as bats have adapted to live in darkness to avoid competition and predation and will actively avoid lit areas. Sources of lighting which can have the potential to disturb biodiversity are not limited to street lighting or security lighting, but can also include, flood lighting, light spill via windows, and in some cases car headlights.

10.9.3 Proposals which might result in artificial lighting of habitat, important for bats or other biodiversity, will need to be accompanied by sufficient information to enable a full assessment of the proposal to be undertaken. The lighting strategy will need to retain key habitat features, with an appropriate buffer, in darkness with no illumination or glare. Appropriate mitigation measures will be sought to screen the glare and obtrusiveness of lighting from features identified as important for biodiversity and neighbouring countryside areas.

10.9.4 The built form can also be adversely affected by light pollution it is therefore important to protect the architectural and historic environment from insensitive lighting. Light spillage can

also impinge upon people's homes, infringing on privacy. Where lighting is located in or close to a residential property / area, the hours of illumination should be appropriately controlled.

10.9.5 Policy LC5 seeks to control the use of external lighting, light pollution and light spill from developments. While external lighting is essential for reasons of safety and security and is necessary for commercial use and some community and sports facilities, excessive and poorly designed lighting can cause light pollution and have cumulative and adverse effects on human health and well-being and biodiversity. In addition, lighting equipment itself can spoil daytime views.

10.9.6 Particular care will be given to lighting proposals in the open countryside, due to the need to protect the dark skies tranquillity, remoteness and landscape character of Monmouthshire's rural areas.

Policy LC5 – Dark Skies and Lighting

Development proposals involving external lighting must include appropriate lighting details and where proportionate a strategy to ensure:

a) Lighting is necessary for the development;
b) The proposed lighting and associated infrastructure is the minimum required;
c) Light spillage is minimised;
d) The prevention of glare and respect for the amenity of neighbouring land uses;
e) The visual and landscape character of the built and natural environment is not unacceptably affected;
f) In open countryside locations dark skies are retained;
g) Potential adverse impacts on biodiversity and ecological connectivity are minimised; and
h) Cumulative and in-combination lighting impacts are avoided.

10.10 Nature Recovery and Geodiversity

10.10.1 Monmouthshire is rich and diverse in nature resources, which is reflected in the range of international, national and local designations within the county, which include:

- International [statutory]: Special Protection Area (SPA), Special Areas for Conservation (SACs), Ramsar Sites
- National[statutory]: Sites of Special Scientific Interest (SSSIs), National Nature Reserves (NNRs)
- Local [non-statutory]: Local Nature Reserves (LNR), Local Wildlife Sites (LWS), Sites of Importance for Nature Conservation (SINCs) and Regionally Important Geodiversity Sites (RIGS)

International/National (Statutory) Sites and Protected Sites and Species

10.10.2 Proposals in statutory designated sites including SPA, SACs, SSSIs, NNRs or sites containing habitats that are irreplaceable as defined by PPW12, are as a matter of principle, unacceptable.

10.10.3 PPW12 and TAN 5 set out national planning policy for international and nationally designated sites and protected species. NRW should be consulted on proposals that may affect international / national sites and any protected species.

10.10.4 Consideration must also be given to the Conservation of Habitats and Species Regulations 2017 (as amended) in the context of both species protection and the potential impacts on sites in the National Site Network during the development management process. The Conservation of Habitats and Species Regulations 2017 also requires that development proposals likely to have a Significant Effect on a SPA or SAC are subject to an Appropriate Assessment.

10.10.5 Any development proposal that could have a significant effect on the integrity of a SAC, SPA or Ramsar site will not be in accordance with the development plan. This also applies to Functionally Linked Land, which is defined as habitat outside the designated site boundary that is fundamental to the ability of the designations to reach their Conservation Objectives. The parameters for this being specific to each designated site.

10.10.6 In line with the Habitats Regulations and in consultation with NRW, it will be necessary for project level assessments to be undertaken where there is a potential for significant effects on sites in the National Site Network.

10.10.7 In accordance with best available monitoring and evidence, guidance on specific SAC issues e.g. nutrients in SAC rivers which is relevant to development management procedures, is published by Welsh Government, NRW and where appropriate, Monmouthshire County Council.

10.10.8 A Habitats Regulations Assessment (HRA) in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended) has been undertaken alongside RLDP to consider development plan level hazards, likely significant effects, and potential adverse impacts on protected sites in the National Site Network. Policy NR3 Severn Estuary European Marine Site has been developed in response to the recommendations of this assessment.

Locally Designated (Non-Statutory) Sites, Undesignated Sites and Protected Species

10.10.9 Development proposals affecting locally designated non-statutory sites, or undesignated sites that satisfy the relevant designation criteria, or Section 7 Habitats or Species, or Local Nature Recovery Action Plan habitats/species of importance, will be assessed against Policy NR1.

10.10.10 Non-statutory sites can form the core of a vital network of threatened habitats, play an essential role in protecting, maintaining, connecting, and restoring biodiversity and contribute to nature recovery and a net benefit for biodiversity. Guidance on Protection for Non-statutory Designations is included in PPW12. In accordance with Strategic Policy S5, Policy NR1 seeks to protect, positively manage and enhance Monmouthshire's biodiversity, ecosystems resilience and geological importance. It seeks to ensure that development proposals have regard to their impact on nature recovery and that provision for net benefit for biodiversity & ecosystem resilience is creatively incorporated into the design of development including siting, scale,

density, and other key considerations, such as reducing the spread and impact of invasive non-native species (INNS), to promote local priorities.

10.10.11 Guidance on maintaining and enhancing biodiversity is set out in PPW12 including the step wise approach to avoiding harm and delivery of net benefit for biodiversity. The approach includes avoiding damage, minimising damage, mitigating damage and restoring, providing compensation on-site, providing compensation off-site and the option for refusing applications where development is not appropriate.

Policy NR1 – Nature Recovery and Geodiversity

Where biodiversity or ecosystem resilience could be impacted by a development proposal, applications must be accompanied by an ecological survey and assessment of the likely impact of the proposal on locally designated site(s) and functionally linked land, species or habitat(s) and shall make appropriate provision for their safeguarding and delivery of net benefit for biodiversity.

Development proposals in sites containing protected species or habitats which are defined as irreplaceable by PPW12 are unacceptable.

Development proposals that are likely to damage a locally designated site of biodiversity and / or geological importance, or a site that satisfies the relevant designation criteria, or the continued viability of priority habitats and species, or Section 7 list of species and habitats, will only be permitted where:

a) The need for the development clearly outweighs the biodiversity, ecosystem resilience or geological importance of the site; and

b) It can be demonstrated that the development cannot reasonably be located elsewhere.

Where development addresses criteria a) and b), 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 on-site and where not possible, off-site. Where appropriate, long-term management and maintenance of biodiversity must be secured.

Development proposals must deliver net benefit for biodiversity and ecosystem resilience and will be expected to:

i) Maintain, incorporate, and enhance existing semi-natural habitats, linear habitat features, the ecological connectivity between them, other features of nature conservation interest and geological features. These must be safeguarded during construction work.

ii) Incorporate locally appropriate, climate resilient, native, and local provenance 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 biodiversity and landscape resources through appropriate building design, site layouts, retention of dark corridors, landscaping techniques and choice of plant species.

iv) Where appropriate, make provision for on-going maintenance of retained or created nature conservation interests.

10.10.12 Proposals which may have an adverse effect on locally designated sites, protected or priority species and habitats, must be accompanied by sufficient information to enable a full assessment of the proposal to be undertaken. The need for such assessments will not be limited to development located within the designated areas, as significant effects may occur even if the proposed development is located some distance from the conservation interest.

10.10.13 A site subject to pre-emptive clearance, will be considered during the planning process as it was before clearance took place. In the absence of evidence to the contrary, it shall be presumed to have been in good ecological condition and the delivery of net benefit for biodiversity must be achieved from that presumed status.

10.10.14 Where development is permitted, appropriate planning conditions or obligations may be required to ensure suitable protection, monitoring, mitigation or compensation and favourable management.

10.10.15 Where the adverse effect on biodiversity and ecosystem resilience clearly outweighs other material considerations, the development should be refused.

10.10.16 This policy will be supported by SPG which will provide further information on the delivery of net benefit for biodiversity in Monmouthshire. The Monmouthshire Local Nature Recovery Action Plan (NRAP) shall be referred to accordingly to identify priorities for maintaining and enhancing biodiversity & ecosystem resilience in the County.

10.11 Gwent Levels and Severn Estuary (European Marine Site)

10.11.1 The Gwent Levels and Severn Estuary European Marine Site (EMS) are identified as a contiguous series of SSSI, SPA, Ramsar site, SAC and a Special Landscape of Historic Interest of Monmouthshire's coastal area. A number of locally designated SINCs have also been identified in the area for their valuable priority habitats. The Welsh National Marine Plan (WNMP) and Severn Estuary Shoreline Management Plan[34] identify key areas of priority for the management of the coastal area . National Policy should be referred to accordingly in relation to proposals that may affect coastal areas.

10.11.2 Future Wales 2040 identifies the Gwent Levels as one of nine National Natural Resource Areas and is integral in seeking to deliver the elements of the Nature Recovery Action Plan for Wales in response to climate change and national nature emergencies. The Gwent Levels Management Plan 2022 provides a vision and set of aims for its ongoing and future management. These are supported by a Gwent Levels Landscape Character Assessment and Gwent Levels GI Strategy.

10.12 Severn Estuary European Marine Site (EMS)

[34] Developed in partnership by local authorities, regulators and other stakeholders is a high level non-statutory policy document designed to assist coastal flood and erosion risk management planning.

10.12.1 Policy NR2 seeks to protect the Severn Estuary European Marine Site (EMS) within Monmouthshire, which is a recommendation from the RLDP's HRA. Evidence from the HRA has demonstrated that the EMS is subjected to regular disturbance by user groups, especially dog walkers, which generally have the biggest disturbance effect on features of the protected site.

10.12.2 Residential development, tourism development, sustainable transport infrastructure and development with the potential to impact Functionally Linked Land, could contribute to recreational pressure on the Severn Estuary features. Any development proposals that would increase visitor access to sensitive habitat features in the Severn Estuary SAC, SPA and Ramsar site, especially on to saltmarsh and mudflat habitat, will not be supported unless no adverse effect on the integrity of the sites can be confirmed.

10.12.3 A Core Recreational Catchment zone of 12.6km has been identified by the HRA to inform the RLDP. This indicates where new development might be required to make financial contribution to fund on-site SAC/SPA conservation measures, as part of strategic mitigation measures. This takes the form of a recreation mitigation and management strategy and would include a mixture of suitable alternative natural greenspace and strategic access management and monitoring measures.

10.12.4 Suitable alternative natural greenspace must be a key design consideration in the developments within 12.6km of the Severn Estuary with housing site allocation policies referring to provision. Supplementary Planning Guidance will provide further information on the mechanisms for delivery.

10.12.5 The Severn Estuary EMS Regulation 33 Guidance prepared by Natural England and Countryside Council for Wales (2009) remains the relevant guidance when considering effects on the integrity of the EMS.

Policy NR2 – Severn Estuary Recreational Pressure

Development proposals that would result in an increase in visitor pressure on features of the Severn Estuary SAC, SPA, Ramsar site, or Functionally Linked Land will not be supported unless it can be demonstrated that no adverse impact on the integrity of the European Marine Site will occur.

10.13 Protection of Water Sources and Water Environment

10.13.1 This policy aims to maintain and enhance the quality and quantity of water resources, including aquifers, rivers, canals, lakes, ponds, wetlands, ground waters, surface waters and other water features, which are important for a wide range of uses and for their intrinsic ecological and amenity value. Full regard must be had to the Water Framework Directive (WFD)[35] which sets

[35] Water Framework Directive (WFD)2000/60/EC has been the main law for water protection in Europe. It applies to inland transitional and coastal surface waters as well as groundwaters. It ensures an integrated approach to water management, respecting the integrity of whole ecosystems, including by regulating individual pollutants and setting corresponding regulatory standards.

out the requirements in relation to the water environment and requires good water quality status for all water bodies.

10.13.2 The Council, NRW and Dŵr Cymru Welsh Water all have a role to play in the protection and enhancement of the water environment. The Council will work collaboratively with NRW, DCWW and other appropriate organisations with regard to any proposal that is likely to affect water sources or quality.

10.13.3 Deteriorating water quality and quantity can affect the supply of water for domestic, industrial and agricultural based uses, water based recreation, fisheries, nature conservation and general amenity. Some new developments including housing or agricultural enterprises can lead to increased amounts of nutrients entering the river environment from additional wastewater or land management. Nutrient enrichment, also known as eutrophication, can alter the balance of plant species in our rivers causing significant ecological damage. Consequently, development will only be permitted where the Council, in consultation with NRW and other appropriate bodies is satisfied that suitable measures have been undertaken to protect water resources and will generally encourage initiatives that result in an improvement in those resources. Conversely, development that poses an unacceptable risk to water resources (including ground water and surface water) or features dependent on those resources will not be permitted.

Wastewater Infrastructure

10.13.4 Water quality can be improved through effective wastewater infrastructure provision. Dŵr Cymru Welsh Water (DCWW) is the sewerage undertaker for the County and has a general duty to provide the sewerage system. On this basis DCWW is currently committed to undertake improvements in Wastewater Treatment Works (WwTW) capacities, treatment levels and discharge quality through actions programmed secured through their Asset Management Programme (AMP) process.

Phosphate Water Quality in Riverine Special Areas of Conservation (SAC)

10.13.5 Following evidence of the environmental impacts of eutrophication and in particular the nutrient phosphates in Monmouthshire's rivers, namely the River Usk and River Wye, NRW has issued detailed planning guidance to ensure that the water quality of our rivers does not deteriorate any more.

10.13.6 Any proposed development that increases the volume of concentration of wastewater and is within the catchment areas of the River Usk and River Wye will need to evidence within a planning application that the development proposal is in accordance with the latest NRW guidance. Development proposals need to ensure they would not result in an unacceptable impact of the water quality of our SAC rivers.

10.13.7 In most cases there will be a requirement to connect to the public sewerage system. DCWW have confirmed that there is a firm commitment to secure improvements to their WwTW to reduce the amount of phosphates entering the water environment providing water quality improvement and capacity for new sustainable development.

Groundwater Source Protection Zones

10.13.8 Groundwater Source Protection Zones (SPZs) are defined by NRW as groundwater sources, such as wells, boreholes and springs that are used for public drinking water supply. The purpose of SPZs is to provide additional protection to safeguard drinking water quality and it is crucial we look after groundwater sources and take steps to minimise their risk of pollution. Certain types of proposed development with SPZ may have inherent risk of groundwater pollution, such as non-mains foul drainage systems. Development therefore that does not connect to the public sewer mains network in SPZs will not be acceptable.

10.13.9 A groundwater SPZ exists within Monmouthshire (covering the settlements Sudbrook, Portskewett, Caldicot, Crick, Caerwent, Llanvair Discoed and parts of Shirenewton) and is identified on the constraints map. All development proposals within the SPZ must be able to demonstrate that the proposal complies with sustainable resource management and that no contamination of the water supply will result from the development proposal.

Surface Water

10.13.10 Surface water should not connect to the public sewerage system. As set out in Strategic Policy S4 (Climate Change) and Policy CC1 (Sustainable Drainage Systems) the Council is committed to implementing a sustainable approach to surface water drainage and expects development to incorporate Sustainable Drainage Systems (SuDS) wherever possible. Further details of requirements for surface water management are set out in Policy CC1.

10.13.11 Development will only be allowed where provision is made for the necessary surface water infrastructure to protect water quality and capacity.

10.13.12 The provision of GI, including wetland habitats and woodland planting should be considered as flood attenuation solutions and as a measure to reduce surface water run-off. Where there are watercourses running through sites solutions should be found to leave the watercourse to run its natural course. New culverts, dams or impoundments should be avoided to maintain river connectivity which will benefit fish and other wildlife. Where there are existing impoundments, dams or culverts, solutions should be sought to have these removed and return the watercourses back to their natural state.

Policy NR3 – Protection of Water Sources and the Water Environment

Development, which may impact upon the water environment and associated land, will only be permitted where it:

a) Would not harm or pose an unacceptable risk to the capacity or flow of groundwater, surface water or coastal water systems;

b) Would not harm or pose an unacceptable risk to the quality and quantity of ground waters, surface waters, wetlands or coastal water systems including, where appropriate, their ecological and amenity value; and

c) Where practicable and reasonable, improves water quality,

10.14 Countryside Access

10.14.1 Monmouthshire has an attractive and extensive countryside access network that consists of footpaths, bridleways, byways and restricted byways as set out in the Council's Countryside Access Improvement Plan 2020- 2030 (CAIP). There are over 1,659km (excluding the BBNP area) Public Rights of Way (PROW), as well as permissive paths that support promoted routes such as the Wye Valley Walk, commons, Open Access, countryside sites, green and blue spaces.

10.14.2 Both PROW and associated permissive paths provide a gateway for visitors and residents to explore Monmouthshire's heritage, wildlife and landscapes. They support active travel, tourism, the local economy, provide safe routes and opportunities to access the open countryside and sustain and improve health and well-being. Only 11% of the network is either bridleways or restricted byways which can be used by walkers, cyclists and horse riders. This network is fragmented and limited; therefore it is the CAIP's objectives to improve countryside access and give more opportunities to access the outdoors near where residents live in line with the Wellbeing and Future Generations Act 2015 and complement the provisions of the Active Travel (Wales) Act and the Environment (Wales) Act.

10.15 Public Rights of Way (PROW) Network

10.15.1 Reflecting the objectives and vision of Monmouthshire's CAIP to improve countryside access, Policy PROW1 seeks to protect and enhance the County's PROW network.

10.15.2 It is recognised that the development of new residential, employment, retail, leisure and other sites provides an opportunity to improve and provide new links to the PROW network and this is also set out in the Plan's placemaking policies (S3, PM1 and residential allocation policies). Proposals should also explore the potential to incorporate bridleways into the development.

Policy PROW1 – Public Rights of Way

Any Public Rights of Way (PROW) affected by a development proposal will require retention or a successful Path Order to either move the PROW on to a suitable alternative or to extinguish the PROW. Any predicted adverse impacts on the character, safety, enjoyment and convenient use of a PROW must be mitigated.

Provision of additional routes where appropriate, will be sought in new developments with linkages to the existing network.

10.15.3 Monmouthshire County Council will use either planning conditions, planning obligations or informatives, where necessary to secure such protection or enhancements.

10.15.4 Development proposals that affect a PROW must include a plan accurately showing the existing routes so that the effect of the proposed development can be assessed.

10.15.5 The granting of planning permission for a development does not give permission to divert, extinguish or obstruct a PROW and is a separate permission to any legal consents that may be required in relation to diverting, changing or altering a PROW. Planning permission does not give authorisation for structures such as gates to be erected, or temporary or permanent closure or diversion. Where any kind of development which might affect a PROW is concerned, early contact with the relevant Public Rights of Way Team is recommended.

S5 - Links to Wider Policy Framework	
RLDP Objectives	Objective 3 – Green Infrastructure, Biodiversity and Landscape Objective 4 – Flood risk Objective 6 – Land Objective 7 – Natural Resources Objective 8 – Health and Well-being Objective 11 – Place-making Objective 12 – Communities Objective 14 – Infrastructure Objective 17 – Climate Change
Future Wales: The National Plan 2040 (WG, February 2021)	Policy 9 – Resilient Ecological Networks and Green Infrastructure Policy 15 – National Forest
Planning Policy Wales Edition 12 (WG, February 2024)	Distinctive and Natural Places Theme (Chapter 6)
Well-being of Future Generations Act (WBFGA) (WG, 2015)	A resilient Wales A healthier Wales A more equal Wales A Wales of cohesive communities A globally responsible Wales
Gwent PSB Well-being Plan (August 2023)	• Provide and enable the supply of good quality, affordable, appropriate homes. • Take action to reduce our carbon emissions, help Gwent adapt to climate change, and protect and restore our natural environment.
Taking Monmouthshire Forward - Community and Corporate Plan 2022 - 2028 (April 2023)	This policy supports the Community and Corporate Plan objectives of ensuring Monmouthshire is a: • Green place to live and work, with reduced carbon emissions, and making a positive contribution to addressing the climate and nature emergency. • Safe place to live where people have a home and community where they feel secure.
Key Evidence	Landscape Sensitivity Capacity Update Study (White Consultants, October 2020)

	LANDMAP Green Infrastructure Green Infrastructure Strategy 2019 Adopted Green Infrastructure SPG – April 2015 (to be reviewed as part of the RLDP process) Monmouthshire Countryside Access Improvement Plan (CAIP) 2020-2030 TAN5: Nature Conservation and Planning Monmouthshire The Nature Recovery Action Plan (NRAP) for Wales 2020-21 The Greater Gwent Nature Recovery Action Plan (NRAP) Monmouthshire Local Nature Recovery Action Plan (NRAP) (Draft April 2024) Wye Valley AONB Management Plan 2021-2026 The Welsh National Marine Plan (WNMP) Severn Estuary Shoreline Management Plan Gwent Levels Management Plan 2022

Infrastructure

11. Infrastructure Requirements

11.1.1 Adequate and efficient infrastructure is recognised in PPW12 as being crucial for economic, social and environmental sustainability. The RLDP recognises the need to ensure that appropriate infrastructure is already in place or can be provided to accommodate the level and locations of growth identified in the RLDP. The provision of a range of services and facilities is essential to delivering sustainable development and to meeting diverse community needs, and the provision of appropriate infrastructure will be supported by the Plan.

11.1.2 Infrastructure covers a range of services and facilities provided by public and private bodies and includes:

- Physical infrastructure such as transport facilities and related infrastructure (such as footpaths, cycleways), water provision and treatment, sewerage, flood prevention and drainage, waste disposal, power generation and supply, including renewables, digital infrastructure and telecommunications.
- Infrastructure such as schools, healthcare, transport services (including public transport), community buildings, community recycling facilities, sport and recreation facilities, open space, etc.
- Green and Blue Infrastructure (as detailed in Strategic Policy S5) such as woodlands, hedgerows, ponds, green spaces, designed sustainable drainage systems and trees.

11.1.3 Without appropriate investment to enable the provision of improved or new infrastructure, the proposed level of growth will be neither sustainable nor acceptable. New development will therefore be required to provide or contribute towards the provision of necessary infrastructure to enable it to be provided in a timely manner and to support sustainable development in Monmouthshire. Development will only be permitted when agreement has been reached between the relevant parties on the funding and programmed implementation of required provision in line with Policy S6.

11.1.4 Developers should consult and work with statutory undertakers and service providers to ensure that adequate provision is made for such infrastructure – this includes highways, utility services and surface water drainage and sewage disposal. Given Monmouthshire's rural character, the provision of adequate digital infrastructure is key to enhancing the County's economic and community connectivity and communication needs and reducing the need to travel.

11.1.5 Policy S6 will be delivered through the development management process. Planning contributions can be secured via agreements entered into under Section 106 of the Town and Country Planning Act 1990. Planning obligations are a means of seeking contributions from developers to enhance the quality of a development, provide community benefits and infrastructure, and mitigate any negative impacts that may arise as a consequence of the development. The Council will negotiate obligations where these are necessary, relevant to planning, directly related to the proposed development and reasonable in all other respects. Further guidance on the use of planning obligations is provided in PPW12 and Welsh Office

Circular 13/97 Planning Obligations. Supplementary Planning Guidance will be prepared to provide further detail on the Council's Planning Obligations policy.

11.1.6 An Infrastructure Delivery Plan has been prepared to accompany the RLDP (Appendix 8), which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of allocated sites. Appendix 8 sets out the key issues, constraints, policy and infrastructure requirements needed to deliver the Plans site allocations.

11.1.7 Where a viability assessment is deemed necessary, the Council will require applicants to provide detailed information and supporting evidence. The Council's policy requirements should be the starting point for viability appraisals with an expectation that land values will reflect these requirements. Where it is considered necessary to independently assess viability assessments, the costs will be borne by the developer.

Strategic Policy S6 – Infrastructure

Where existing infrastructure is inadequate to serve the proposed development, new or improved infrastructure and facilities must be provided as part of the proposed development to mitigate any likely adverse impacts. Where possible, infrastructure improvements should be provided prior to occupation. Where provision on-site is not appropriate, off-site provision, or a financial contribution towards it, will be sought.

Arrangements will be required towards the future management and maintenance of facilities provided, either in the form of initial support or in perpetuity, including the use of management companies where appropriate.

Planning agreements and obligations will be sought to secure improvements in infrastructure, facilities, services and related works, where they are necessary to make development acceptable. In identifying appropriate contributions, due regard will be paid to the overall development viability, including the cost of measures that are necessary to physically deliver a development and ensure that it is acceptable in planning terms. The requirements for such agreements/obligations will include consideration and appropriate provision of:

- Affordable housing
- Education facilities and/or required improvements
- Sustainable transport measures
- Transport infrastructure
- Recreation and leisure facilities including formal and informal open space
- Green and blue infrastructure
- Community and cultural facilities
- Welsh language including Welsh language facilities
- Ecological mitigation and enhancement
- Strategic utilities including water and sewerage infrastructure
- Waste management facilities
- Health infrastructure and/or facilities

In the event that viability considerations indicate that not all the identified contributions can be reasonably required, priority contributions will be determined on the basis of the

individual circumstances of each case. In the case of residential developments, priority will be given to the affordable housing requirement set out in Policy S7 unless there is an overwhelming need for the contribution, in whole or in part, to be allocated for other necessary purpose/s.

11.2 Telecommunication, broadband and other digital infrastructure

11.2.1 Electronic and digital infrastructure plays a pivotal role in maintaining the economic well-being in Wales, as well as being a social lifeline for many. Fast reliable broadband and telecommunication connections are therefore essential to meet the needs of communities. They also play an important role to both businesses, organisations and individuals, particularly when working from home which has become increasingly prevalent over recent years. PPW12 highlights this importance noting that it is a Welsh Government objective to offer fast and reliable broadband to every property in Wales and to support the deployment of mobile infrastructure across the Country. Furthermore, Future Wales outlines how digital communications infrastructure is vital to the future success and economic competitiveness of businesses, whilst supporting community and individual needs and requires new developments to include the provision of high-speed broadband infrastructure from the outset.

11.2.2 While many forms of electronic and telecommunications infrastructure are supported by extensive permitted development rights, Policy IN1 seeks to support any telecommunications and broadband infrastructure where it is required, while at the same time ensuring there are no environmental impacts or adverse impacts on residential amenity and/or the historic and natural environment.

Policy IN1– Telecommunication, broadband and other digital infrastructure

Telecommunication, broadband and other digital infrastructure proposals will be considered in light of technical and operational requirements and permitted where the following criteria are met:

a) The development relates to planned development/provision of a wider network;

b) The siting and appearance of the proposed apparatus and associated structures should seek to minimise impact on the visual amenity, character and appearance of the surrounding area and, the amenity of neighbouring residents;

c) There would be no significant adverse impact on the built or natural heritage or, the historic environment. Particular care should be given in the Wye Valley National Landscape (AONB) and adjacent the Bannau Brycheiniog National Park (BBNP);

The application is accompanied by evidence of compliance with Government guidelines on health impacts of telecommunications infrastructure.

Where new apparatus/structures are proposed, the application is accompanied by evidence that explores opportunities to utilise existing buildings, masts or structures in the first instance, and provides justification of why the application location is necessary.

S6 - Links to Wider Policy Framework	
RLDP Objectives	Objective 1 – Economic Growth/ Employment Objective 3 – Green Infrastructure, Biodiversity and Landscape Objective 4 – Flood Risk Objective 8 – Health and Well-being Objective 10 – Housing Objective 11 – Place-making Objective 12 – Communities Objective 13 – Rural Communities Objective 14 – Infrastructure Objective 17 – Climate Change
Future Wales: The National Plan 2040 (WG, February 2021)	Policy 13 – Supporting Digital Communications Policy 14 – Planning in Mobile Action Zones
Planning Policy Wales Edition 12 (WG, February 2024)	Strategic and Spatial Choices Theme (Chapter 3) – Supporting Infrastructure
Well-being of Future Generations Act (WBFGA) (WG, 2015)	A prosperous Wales A resilient Wales A more equal Wales A Wales of cohesive communities A globally responsible Wales
Gwent PSB Well-being Plan (August 2023)	• Enable and support people, neighbourhoods, and communities to be resilient, connected, thriving and safe. • Take action to address inequities, particularly in relation to health, through the framework of the Marmot Principles. • Take action to reduce our carbon emissions, help Gwent adapt to climate change, and protect and restore our natural environment.
Taking Monmouthshire Forward - Community and	This policy supports the Community and Corporate Plan objectives of ensuring Monmouthshire is a: • A Fair place to live where the effects of inequality and poverty have been reduced;

Corporate Plan 2022 - 2028 (April 2023)	• A Green place to live and work, with reduced carbon emissions, and making a positive contribution to addressing the climate and nature emergency; • A Thriving and ambitious place, where there are vibrant town centres, where businesses can grow and develop; • A Safe place to live where people have a home and community where they feel secure; • A Connected place where people feel part of a community and are valued. • A Learning place where everybody has the opportunity to reach their potential.
Key Evidence	• Infrastructure Delivery Plan • High Level Viability Assessment • Viability Assessments for Residential Site Allocations

New Housing

12. New Housing in Settlements

12.1.1 Strategic Policy S2 sets out those settlements that will be the primary focus for new housing developments in the County. Settlement boundaries have been drawn around Primary and Secondary Settlements (Policy H1) and Main Rural Settlements (Policy H2). There will be a presumption in favour of new residential development within these boundaries, subject to detailed planning considerations. Policy S2 also identifies Minor Rural Settlements, which although have no development boundaries, small infill development may be acceptable, subject to detailed planning considerations (Policy H3). Outside of the defined settlement boundaries, open countryside policies will apply (Policies H4, H5 and H6).

12.1.2 It should be noted that in sewered areas all development will be required to connect to the mains sewer. However, it is recognised that some of the settlements identified in Policies S2, H1 and H2 do not have existing mains sewer infrastructure. Where connection to the sewer is not possible, non-mains sewerage drainage may be acceptable in some instances. If a development area falls within a groundwater Source Protection Zone (SPZ) then connection to non-mains sewer will not be acceptable due to risk to groundwater pollution.

12.2 Residential Development in Primary and Secondary Settlements

Policy H1 – Residential Development in Primary and Secondary Settlements

Settlement boundaries have been drawn for the following Primary and Secondary Settlements identified in Policy S2:

Primary Settlements

- Abergavenny (inc. Llanfoist)
- Chepstow
- Monmouth (inc. Wyesham)
- Caldicot (inc. Severnside area comprising of: Caerwent, Crick, Magor Undy, Portskewett, Rogiet and Sudbrook)

Secondary Settlements

- Penperlleni
- Raglan
- Usk

Within the settlement boundaries new build residential development / redevelopment or conversion to residential, or subdivision of large dwellings or reuse of accommodation, such as upper vacant floors in town centres for residential use, will be permitted subject to detailed planning considerations and other policies of the RLDP that seek to protect existing retail, employment, community uses and tourism.

12.2.1 Developments allowed under this policy will need to make provision for affordable housing in accordance with Strategic Policy S7.

12.2.2 The settlement of Crick does not have existing mains sewer infrastructure and is located within a groundwater Source Protection Zone (SPZ). As noted above connection to non-mains sewer will not be acceptable in an SPZ due to risk to groundwater pollution.

12.3 Residential Development in Main Rural Settlements

Policy H2 – Residential Development in Main Rural Settlements

Settlement boundaries have been drawn for the following Main Rural Settlements identified in Policy S2:

- Devauden
- Dingestow
- Little Mill
- Llandogo
- Llanellen
- Llangybi
- Llanover

- Llanvair Discoed
- Mathern
- Pwllmeyric
- Shirenewton/ Mynyddbach
- St Arvans
- Tintern
- Trellech
- Werngifford/Pandy

Within the Settlement Boundaries of Main Rural Settlements planning permission will be granted for new residential development/redevelopment, or conversion to residential, or sub-division of large dwellings, subject to detailed planning considerations, including no unacceptable adverse impact on village form and character and surrounding landscape, and other policies of the RLDP that seek to protect existing retail, employment, community uses and tourism.

12.3.1 National policy contained in PPW12 provides a firm steer that new development should be directed to existing urban areas where there is greatest potential for reducing the need to travel due to the co-location of houses, jobs, shops, services and public transport facilities. Conversely, there is a clear message that in general, development should not be located in countryside locations where the absence of such facilities would inevitably lead to an increase in the need to travel, particularly by the use of the private motor car. Given the high levels of need for affordable housing for local people in rural areas of Monmouthshire, the RLDP spatial strategy seeks to provide an appropriate amount of housing development in those villages that have reasonable access to services and/or public transport, identified as Main Rural Settlements in Strategic Policy S2.

12.3.2 Developments allowed under this policy will need to make provision for affordable housing in accordance with Strategic Policy S7.

12.3.3 The settlement of Llanvair Discoed does not have existing mains sewer infrastructure and is located within a groundwater Source Protection Zone (SPZ). As noted above connection to non-mains sewer will not be acceptable in an SPZ due to risk to groundwater pollution.

12.4 Residential Development in Minor Rural Settlements

Policy H3 – Residential Development in Minor Rural Settlements

In the following Minor Rural Settlements planning permission will be granted for minor small scale rounding off or infilling of a small gap between existing buildings, of no more than 1 or 2 dwellings, or residential redevelopment, or conversion to residential or sub-division of large dwellings, subject to detailed planning considerations, including no unacceptable adverse impact on village form and character and surrounding landscape, and other policies of the RLDP that seek to protect existing retail, employment, community uses and tourism.

Minor Rural Settlements:

- Bettws Newydd
- Broadstone /Catbrook
- Brynygwenin
- Coed y Paen
- Cross Ash
- Cuckoo's Row
- Great Oak
- Grosmont
- Gwehelog
- Llanarth
- Llanddewi Rhydderch
- Llandegveth
- Llandenny
- Llangwm
- Llanishen
- Llansoy
- Llantilio Crossenny
- Llantrisant
- Llanvair Kilgeddin
- Llanvapley
- Mitchel Troy
- Penallt
- Penpergwm
- The Bryn
- The Narth
- Tredunnock

12.4.1 Strategic Policy S2 also identifies Minor Rural Settlements. These are settlements that, because of their size, form and absence of community facilities would normally only be considered suitable for minor infilling or rounding off of settlements within or immediately adjoining that settlement without encroachment into the open countryside, and of a scale appropriate to its size and role, except for the possibility of affordable housing on exception sites, i.e. sites where development would not normally be allowed other than to provide affordable housing.

12.4.2 Developments allowed under Policy H3 will need to make provision for affordable housing in accordance with Strategic Policy S7.

12.5 New Housing in the Open Countryside

12.5.1 In accordance with PPW12, the RLDP seeks to strictly control and reduce the environmental impact of new dwellings in the open countryside of Monmouthshire. The RLDP defines 'open countryside' as those parts of the plan area lying outside defined Primary, Secondary and Main Rural Settlement Boundaries or the physical boundaries of Minor Rural Settlements. New build

dwellings in the open countryside will not be permitted unless justified by the types of developments noted in Policy S2 and OC1.

12.5.2 PPW12 and TAN 6: Planning for Sustainable Rural Communities, set out clear statements of national policy on housing in the open countryside, such as One Planet and rural enterprise dwellings, and therefore are not repeated here as separate policies. Proposals for new dwellings in the open countryside will be assessed against this national policy framework. Where new built development is justified / permitted in the open countryside, Policy OC1 New Built Development in the Open Countryside will also apply.

12.6 Conversion / Rehabilitation of Buildings in the Open Countryside for Residential Use

Policy H4 – Conversion / Rehabilitation of Buildings in the Open Countryside for Residential Use

The conversion / rehabilitation of a building in the open countryside for residential use will be permitted where all the following criteria are met:

a) the form, bulk, materials and general design of the proposal, including any extensions, respect the rural character and design of the building;

b) the proposal, including curtilage and access, is in scale and sympathy with the surrounding landscape and does not require the provision of unsightly infrastructure;

c) rebuilding works, necessitated by poor structural conditions and / or the need for new openings in walls, should not involve substantial reconstruction, with structural surveys being required for marginal cases;

d) the more isolated and prominent the building, the more stringent will be the design requirements with regard to new door and window openings, extensions, means of access, service provision and garden curtilage, especially if located within the Wye Valley National Landscape (AONB);

e) buildings of modern and / or utilitarian construction and materials such as concrete block work, portal framed buildings clad in metal sheeting or buildings of substandard quality and / or incongruous appearance will not be considered favourably for residential conversion; and

f) the building is capable of providing adequate living space within the structure. Only very modest extensions and ancillary buildings will be allowed having regard to the context and scale of the existing building and normal permitted development rights to extend further or to construct ancillary buildings will be withdrawn.

12.6.1 There has been considerable demand for the rehabilitation and conversion of barns and vacant rural buildings into residential units in Monmouthshire. Reflecting this trend, Policy H4 sets out strict controls to be applied in the consideration of such proposals in order to ensure that

the conversion /rehabilitation of buildings does not detract from the special qualities of Monmouthshire's open countryside.

12.6.2 It is important that any proposals for the conversion / rehabilitation of buildings in the open countryside for residential use conserve the character and quality of Monmouthshire's countryside and natural heritage value. Such proposals will only be permitted where they meet the criteria set out in Policy H4 and other relevant policies of the plan / national guidance. Proposals should be sympathetic to the rural setting in terms of the particular location, appropriate design and traffic considerations. Policy H4 will also be applied to proposals to extend buildings that have already been converted.

12.6.3 In terms of criterion e), the Council will need to be satisfied at the time of the original application that adequate ancillary garaging and storage space can be achieved for the dwelling in order to avoid pressure for further, possibly harmful, development at a future date. Out buildings will not normally be acceptable except where modest in size and sensitively located. Similarly, conservatories are not considered suitable for barn conversions.

12.6.4 The conversion of buildings for tourism related uses will be required to satisfy the Policy T1.

12.6.5 The criteria set out in Policy H4 will be expanded upon in Supplementary Planning Guidance.

12.7 Replacement Dwellings in the Open Countryside

Policy H5 – Replacement Dwellings in the Open Countryside

The replacement of existing dwellings in the countryside will be permitted provided that:

a) the original dwelling
   i) is not a traditional farmhouse, cottage or other building that is important to the visual and intrinsic character of the landscape;
   ii) has not been demolished, abandoned its residential use or fallen into such a state of disrepair so that it no longer has the appearance of a dwelling;
b) the design of the new dwelling is of a form, bulk, size and scale that respects its setting;
c) the proposal does not require an unacceptable extension to the existing residential curtilage;
d) the replacement dwelling shall be of similar size to the replaced; and
e) any outbuildings should be modest in size and sensitively located and it can be demonstrated at the time of the original application that adequate ancillary garage and storage space can be achieved for the dwelling.

12.7.1 Policy H5 sets out detailed criteria to exercise control over replacement dwellings in the countryside in order to ensure that such development does not detract from the special qualities of the open countryside in Monmouthshire.

12.7.2 This policy seeks to retain those traditional dwellings that make a positive contribution to the County's rural character, and to ensure that replacement dwellings in the open countryside conserve the character and quality of Monmouthshire's countryside. A key consideration in

assessing the acceptability of proposals for replacement dwellings is visual impact in the landscape. It is important that replacement dwellings relate to a permanent, established and continuing residential use and that the scale/design (including residential curtilage) do not result in any greater impact on the character and quality of the area.

12.7.3 Policy H5 will be expanded upon in Supplementary Planning Guidance (SPG).

12.8 Extension of Rural Dwellings

Policy H6 – Extension of Rural Dwellings

In order to protect the character of the countryside, extensions to dwellings in the open countryside should be modest and respect or enhance the appearance of the existing dwelling. They will be required to:

a) be subordinate to the existing building; and

b) where the building is of a traditional nature, to respect its existing form, including the pattern and shape of openings, and materials.

12.8.1 This policy applies to proposals located outside of Tiers 1- 4 of the settlement hierarchy and aims to avoid over-extension of existing rural dwellings and the adverse impact that this has on the character / appearance of the open countryside. Large scale extensions can be particularly harmful if they result in the loss of the scale and character of traditional rural dwellings. Extensions will therefore be strictly controlled to limit their individual and cumulative impact. Proposals should ensure that the existing building remains the dominant form. The tendency to seek successive extensions to individual buildings will be restricted.

12.8.2 Policy H6 will be expanded upon in Supplementary Planning Guidance (SPG).

12.9 Specialist Housing

Policy H7 – Specialist Housing

Proposals for specialist housing development, and extensions to established specialist housing facilities, will be permitted within or adjacent to defined settlement boundaries where:

a) There is safe and convenient access to shops, services, community facilities and public transport appropriate to the needs of the intended occupiers;

b) It is appropriate for its intended residents and the neighbourhood in terms of form, scale and design, type and affordability of the accommodation, as well as the provision of support and care; and

c) It meets the affordable housing requirements of Policy S7 where the development falls within Use Class C3.

12.9.1 PPW12 states that a mix of market and affordable housing types should be planned for including the housing requirements of older people and people with disabilities, which is more

commonly termed 'specialist housing'. Specialist housing is intended to enable the occupants to live as independently as possible, but designed so that support can be provided on site. Specialist housing may be self-contained (C3 Use Class) or non-self-contained (C2 Use Class) and can be provided in a range of formats and can include:

- Age-restricted general market housing, generally aimed at those over 55, potentially with some shared amenities but without on-site support or care;
- Sheltered housing, typically purpose-built flats with some communal facilities, a warden and some support such as on-site assistance;
- Enhanced sheltered housing/assisted living, which will have additional services to enable people to retain independence;
- Extra care housing has additional care support for residents who may be less independent, and has access to medium to high level of care with 24- hour access to support services and registered care staff; and
- Residential care/nursing homes, for those with a high level of dependency and which have rooms within a residential building and provide a high level of care for daily living.

12.9.2 To ensure that residents of such housing are well integrated with the wider communities, sites for these facilities should be located withing or adjoining defined settlement boundaries and accessible to a range of services and facilities, such as GP surgeries and shops.

12.10 Housing Mix

12.10.1 In accordance with national guidance new housing developments in both urban and rural areas should incorporate a mix of market and affordable house types, tenures and sizes to cater for the range of identified housing needs and contribute to the development of balanced communities. This includes specific consideration of the differing needs of our communities. National guidance also makes clear that policies can be included to meet challenges and particular circumstances evident in their areas. As set out in the key issues and challenges section, one of the most fundamental challenges facing Monmouthshire's communities is housing affordability.

12.10.2 One of the core purposes of the RLDP is to provide urgently needed affordable housing within exemplar, mixed, sustainable and well-connected places, to assist in addressing the demographic and affordability challenges facing the County. A limited offer in terms of housing mix has implications for affordability. A range of homes, both in size and type is required to retain, attract and meet the needs of younger adult population age groups. While it is recognised that Low Cost Home Ownership (LCHO) can provide opportunities for first time buyers through starter homes, there is also a need to provide additional smaller market homes for those that do not meet the criteria of LCHO properties but cannot necessarily afford market homes in Monmouthshire.

12.10.3 While a range and choice of homes is needed to attract and retain younger age groups, it is recognised that there is also a requirement to meet the needs of an ageing population and those who want to live independently but require accessible or adapted accommodation. Policy H7 provides detail on specialist housing.

12.10.4 The provision of one, two and three bedroom homes comprising of flats, terraced and semi-detached house types will increase the choice of homes for single households, smaller families, young couples/mixed young households, as well as older households who would like to downsize. Bungalows and innovative single storey homes will be welcomed, where appropriate. It is expected that development proposals for sites of 10 or more homes should provide a range and mix of homes to assist in addressing the demographic and affordability challenges facing the County.

12.10.5 Policy H8 relates to all proposals of 10 or more homes that include market homes in their schemes, including site allocations. Priority will be given to the provision of small to medium size homes of 3 bedrooms or fewer. Proposals that predominately consist of large detached market properties of 4 bedrooms or more will not be supported. Homes should be designed so that they are flexible and responsive to the changing needs of the occupants over their lifetime.

12.10.6 The mix and tenure of affordable homes must be agreed with MCC's Housing and Communities Department and will be based on housing need, as set out in Policy S7 Affordable Housing.

12.10.7 Site promoters must take into account the most up to date housing evidence, as well as other relevant sources and demonstrate how they have considered housing mix in their proposals.

Policy H8 – Housing Mix

To assist in addressing the demographic and affordability challenges in Monmouthshire, development proposals of 10 or more homes must include a range and mix of house types, tenure and size, to be agreed by the Council.

Such development proposals must be accompanied by a statement setting out how the mix of market housing will assist in achieving balanced communities, including the site allocations included within the RLDP.

Affordable Housing

13. Affordable Housing

13.1.1 Good quality affordable homes are important in achieving poverty reduction, equitable prosperity and supporting the best start in life. A core RLDP objective is to deliver much needed affordable homes at pace and scale to help address inequality in both urban and rural communities. This reflects the aims of the Council's Community and Corporate Plan objectives ensuring our communities live in a fair and a safe place. The Council is committed to ensuring that 50% of the homes constructed on new site allocations will be for affordable housing.

Affordable Housing Target

13.1.2 The delivery of affordable homes across the County that seeks to address these issues is a key aim of the Plan, and an integral part of the general provision of housing in the RLDP. Economically viable and deliverable allocations will facilitate this aim and ensure communities have access to good quality affordable homes to meet a range of needs.

13.1.3 The Local Housing Market Assessment Refresh 2022- 2037 (LHMA)[36] (May 2024) estimates a net need of 453 affordable homes per annum for the Monmouthshire planning administrative area (excluding the BBNP area) for the first five years of the LHMA period (2022 – 2027), with a further 82 affordable homes per year for the remaining ten year period. The majority of the estimated affordable housing need relates to social rent accommodation (370 per year) with low cost home ownership (41 per year) and intermediate rent (42 per year) accounting for the remainder. This would represent an affordable housing requirement of 3,085 homes if extrapolated over the Plan period. This is not a realistic affordable housing target for the Plan and it is not expected to be as new development is only one of a variety of means of achieving a supply of affordable homes. However, as set out in Section 4 and the supporting text of Policy S1, affordable housing provision is a key issue for the County and forms an integral part of the overarching Strategy with 50% provision required on all new site allocations and sites of 20 homes and over within settlement boundaries (as identified in Tiers 1 – 3 of Policy S2).

13.1.4 The LHMA identifies the greatest social rent need is for one-bed homes. There is a particularly high need for one-bedroom social rent accommodation which has been influenced by the significant increase in homelessness presentations since the COVID pandemic. Although this need is particularly high, it is important to ensure that a mix of house types and tenures is provided on new developments in order to achieve balanced communities.

13.1.5 Monmouthshire has three Housing Market Areas (HMA) within its boundaries namely, Abergavenny, Chepstow and Monmouth, which are referenced within the LHMA[37] and should be referred to as appropriate.

[36] MCC Cabinet approved the LHMA Refresh 2022-2037 in May 2024 prior to submission to Welsh Government. The housing team are currently awaiting sign off from Welsh Government.

[37] The HMAs are not the same as the sub-market areas upon which the Council's viability evidence is based.

13.1.6 Prior to submission of any planning application, developers will be expected to liaise with the Council to agree the mix and tenure of units required to meet housing need. The Council will use the following definitions of affordable housing:

- Social rented housing – refers to homes let by Registered Social Landlords (RSLs) to households taken from the Council's Housing Register who are eligible for social rented housing. The rents are set at Welsh Government benchmark levels.
- Intermediate housing – refers to homes for sale and rent where prices or rents are above social rent levels but below market levels. All of these will be provided through a RSL or the Local Authority.
- Low Cost Home Ownership – refers to homes purchased either at less than open market value or with some form of financial assistance or subsidy such as shared equity or shared ownership housing.
- Neutral Tenure is where the tenure of housing is not predetermined but can vary according to needs, means and preferences of households to whom it is offered. This incorporates the tenures described above. This arrangement gives flexibility in that it allows the tenure type of a property to be set according to current need.
- Specialist affordable housing may be sought for people with specific accommodation requirements that may not otherwise be met and where a need has been identified. This can include sheltered retirement housing, adapted housing for households with a physical disability and supported housing, for example for young homeless people or people with learning difficulties.

13.1.7 The delivery option preferred by Monmouthshire County Council will be set out in the Affordable Housing SPG.

13.1.8 The Council requires affordable housing to be managed by a RSL approved for development, or the Local Authority in Monmouthshire, whereby procedures are already set in place to ensure that dwellings remain affordable in perpetuity.

13.1.9 All affordable housing needs to be developed to meet the standards set out by Welsh Government, currently set out in Welsh Development Quality Requirements (WDQR) 2021, unless otherwise agreed by the Council.

Affordable Housing Provision

13.1.10 Strategic Policy S7 provides detail of the thresholds at which affordable housing will be required. A High-Level Affordable Housing Viability Study has been undertaken as part of the RLDP evidence base, this demonstrates that on-site provision of 50% affordable homes is achievable throughout most of the County on sites of 20 homes or more. On sites of 5-19 homes, on-site provision of 40% affordable homes is evidenced to be achievable. The affordable housing thresholds set out in Policy S7 reflect the outcomes of this work. Financial contributions will be required for sites that fall beneath the thresholds set out in Strategic Policy S7, further detail of such contributions is set out in paragraphs 12.1.12 – 12.1.13.

13.1.11 The Council will seek to provide affordable housing on-site. Only in exceptional circumstances will off-site provision be considered. This might occur, for instance, in situations where the management of the affordable housing cannot be effectively secured. In such cases it may be

possible for off-site new build housing or refurbishment/conversion of existing properties to provide a satisfactory alternative that meets the needs of the local community. Such schemes would be subject to specific financial arrangements, further detail of which will be included in Supplementary Planning Guidance.

13.1.12 In the exceptional circumstances and not on the strategic site allocations, where on-site provision is not considered appropriate and off-site units cannot be delivered as an alternative site is not available, the Council will consider accepting an affordable housing contribution payment in lieu of on-site affordable housing provision. Where this is the appropriate approach, prior to obtaining planning permission, applicants will need to enter into a S106 agreement to pay a financial contribution towards affordable housing in the HMA in which the site is located. The methodology for calculating this financial contribution will be included in Supplementary Planning Guidance. A financial contribution towards affordable housing will have an impact on land values and landowner expectations, therefore, the Council will expect that applicants have considered in full the overall cost of development, including the required financial contribution towards affordable housing, and any abnormal costs, when negotiating the purchase of land.

13.1.13 Affordable housing will be required on sites below the thresholds set out in Policy S7 if the Council considers that there has been a deliberate attempt to subdivide the site, phase the total development or reduce the density in an attempt to avoid the threshold.

13.1.14 All new residential planning applications, including resubmissions of proposals that have not been delivered previously, must comply with the provisions set out in Policy S7.

Brownfield Sites

13.1.15 The majority of the financial viability assessments that have been undertaken for housing allocations in the RLDP relate to greenfield sites; as does the evidence from the high-level assessments used to inform the policy approach for windfall sites.

13.1.16 It is a recognised principle that abnormal costs associated with a development should generally be reflected in the value paid to the landowner. There may, however, be cases where the combined impact on site value of abnormal development costs and other appropriate planning requirements for a proposed development would result in a residual land value that is insufficient to provide both an adequate profit margin for the developer, and a land value sufficient to encourage a reasonable landowner to sell for the proposed use. In such cases, the Council may be prepared to negotiate on the number of affordable dwellings that is required to deliver a viable development scheme. Any such cases will involve a detailed and "open book" financial viability assessment of the proposed development.

13.1.17 The same principle may apply to the conversion of existing buildings to residential use; although the affordable home thresholds set out in Policy S7 will still be the thresholds that landowners and developers must consider when agreeing all land transactions.

S7 – Affordable Housing

The affordable homes target for the Plan period of 2018 – 2033 is **1,595 – 2,000** homes. This will be delivered in accordance with the following framework:

i) **New site allocations** – On-site provision of 50% affordable homes on all new site allocations.

ii) **Sites of 20 homes and over** – On-site provision of 50% affordable housing applies to development proposals on sites within existing settlement boundaries as identified in Tiers 1-3 of Strategic Policy S2.

iii) **Sites of 5 to 19 homes** – On-site provision of 40% affordable housing applies to development proposals on sites within existing settlement boundaries as identified in Tiers 1-3 of Strategic Policy S2.

iv) **Sites of 1 to 4 homes** – Financial contributions towards the provision of affordable housing in the local planning authority area will be required in accordance with details set out in the Affordable Housing Supplementary Planning Guidance.

v) **Conversions and sub-divisions** – Financial contributions towards the provision of affordable housing in the local planning authority area will be required in accordance with details set out in Affordable Housing Supplementary Planning Guidance.

In determining how many affordable homes should be provided on a development site, the figure resulting from applying the proportion required to the total number of dwellings will be rounded to the nearest whole number, where half rounds up.

All proposals must meet national policy guidance in relation to the most efficient use of land and should not be subdivided or phased in an attempt to avoid on-site provision of affordable homes.

This Strategic Policy applies to all residential planning applications. Exceptions will not be made for sites that previously had planning permission and have been resubmitted.

13.2 Affordable Housing Exception Sites

13.2.1 Strategic Policy S1 identifies the preferred growth strategy for the County with a focus of growth in the County's most sustainable settlements in accordance with the settlement hierarchy set out in Strategic Policy S2. While it is recognised the allocated housing sites will provide 50% affordable homes, it is not always possible to meet the locally identified need for affordable housing in existing settlements. Furthermore, not all settlements will have an allocated site in their locality. National planning guidance encourages the use of an affordable housing exceptions policy to help meet affordable housing requirements and support communities. As a result, Policy H9 allows the provision of small 100% affordable housing sites adjoining existing settlements, which would not otherwise be allocated for housing.

13.2.2 Any proposals for 100% affordable housing exception sites must be proven to meet genuine local need and be supported by appropriate evidence to support this. This local need would normally relate to the part of the town or community council area in which the site is located. Evidence of local need is set out in the LHMA. All affordable housing exception sites must provide affordable housing to meet locally identified need in perpetuity. As noted above, the Council's preference is for affordable housing schemes to be managed by Registered Social

Landlords (RSL), secured through a S.106 agreement. Effective and early partnership between site promoters and RSLs is therefore encouraged.

13.2.3 Policy H9 sets out the development thresholds for 100% affordable housing exception sites which are considered acceptable in each of the settlement hierarchy tiers. It is recognised that there may be a need for flexibility in this approach, for example, where there is an overwhelming need for smaller homes. Any exceedance must be agreed with the Council.

13.2.4 Prior to submission of any planning application developers will be expected to liaise with the Council to agree the mix and tenure of units required to meet housing need.

Policy H9– Affordable Housing Exception Sites

Favourable consideration will be given to the siting of 100% affordable housing exception sites adjoining Tier 1, 2, 3 and 4 settlements identified in Strategic Policy S2, that would not otherwise be released for residential development provided that all of the following criteria are met:

a) The scheme meets a genuine local need which could not otherwise be met within the locality;

b) The proposed homes are of a size, tenure and design which is commensurate with the identified affordable housing need of the locality;

c) The proposal relates to:

   i) 25 or less homes in Tier 1 Primary Settlements,

   ii) 15 homes or less in Tier 2 Secondary Settlements,

   iii) 10 homes or less in Tier 3 Main Rural Settlements or

   iv) 5 homes or less in Tier 4 Minor Rural Settlements;

d) The site represents a logical extension to the existing settlement with no significant adverse impact on settlement form, character and surrounding landscape;

e) The affordable housing meets the needs of local people and will be managed by a Registered Social Landlord (RSL) in perpetuity, which will be secured via a S.106 legal agreement. In exceptional circumstances where an RSL is not involved, clear and adequate legal agreements must be in place to ensure that the benefits of affordable housing will be secured for initial and subsequent occupiers.

S7 - Links to Wider Policy Framework	
RLDP Objectives	Objective 9 – Demography Objective 10 – Housing Objective 11 – Place-making Objective 12 – Communities Objective 13 – Rural Communities

Future Wales: The National Plan 2040 (WG, February 2021)	Policy 2 – Shaping Urban Growth and Regeneration – Strategic Placemaking Policy 3 – Supporting Urban Growth and Regeneration – Public Sector Leadership Policy 4 – Supporting Rural Communities Policy 7 – Delivering Affordable Homes Policy 33 – National Growth Area – Cardiff, Newport and the Valleys
Planning Policy Wales Edition 12 (WG, February 2024)	Active & Social Places Theme (Chapter 4)
Well-being of Future Generations Act (WBFGA) (WG, 2015)	A resilient Wales A more equal Wales A Wales of cohesive communities
Gwent PSB Well-being Plan (August 2023)	• Take action to reduce the cost-of-living crisis in the longer term. • Provide and enable the supply of good quality, affordable, appropriate homes. • Enable and support people, neighbourhoods, and communities to be resilient, connected, thriving and safe. • Take action to address inequities, particularly in relation to health, through the framework of the Marmot Principles.
Taking Monmouthshire Forward - Community and Corporate Plan 2022 - 2028 (April 2023)	This policy supports the Community and Corporate Plan objectives of ensuring Monmouthshire is a: • A Fair place to live where the effects of inequality and poverty have been reduced; • A Safe place to live where people have a home and community where they feel secure; • Connected place where people feel part of a community and are valued.
Key Evidence	Updating the RLDP Demographic Evidence Report, Edge Analytics November 2021 Housing Background Paper – October 2024 Monmouthshire Local Housing Market Assessment – May 2024 High Level Viability Assessment Viability Assessments for Allocations

Residential Allocations

14. Residential Site Allocations

14.1.1 Policies S1 and S2 provide information on the breakdown of housing components making up the housing provision figure of 6,210 homes (including 15% flexibility allowance). New housing allocations will contribute 2,130 homes and a further 175 homes from Rollover LDP sites (2,305 total homes) towards meeting the housing provision figure. Policy S8 sets out the placemaking principles that apply to all residential sites allocations. Policies HA1 – HA18 detail the new housing allocations policies setting out specific requirements associated with each site.

HA1- HA18 – Residential Site Allocations

In order to deliver the housing requirement identified in Policy S1, the following sites are allocated for residential development in the period up to 2033:

Site Ref	Site Name	Settlement	Site Area (ha)	Approximate No. Homes in Plan Period	Approximate No. Affordable Homes in Plan Period
Strategic Sites (Tier 1 Settlements)					
HA1	Land to the East of Abergavenny	Abergavenny	35.9	500	250
HA2	Land to the East of Caldicot/North of Portskewett	Caldicot	64	770	385
HA3	Land at Mounton Road	Chepstow	12.8	146	73
HA4	Land at Leasbrook	Monmouth	11	270	135
Primary Settlements/Severnside (Tier 1 Settlements)					
HA5	Land at Penlanlas	Abergavenny	6.17	100	50
HA6	Land at Rockfield	Monmouth	1.5	60	30

HA7	Land at Drewen Farm	Monmouth	6.6	110	55
HA8	Tudor Road, Wyesham	Monmouth	2.1	50	25
HA9	Land at Former MoD	Caerwent	4.2	40	20
Secondary Settlements (Tier 2 Settlements)					
HA10	South of Monmouth Road	Raglan	4.5	54	27
HA11	Land East of Burrium Gate	Usk	2.6	40	20
HA12	Land West of Trem yr Ysgol	Penperlleni	3.4	42	21
Main Rural Settlements (Tier 3 Settlements)					
HA13	Land adjacent to Piercefield Public House	St Arvans	1.1	16	8
HA14	Land at Churchfields	Devauden	1	20	10
HA15	Land East of Little Mill	Little Mill	1.68	20	10
HA16	Land North of Little Mill	Little Mill	0.87	15	8
HA17	Land adjacent to Llanellen Court Farm	Llanellen	1.56	26	13
HA18	Land West of Redd Landes	Shirenewton	1.76	26	13
			Total Units	2,305	1,153

14.1.2 A housing trajectory accompanies the site allocations, summarising annual phasing information for all allocated sites within the Plan, setting out the expected rate of housing

delivery throughout the Plan period. This will form the basis for the ongoing monitoring of housing delivery in the County. The housing trajectory is set out in Appendix 9.

Residential Site Allocations Placemaking Principles

14.1.3 Policy S3 – Sustainable Placemaking and High-Quality Design sets out the strategic objectives for all development to create sustainable places to live, work and relax. Building on these strategic objectives, Policy S8 establishes key placemaking principles that should be incorporated into the residential site allocations. It covers a range of policy requirements including housing mix and tenure, landscape and biodiversity and sustainable travel expectations. Collectively these placemaking principles will help create sustainable housing developments that provide well-connected and balanced communities that are also respectful of Monmouthshire's natural and historical environment. The placemaking principles are supplemented by site specific requirements, which are set out below.

Strategic Policy S8 – Site Allocation Placemaking Principles

All residential site allocations must comply with and incorporate the following placemaking principles into the schemes:

Sustainable Communities

- Creation of a high-quality and well-connected extension to the settlement, which responds to its edge of settlement location. Where appropriate, the layout will identify and respect key views to and from the wider landscape setting.
- Provision of 50% affordable homes on-site comprising a mix of housing types and tenures to meet local need.
- Dwellings built to net zero carbon standards, including the incorporation of renewable energy generation technologies and low carbon heating systems and ULEV charging points.
- Provide a mix of house types, tenures, sizes, materials and colour to be developed at an appropriate density.
- Broadband /digital infrastructure must be provided to serve each new home.

Green Infrastructure, Landscape and Nature Recovery

- Make provision within the development for appropriate green infrastructure, multifunctional streetscapes and useable public open space in accordance with National Policy and agreed standards, including play and recreation provision, community growing opportunities and accessibility for all.
- Demonstrate a proposal that is informed by the surrounding landscape character and reflects the distinctive landscape character, qualities and sensitivities of the area.
- Take a proactive approach to deliver a net benefit for biodiversity and ecosystem resilience within the development site by maintaining, incorporating and enhancing semi-natural habitats and ecological connectivity between them.

- Ensure the protection and enhancement of biodiversity through appropriate building design, site layouts, lighting proposals that retain dark corridors, landscaping techniques and choice of plant species.
- Ensure that trees, woodland and hedgerows along site boundaries and within the site are retained and protected as far as possible with adequate space to allow access for maintenance and to maintain functional and viable wildlife corridors and green infrastructure assets.

Sustainable Travel and Highways

- Design of the site and its connections must prioritise active travel to local trip attractors and public transport, in line with the Sustainable Transport Hierarchy (PPW12/Wales Transport Strategy). Active Travel Act guidance should be applied to routes, facilities and sustainable transport promotion.
- Sites must contribute to active travel and public transport improvements as necessary.
- Ensure that the development does not adversely affect the safety, capacity and operation of the highway network.
- Streets must be designed and built to adoption standards in accordance with national and local design standards and offered for adoption pursuant to the requisite highway adoption agreements.

Education Requirements

- Sites must contribute to primary and secondary school provision in the area in accordance with capacity requirements.

Residential amenity

- Ensure a safe, secure, pleasant and accessible environment for all members of the community.
- Maintain reasonable levels of privacy and amenity of occupiers of neighbouring properties.
- Incorporate satisfactory air quality measures for mitigating and/or reducing emissions, as appropriate.
- Incorporate good acoustic design which must be compatible with thermal comfort by ensuring adequate ventilation and avoidance of overheating, in the interests of protecting residents from the harmful effects of noise.

Flood Risk and Sustainable Drainage Systems

- Potential flood risk to, or as a consequence of, the development of the site must be suitably assessed in accordance with national planning policy.
- The development must manage surface water through a sustainable drainage system in accordance with Welsh Government's Statutory Standards for Sustainable Drainage Systems 2018. The distribution of SuDS features across the site should be prioritised, reducing the size of any single SuDS feature.

Site specific considerations are set out in Policies HA1 to HA18.

14.2 Residential Allocations

14.2.1 In addition to the placemaking principles set out in Policy S8, each residential allocation has specific requirements that are set out in the site allocation policies below.

Strategic Housing Allocations

14.3 Land to the East Abergavenny East

14.3.1 This strategic site allocation is a sustainably located edge of settlement site. The site is located on the eastern edge of Abergavenny and is bounded by the A465 and railway line to its western boundary and the footslopes of the Ysgyryd Fach (Little Skirrid) to the east. Development here will expand the built-up area of the town beyond the railway line and A465 which currently form a hard development boundary to the town. The site will form a well-connected mixed-use urban expansion to Abergavenny containing a mix of residential uses alongside employment/commercial uses, associated facilities and services. The allocation represents the intended future direction of development in the Abergavenny area with the longer-term intention for further growth beyond the Plan period.

14.3.2 The creation of an exemplar residential-led, mixed-use community is a key principle behind the allocation. Densities, street patterns and design must be responsive to the character of Abergavenny. A network of permeable streets that connect the site internally and with the wider area is integral to the development. Similarly, maximising the potential of green infrastructure and open space provision and creation of focal points for the community is critical to the placemaking objectives associated with the site. A masterplan, establishing a design code and key land use parameters is being prepared and agreed for the site. Input from the Design Commission for Wales has helped shape the site's progression to date.

14.3.3 The greenfield allocation is a residential-led, mixed use development including 50% affordable housing, net zero carbon homes and green infrastructure provision, which will form a sustainable urban extension of Abergavenny. The western end of the site plays an important role in integrating the new neighbourhood with the railway station and wider Abergavenny and offers potential to provide a 'community hub' serving both the urban extension and the railway station area, park and ride facility for the railway station, and linkages to and from the allocation to the station and Abergavenny.

14.3.4 The integration of the strategic site with the existing settlement is a key principle in the site's development and identifying connection links that provide crossings across the railway line and the A465 is a key focus for the site. There are a number of options being explored including at grade signalled crossings across the A465 and utilising existing bridges at the train station, as well a new continuous bridge over the A465 and railway. A further option is the downgrading and reimagining of the A465 to change the character and environment of the trunk road in the vicinity of the allocation. All options involve a multi-agency and multi-disciplinary approach reflecting that the A465 is in Welsh Government's control and the railway in Transport for Wales and Network Rail's control. These parties are in active dialogue in promoting the site and the associated infrastructure and are in principle accepting of the delivery of this extension to the settlement.

14.3.5 The site is also within the River Usk phosphorus sensitive catchment area.

Policy HA1 - Land to the East of Abergavenny

Allocated as a residential-led mixed-use development

Development of the site should accord with the following parameters, placemaking principles and development requirements, which should be delivered in an appropriately phased manner and be formally tied to planning consents.

Site Area	Allocation Type	Number of Homes
Total Site: 35.9 ha	Strategic Mixed-use Development including: • Residential • Mixed-use Neighbourhood Centre • Park & Ride • B1 Use Class Uses	Approx. No. of homes: 500* Open Market: 250 Affordable Homes: 250

*Within the Plan period

In addition to the Placemaking Principles identified in Policy S8, the site must comply with the following:

Sustainable Communities

a) To provide a mixed-use development containing the following key uses:
   - Approximately 500 homes* including 50% affordable homes.
   - A minimum 1 hectare of B1 Use Class uses.
   - A neighbourhood centre, the uses and scale of which to be agreed by MCC.
   - Green infrastructure and open space provision, including allotments/community food growing spaces, incorporating the creation of focal points for the community.
   - Park and ride facility serving Abergavenny Railway Station.
   - Active travel connections with visible, prioritised routes to/from the site to the Railway Station and Abergavenny.

b) The completion of non-residential elements must be delivered in line with an agreed phasing programme.

c) The site design and masterplanning should create an exemplar of residential and GI-led placemaking, establishing clear parameters and principles to be followed by site developers.

d) Provision of an appropriate design response and interface between the western edge of the development and the A465 corridor that respects the importance of the visual connectivity between the site and existing settlement and is in keeping with the distinct character of Abergavenny.

e) A balanced approach to densities should be provided that makes efficient use of land and reflects the character of Abergavenny while also respecting the character of the surrounding landscape.

f) Higher densities should be focussed on western and central locations and towards key attractors such as the mixed-use centre and Railway Station. Lower density development may be appropriate along the eastern boundary to retain the visual and physical integrity of the urban/countryside edge and maintain the distinct landscape character of Abergavenny.

g) Densities and layout should respect the changes in levels within the site.

Green Infrastructure, Landscape, and Nature Recovery

h) Site design and layout should include opportunities to capture views of the wider landscape including the Bannau Brycheiniog National Park (BBNP) and the Usk Valley.

i) Development must ensure the retention and protection of substantial GI assets as far as possible, including retaining and enhancing tributaries of the River Gavenny.

j) Hedgerows along the site boundary should be retained with adequate space to allow access for maintenance and to maintain functional and viable wildlife corridors.

k) Any tree loss associated with the redesign of the A465 corridor must be subject to appropriate compensatory planting.

Sustainable Travel & Highways

l) A connectivity strategy setting out the number, location, form and delivery of connectivity points between the site and existing settlement of Abergavenny will be agreed with the Local Planning Authority. The strategy will include changes to the character and environment of the A465 to provide safe and accessible crossings and means of access(s) and appropriate crossings over the railway line.

m) Off-site highway infrastructure improvements must be delivered as necessary, having regard to requirements arising from the Transport Assessment and including:
- An agreement with the Highway Authority for the proposed accesses and junction on to the A465.
- Emergency secondary access on to Garth Road.

n) Make provision for good quality, safe, legible and accessible pedestrian and cycle linkages to key access points including linkages to the local schools, Abergavenny town centre and bus transport services.

o) Incorporate and enhance the existing Public Right of Way footpaths as key connection routes running through the site linking up with wider Abergavenny and as a through route to the wider countryside.

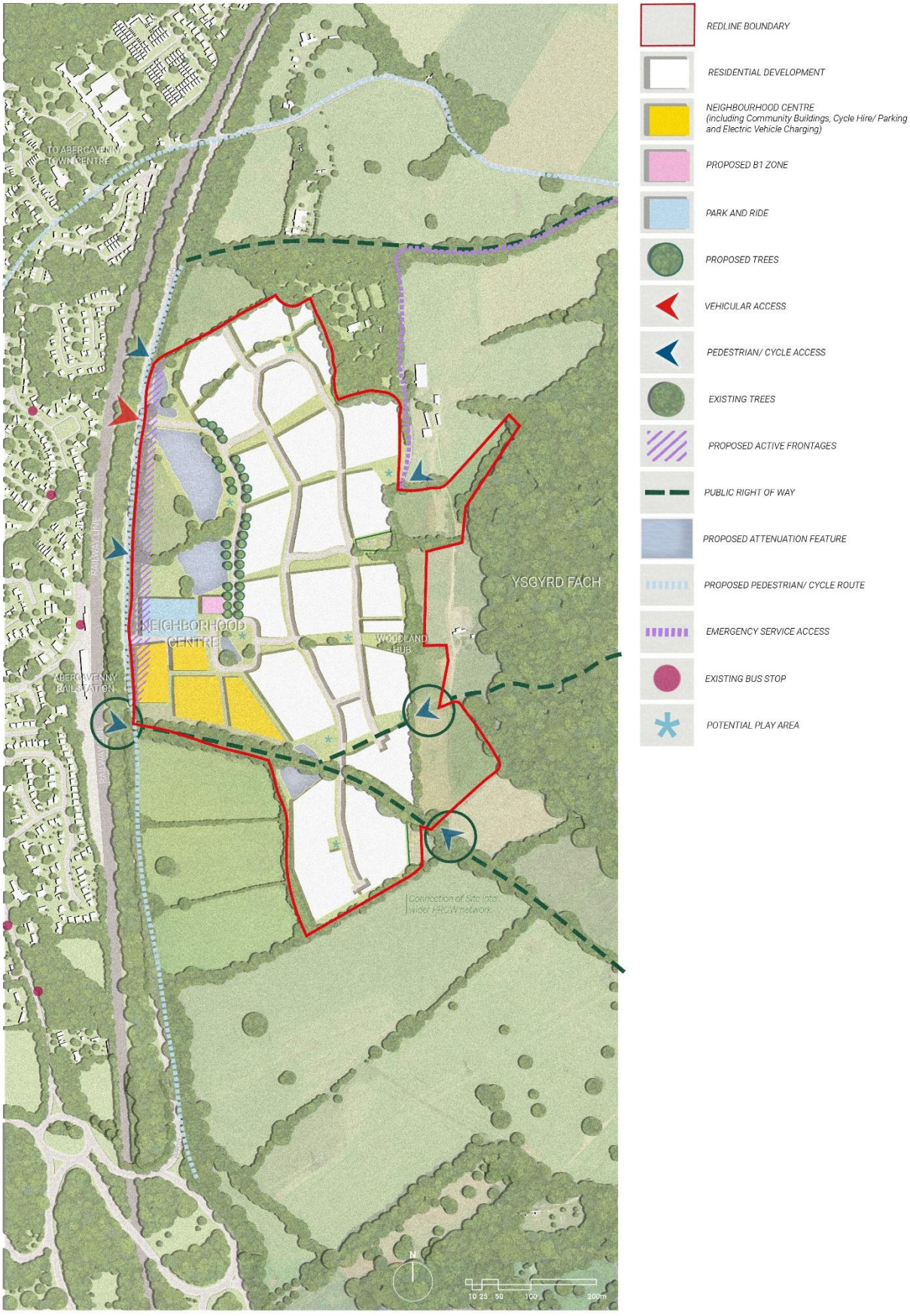
p) Make provision for a bus link into the site design and, if necessary, a financial contribution towards improved public transport and bus frequency.

Air Quality

q) Incorporate satisfactory air quality measures for mitigating and/or reducing emissions.

A masterplan establishing key design and placemaking principles is being prepared and will be agreed with the Local Planning Authority prior to the determination of any planning application.

Indicative Masterplan: Land to the East of Abergavenny



14.4 Land to the East of Caldicot/North of Portskewett

14.4.1 Land to the East of Caldicot/North of Portskewett is a sustainably located edge of settlement site. Development here will extend the settlement of Caldicot to the north-east, adjacent to the Crick Road, Portskewett site. Development will take place north of the Caldicot Castle Country Park, a Conservation Area and Area of Amenity Importance. No built development will take place in these sensitive areas. The site is located to the south of a Council owned solar farm, opportunities to link the site with this renewable energy resource are being explored. The site includes previously developed land comprising a commercial equestrian centre, with much of the remainder being greenfield Council-owned land. The inclusion of such suitable land is supported by Future Wales Policy 3 which supports public leadership and the use of public land to deliver on ambitious affordable housing targets.

14.4.2 This strategic site will provide a residential-led mixed-use development delivering net zero carbon homes of which 50% will be affordable, along with a primary school, a local centre, public open space, appropriate community facilities and employment uses. The site will form a new neighbourhood of Caldicot with links to Portskewett to the east. The primary school will bring benefits for the wider community serving both the new development and the nearby homes in both Caldicot and Portskewett. The school combined with the local centre will provide a key focal point of the site.

14.4.3 Crick Road provides a central spine through the development and will be incorporated into the site as an active frontage providing legibility for the community across the site. This will act as a gateway to the site as a whole and ensure the development either side of the road is integrated in a cohesive manner. Permeability is key to enabling integration both within the site and the surrounding area. Given the proximity to heritage designations and its edge of settlement location, the development will have a strong sense of place with an emphasis on sympathetic architectural form, high-quality design and include a logical street hierarchy with an appropriate residential density. A masterplan is being developed for the site, which identifies key issues and opportunities within the site as well as establishing a design code and key land use parameters. Input from the Design Commission for Wales has helped shape the site's progression to date.

14.4.4 An active travel link is required which will provide access to the site all year round. An east-west active travel link is also integral to the development of the site to provide a clear multi-user connection to the centre of Caldicot through the parkland area, ensuring accessibility to the wider town. It is, however, recognised that this may provide more of a recreational link at certain times of the year. Furthermore, the area to the west of the former railway also includes a number of constraints, and particular consideration will need to be given to the Nedern Brook wetlands SSSI. A further connection to the former MoD railway cycle and walking route (Greenway) between Crick and Caerwent will be included within the proposals.

14.4.5 The site is 1.1km from the Severn Estuary European Marine site (EMS). The Habitats Regulations Assessment acknowledges that proposals within Severnside could have a Likely Significant Effect on the EMS via recreational pressure and functionally linked land which will need to be considered.

Policy HA2 - Land to the East of Caldicot/North of Portskewett

Allocated for a residential-led mixed-use development.

Development of the site should accord with the following parameters, placemaking principles and development requirements, which should be delivered in an appropriately phased manner and be formally tied to planning consents.

Site Area	Allocation Type	Number of Homes
Circa 64ha	Strategic Mixed-Use Development including: • Residential • Primary School • Mixed use Neighbourhood Centre • B1 Use Class Employment • Strategic public open space	Approx No. of Homes: 770 Open Market Homes: 385 Affordable Homes: 385

In addition to the Placemaking Principles identified in Policy S8, the site must comply with the following criteria below:

Sustainable Communities

a) Provision of a mixed-use development containing the following key uses:
   - 770 homes including 50% affordable homes.
   - Primary School.
   - Strategic public open space, including community playing fields, allotments, community orchard and green infrastructure provision.
   - A neighbourhood centre including appropriate community facilities, the uses and scale of which to be agreed by MCC.
   - A minimum of 1ha B1 Use Class employment land.

b) Crick Road must be incorporated into the site as an active street frontage providing cohesion and a gateway for the development as a whole.

c) The design and masterplanning of the site should create an exemplar of residential and GI-led placemaking, establishing clear parameters and principles to be followed by site developers.

d) The completion of non-residential elements must be delivered in line with an agreed phasing programme.

Green Infrastructure, Landscape and Nature Recovery

e) Development of the site to consider existing topography, assets, features and contours of the site and include measures to integrate development appropriately while reducing visual impact. Less dense development should be provided on the edge of the site.

f) Development should consider and respond positively to the setting of the Grade II Listed Building, the Conservation Area, Country Park and views to the nearby Scheduled Ancient Monument. No built development will take place within these sensitive areas.

g) Recognition of the impact, scale and location of the site on the Severn Estuary European Marine Site (EPS) and Nedern Brook Site of Special Scientific Interest (SSSI). Interface between the SSSI and built development (including areas of formal recreation) requires careful design to avoid increased disturbance to qualifying features. No built development or additional access/transport routes shall occur within the SSSI.

h) The site is within the 12.6km Core Recreational Catchment Zone for the Severn Estuary European Marine Site and will be considered for a financial contribution as part of the Mitigation Strategy for the site. Green space design must consider any emerging guidance for Suitable Alternate Natural Greenspace (SANG) to reduce recreational pressure on the features of the Estuary.

i) Mount Ballan SINC and other woodland areas will be retained and protected with an appropriate buffer.

j) Include opportunities for grassland and hedgerow restoration, wetland creation and woodland connectivity that will be managed appropriately for protected species.

k) Include opportunities for grassland area enhancement and enhanced native planting around ponds and wetland areas that will be managed appropriately for protected species. No built development will take place in the SSSI.

l) The proposal will be accompanied by a lighting scheme. Dark corridors should be maintained and light spillage on to wildlife corridors is minimised, with particular reference to corridors and priority habitats used by bats and dormice present on the site.

m) Public Rights of Way within the site must be incorporated into the site design and remain available for public use.

Sustainable Travel and Highways

n) The site must incorporate on and off-site measures to provide good quality, attractive, safe, legible and accessible pedestrian and cycle linkages both to and within the new development area. Key connections include an active travel route to Caldicot Town Centre. Connection should also be made to the former MoD railway cycle and walking route.

o) Provision of off-site highway infrastructure improvements as necessary, having regard to requirements arising from the Transport Assessment and including:

- An agreement must be entered into with the Council to facilitate the construction of multiple development accesses along Crick Road and any necessary access points along the B4245 to the north of the site;
- A minimum of a 2 metre footway for pedestrians over the site's frontages linking to existing footways;

- Revision of speed limits along Crick Road to 20mph, the location of which to be agreed with MCC.
- Provision of a public transport link to be provided along Crick Road and throughout the site, details of which to be agreed with MCC, including any necessary financial contributions to improve nearby infrastructure.

Flood Risk and Sustainable Drainage Systems

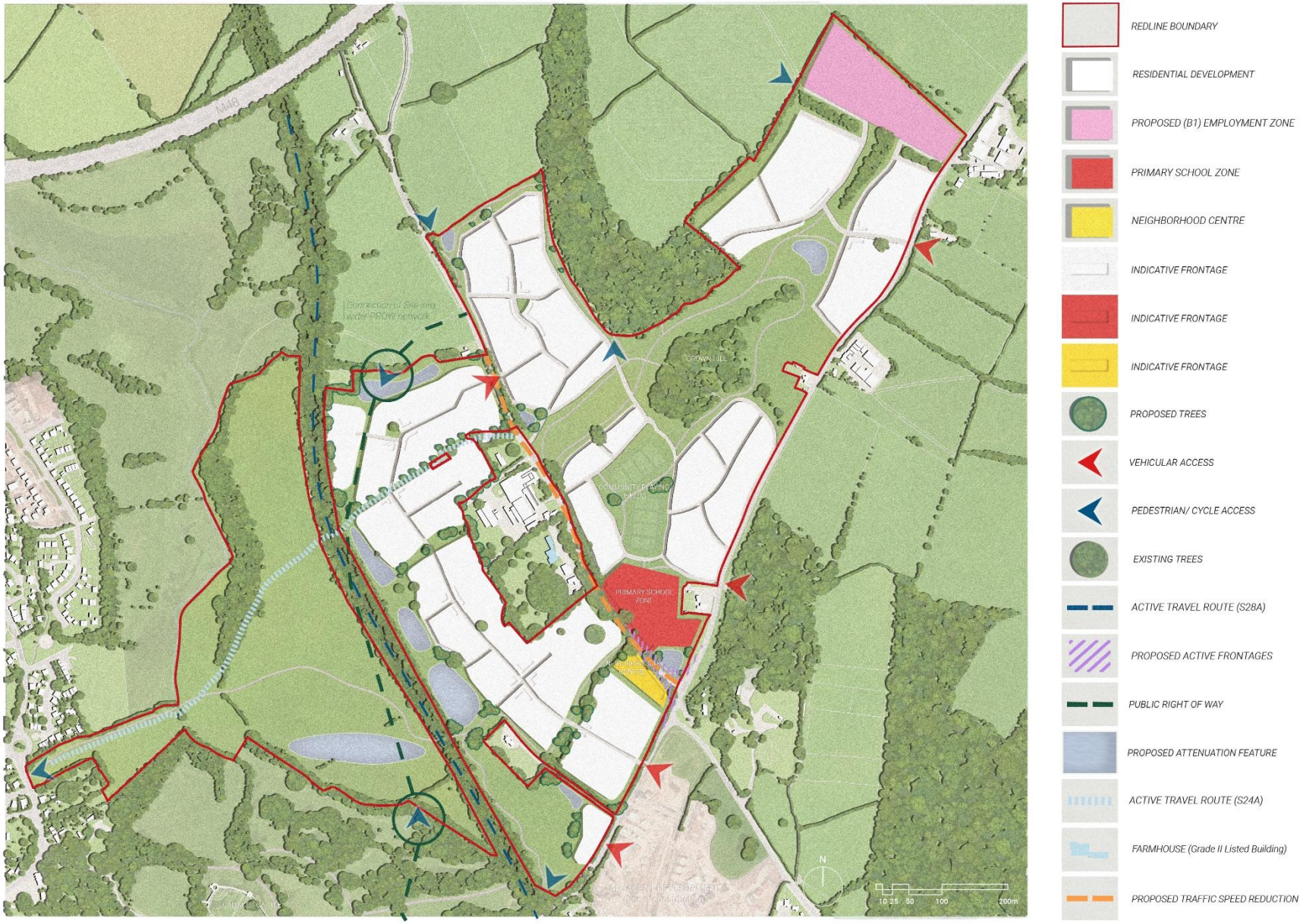
p) No built development will be permitted within the part of the site located in floodplain.

Other

q) Development must ensure adequate buffers are provided to take account of water mains intersecting the site.

A masterplan establishing key design and placemaking principles is being prepared and will be agreed with the Local Planning Authority prior to the determination of any planning application.

Indicative Masterplan: Land to the East of Caldicot/North of Portskewett



14.5 Land at Mounton Road, Chepstow

14.5.1 Land at Mounton Road is a sustainably located edge of settlement greenfield site comprising of approximately 12.8ha of agricultural/parkland/woodland, located to the western edge of Chepstow, west of the A466 (St Lawrence Road), north of the A48 and south of Mounton Road. Public Rights of Ways (PROWs) are located just outside the northern boundary of the site (off Mounton Road) and National Cycle Network 4 (NCN4) runs along the A466. Future Active Travel routes are proposed along Mounton Road,and the A466 and A48 highways.

14.5.2 The site benefits from less than 20-minute walking times to Chepstow town centre, railway station and other key services and facilities, as well as to Bulwark local centre. The site will be masterplanned to ensure active travel connections within and beyond the site to Chepstow's key services and facilities.

14.5.3 The site, although not located within a designated landscape, is in close proximity to the setting of the Wye Valley National Landscape (AONB), which is located approximately 100m to the northwest of the site. The site is outside Chepstow's Conservation Area, however, Mathern's Conservation Area boundary which includes Wyelands Historic Park and Gardens, is just to the south of the site boundary. The site is within the parkland setting of the Grade II Listed St Lawrence House, which is located just to the north boundary of the site, along with several other characterful residential properties to the north. There are groups of mature woodland and mature hedgerows which contain several important natural ecological habitats.The protection and preservation of these habitats is a key consideration in the development of the site.

14.5.4 Other key considerations include the site's proximity to Chepstow's air quality management area (AQMA) at Hardwick Hill and the potential effects of increased vehicular movement on the Highbeech Roundabout and surrounding transport network.

14.5.5 The site is 2.3km from the Severn Estuary European Marine site. The Habitats Regulations Assessment acknowledges that proposals could have a Likely Significant Effect on the EMS via Recreational Pressure and Functionally linked land which will need to be considered.

Policy HA3 - Land at Mounton Road, Chepstow
Allocated for a residential led mixed-use development

Development of the site should accord with the following parameters, placemaking principles and development requirements, which should be delivered in an appropriately phased manner and be formally tied to planning consents.

Site Area	Allocation Type	Number of Homes
12.8 ha	Strategic Mixed-Use: • Residential • Commercial uses such as Class C1 hotel and Class C2 residential care home	Approx No. of Homes: 146 Open Market Homes: 73 Affordable Homes: 73

In addition to the Placemaking Principles identified in Policy S8, the site must comply with the following criteria below:

Sustainable Communities

a) Creation of a high-quality well-connected extension, which responds to its edge of settlement location and to its gateway locality to Chepstow and Wye Valley National Landscape (AONB) setting.

b) A street hierarchy comprising a legible, permeable and connected network of street, footpaths and cycleways should be developed to inform the character of different parts of the site.

c) A focal tree-lined avenue should lead to the entrance of the community parkland from the A466 entrance point.

d) The non-residential element of the site to be delivered in line with an agreed phasing schedule.

e) The commercial uses of the development, which could include a hotel and care home are to be located in the north east focal/gateway point of the site.

f) An appropriate scale, massing, height and appearance of buildings, in particular the hotel and care-home, to respect the site's location, character and residential amenity impact;

g) Provision of a publicly accessible Community Parkland, with a parkland character that respects the setting of the Grade II listed St Lawrence House and creates opportunities for recreation and leisure.

h) Provision of an appropriate design response and interface between the eastern edge of the development and the A466 road corridor.

i) Provision of an appropriate design response for the proximity and transition to the green wedge and wider landscape to the south and west of development in terms of lighting and built form.

Green Infrastructure, Landscape and Nature Recovery

j) Existing western and northern boundary hedgerow and woodland shall be retained, buffered and protected. Trees with TPOs and other mature trees will be retained and protected within the Community Parkland and managed appropriately to maintain biodiversity value.

k) The site is within the 12.6km Core Recreational Catchment Zone for the Severn Estuary European Marine Site and will be considered for a financial contribution as part of the Mitigation Strategy for the site. Green space design must consider any emerging guidance for Suitable Alternate Natural Greenspace (SANG) to reduce recreational pressure on the features of the Estuary.

l) Provision of a lighting strategy that considers and mitigates for visual impact on landscape character and setting and minimises light spillage on to wildlife corridors and habitats.

Sustainable Travel and Highways

m) Provision of on and off-site highways infrastructure improvements as necessary, having regard to requirements arising from the Transport Assessment and including:
- A legal agreement for the proposed A466 primary access junction, footways, street lighting, crossing provision and the widening and improvement of the existing footway on the A466.
- A legal agreement for the construction of off-site pedestrian/cycling improvements, including connections to bus stops in both directions, the National Cycle route and Chepstow's community hospital.
- The layout in north west corner of the site will connect the proposal to the existing Public Right of Way 355/3/3 footpath.
- Land to be safeguarded for potential future improvements to the Highbeech Roundabout.
- Provision of a public transport link through the site, details of which to be agreed with MCC, including any necessary financial contributions to improve public transport services and nearby infrastructure.

Residential Amenity

n) The incorporation of satisfactory air quality measures for mitigating and/or reducing emissions. Development must not significantly worsen (either individually or cumulatively) any air pollution emissions in areas where pollution levels are close to their objective or limit value levels, nor result in a breach of an air quality objective or limit value.

A masterplan establishing key design and placemaking principles is being prepared and will be agreed with the Local Planning Authority prior to the determination of any planning application.

Indicative Masterplan: Land at Mounton Road, Chepstow

14.6 Leasbrook, Monmouth

14.6.1 The strategic site allocation at Leasbrook relates to a greenfield site comprising 12.5ha to the north-east of Monmouth. Leasbrook is a sustainably located edge of settlement site north of Dixton Road. The site is located adjacent to existing development at Dixton Close and Hereford Road, including Haberdashers' Monmouth School's playing pitches to the west, along with agricultural land to the east and north. The site is in close proximity to the Dixton Roundabout offering good links to locations further afield when public transport and use of the private car is necessary. Key facilities including Monmouth Town Centre, health care, schools and leisure centre are all within 20-minute walking distance of the site, making it very accessible via existing footways and active travel links.

14.6.2 The site offers opportunity to create an exemplar residential and GI-led development which is of importance due to the gateway location of the site on the entrance to Monmouth from the north. Density of development will vary across the site in response to its context given the sloping gradients within the site. Permeable street networks must be integrated within the site along with a clear street hierarchy and public space providing opportunity for focal points. A masterplan will be prepared and agreed for the site. Input from the Design Commission for Wales has helped shape the site's progression to date.

14.6.3 Key considerations for the development of the site include the need for an emergency access to be delivered due to the location of a very small part of the main site access being located in floodplain. A footpath link to Dixton Close and along Dixton Road will allow links to wider active travel links in Monmouth. Appropriate ecology mitigation is required due to the sites proximity to two Special Areas of Conservation (SACs). A green buffer is also required to minimise any potential landscape impact on the adjacent Dixton Conservation Area and the Lower Wye Valley Landscape of Historic Interest.

Policy HA4 - Land at Leasbrook, Monmouth

Allocated for residential development

Development of the site should accord with the following parameters, Placemaking Principles and Development Requirements, which should be delivered in an appropriately phased manner and be formally tied to planning consents.

Site Area	Allocation Type	Number of Homes
11ha	Residential	Approx No. of Homes: 270 Open Market Homes: 135 Affordable Homes: 135

In addition to the Placemaking Principles identified in Policy S8, the site must comply with the following criteria below:

Sustainable Communities

a) Creation of a high-quality and well-connected extension to Monmouth, which responds to its edge of settlement location.

Green Infrastructure, Landscape and Nature Recovery

b) Development of the site to consider existing topography, assets, features and contours of the site and include measures to integrate development appropriately while reducing visual impact. Less dense development should be provided on the northern and eastern edge of the site.

c) Maintain and enhance populations of protected and priority species.

d) The proposal must be accompanied by a lighting scheme. Dark corridors should be maintained and light spillage on to wildlife corridors minimised, with particular regard to the Greater Horseshoe Bat Juvenile Sustenance Zone and corridors used by bats.

e) A S.106 agreement must be signed and include the requirement for additional woodland buffer planting with well-designed public access to be provided on the eastern edge of the site (in the blue line of ownership) to protect the Greater Horseshoe Bat Juvenile Sustenance Zone and the wider landscape character due to the site's proximity to the Dixton Conservation Area and Lower Wye Valley Landscape of Historic Interest. This is required in addition to any on-site GI provision.

f) Protect, buffer and maintain existing TPO trees and significant trees by including within the Green Infrastructure provision and enhance by including new planting of native species of local provenance.

Sustainable Travel and Highways

g) Emergency vehicular access must be provided to connect to the A466 on Hereford Road to allow for a secondary means of access if required in an extreme flooding event.

h) Provision of on and off-site measures must be delivered to provide good quality, attractive, safe, legible and accessible pedestrian and cycle linkages both to and within the new development area. Key connections include a footpath link to Dixton Close and along Dixton Road which allows links to further active travel routes in Monmouth. Sufficient space within the site boundary must also be included to allow the future provision of active travel route MCC-M25A(DL)4A.

i) Provision of off-site highway infrastructure improvements as necessary, having regard to requirements arising from the Transport Assessment and including:

An agreement must be entered into with the Council for the facilitation of the construction of the development access;
The implementation of required off-site junction mitigation/ improvement measures as appropriate, details of which to be agreed with the Council;
Provision of a public transport link through the site if necessary, details of which to be agreed with the Council, including any necessary financial contributions to improve public transport services and nearby infrastructure.

Flood Risk and Sustainable Drainage Systems

j) Potential flood risk to, or as a consequence of, the development of the site must be suitably assessed in accordance with Welsh Government's Technical Advice Note (TAN) 15: Development and Flood Risk including consideration of flooding in extreme events on Dixton Road.

A masterplan establishing key design and placemaking principless is being prepared and will be agreed with the Local Planning Authority prior to the determination of any planning application.

Indicative Masterplan: Land at Leasbrook, Monmouth

Primary Settlements

14.7 Land at Penlanlas, Abergavenny

14.7.1 Land at Penlanlas is a greenfield site comprising approximately 6ha, located adjacent to the Bannau Brycheiniog National Park (BBNP) eastern boundary and the north-western fringe of Abergavenny. The site is bounded to the east and south by residential properties, by Old Hereford Road to the west and an electricity substation and other agricultural grassland to the north.

14.7.2 The site benefits from less than 25 walking time to Abergavenny town centre, with other key services and facilities, including schools, in closer proximity. Abergavenny Railway Station is just over 30 minutes' walk away and there will be opportunities to connect the site to Abergavenny's core with active travel links and promote the use of sustainable modes of travel. The site is also within the River Usk phosphorus sensitive catchment area.

Policy HA5 - Land at Penlanlas Farm, Abergavenny

Allocated for residential development

Development of the site should accord with the following parameters, Placemaking Principles and Development Requirements, which should be delivered in an appropriately phased manner and be formally tied to planning consents.

Site Area	Allocation Type	Total Homes
6.17ha	Residential	Approx No. of Homes: 100 Open Market Homes: 50 Affordable Homes: 50

In addition to the Placemaking Principles identified in Policy S8, the site must comply with the following:

Sustainable Communities

a) Incorporation of lower density development on the northern edge of the site and buffer zone to the north-west of the site to integrate it into the landscape.

b) Provision of allotments in the site.

Green Infrastructure, Landscape and Nature Recovery

c) Preserve or enhance the landscape setting of Bannau Brycheiniog National Park (BBNP) and have no adverse impact on the International Dark Skies Reserve designation.

d) Incorporate and enhance the existing Public Right of Way Footpath 91 running along the site's eastern boundary to include sufficient space to maintain existing and new hedgerows, green infrastructure assets, SuDS and public access.

e) Include opportunities for species rich grassland restoration and creation that will be managed appropriately.

Sustainable Travel and Highways

f) Provision of off-site highway infrastructure improvements as necessary, having regard to requirements arising from the Transport Assessment and including:
- An agreement with the Council to construct the development access and undertake off-site works to widen Old Hereford Road and necessary pedestrian/cycling improvements and reduce the speed limit on Old Hereford Road.
- Financial contributions to improve public transport services and nearby infrastructure.

g) Provision of good quality, safe, legible and accessible pedestrian and cycle linkages to key access points including the north-eastern corner of the site, south-eastern corner of the site and Old Hereford Road.

Residential Amenity

h) The incorporation of satisfactory air quality measures for mitigating and/or reducing emissions. Development must not significantly worsen (either individually or cumulatively) any air pollution emissions in areas where pollution levels are close to their objective or limit value levels, nor result in a breach of an air quality objective or limit value.

14.8 Land at Rockfield Road, Monmouth

14.8.1 Land at Rockfield Road is a greenfield site comprising 1.5ha, located on the north-western edge of Monmouth. This site is located adjacent to a residential site on Rockfield Road with extant planning permission for 70 homes and sits neatly within a gap between this permitted site to the east and existing residential development to the south and west. The northern boundary of the site comprises of a mature hedgerow with fields beyond. Retention of a green buffer on the edge of the site is required to minimise any potential landscape impact on the wider surroundings.

14.8.2 The site benefits from less than 15 minutes walking distance to the Monmouth District Centre on Rockfield Road providing a range of services including a convenience store. A primary school, the southern entrance of the Town Centre and a range of other facilities are located within 20 minutes walking distance. The adjacent public footpath must be linked into the site to provide connectivity.

Policy HA6 - Land at Rockfield Road, Monmouth
Allocated for residential development

Development of the site should accord with the following parameters, Placemaking Principles and Development Requirements, which should be delivered in an appropriately phased manner and be formally tied to planning consents.

Site Area	Allocation Type	Total Homes
1.5ha	Residential	Approx No. of Homes: 60 Open Market Homes: 30 Affordable Homes: 30

In addition to the Placemaking Principles identified in Policy S8, the site must comply with the following:

Green Infrastructure, Landscape and Nature Recovery

a) Include opportunities for grassland and hedgerow restoration, with appropriate buffers that ensure features can be managed appropriately for protected species including dormouse.

b) Provision of a lighting strategy that considers and mitigates for visual impact on landscape character and setting and minimises light spillage on to wildlife corridors and habitats, with particular reference to corridors used by horseshoe bats.

c) Ensure that PROW 375/127 is linked to development and has adequate space provided to accommodate active travel provision, public realm and hedgerows.

Sustainable Travel and Highways

d) Provision of access to the development and off-site highway improvements that are deemed necessary are subject to the approval and agreement of the Highway Authority.

e) Financial contributions are required to improve public transport services and nearby infrastructure.

14.9 Land at Drewen Farm, Monmouth

14.9.1 Land at Drewen Farm comprises 6.6ha of greenfield land and forms the remaining part of the adopted LDP Wonastow Road housing site in Monmouth known as Kingswood Gate. The site wraps around the Kingswood Gate site located to the south and west, with Watery Lane to the east and agricultural land to the north. The site is located within 15-minute walking distance of a school and the Monmouth District Centre on Rockfield Road, providing a range of services including a convenience store. The southern entrance of the Town Centre and a range of other facilities are located within 20-minute walking distance.

14.9.2 Key considerations of the site include the need for additional hedgerow and tree planting on the northern boundary to minimise any potential landscape impact on the wider surroundings. Retention of green buffers in and around the site are also essential to minimise any potential impact on both ecology and the wider landscape. Public footpath links to Watery Lane are essential.

Policy HA7 - Land at Drewen Farm, Monmouth

Allocated for residential development

Development of the site should accord with the following parameters, Placemaking Principles and Development Requirements, which should be delivered in an appropriately phased manner and be formally tied to planning consents.

Site Area	Allocation Type	Total Homes
6.6ha	Residential	Approx No. of Homes: 110 Open Market Homes: 55 Affordable Homes: 55

In addition to the Placemaking Principles identified in Policy S8, the site must comply with the following:

Sustainable Communities

a) Incorporation of lower densities along the boundaries of the open countryside responding to its edge of settlement location.

Green Infrastructure, Landscape and Nature Recovery

b) Existing boundary features to be enhanced with additional hedgerow and tree planting to mitigate for development and respond to its edge of settlement location.

c) Requirement of additional GI connectivity and buffers between sensitive habitats and built development, and areas adjacent to the Wonastow Field SINC.

Sustainable Travel and Highways

d) Provision of on and off-site measures to provide good quality, attractive, safe, legible and accessible pedestrian and cycle linkages both to and within the new development area. Key connections include PROW MCC-M17B, future PROW route MCC-M17A along Watery Lane and into the adjacent Kingswood Gate site allowing links to further active travel routes in Monmouth.

e) Provision of access to the development and off-site highway improvements that are deemed necessary are subject to the approval and agreement of the Highway Authority.

f) Financial contributions are required to improve public transport services and nearby infrastructure.

14.10 Tudor Road, Monmouth

14.10.1 The Tudor Road allocation comprises 2.05 hectares of greenfield land on the eastern side of Wyesham in Monmouth. The site benefits from access to number of facilities of less than 5 minutes walking distance including a primary school, convenience store/post office and open space. The Wyesham area also includes a supermarket which is within a 15-minute walk. The secondary school and leisure centre and other facilities in the Town Centre are located within a 25-minute walking distance on the other side of the River Wye. A new pedestrian and cycle crossing to connect Wyesham to the wider Monmouth area providing a safe and improved route has gained planning consent and is expected to be constructed within the Plan period.

14.10.2 A key consideration of the site is its location adjacent to the Wye Valley National Landscape (AONB). An appropriate green buffer is required along the boundary of the site to ensure the edge of the built development is softened, minimising any potential impact on this important designation.

Policy HA8 – Land at Tudor Road, Wyesham, Monmouth

Allocated for residential development

Development of the site should accord with the following parameters, Placemaking Principles and Development Requirements, which should be delivered in an appropriately phased manner and be formally tied to planning consents.

Site Area	Allocation Type	Total Homes
2.1ha	Residential	Approx No. of Homes: 50 Open Market Homes: 25 Affordable Homes: 25

In addition to the Placemaking Principles identified in Policy S8, the site must comply with the following:

Sustainable Communities

a) A mix of house types, tenure and size with lower densities on the edge of the site adjacent to the boundary of the Wye Valley National Landscape (AONB).

Green Infrastructure, Landscape and Nature Recovery

b) Development of the site to consider existing topography, assets, features and contours of the site and include measures to integrate development appropriately while reducing visual impact.

c) Protect, buffer and maintain existing trees and hedgerows, on site boundaries and central linear features, by including within the Green Infrastructure provision and enhance to provide both a buffer and enhanced green corridor.

d) Appropriate buffer planting to be included to enhance and protect linear features used by foraging and commuting bats associated with the Wye Valley and Forest of Dean Bat Sites SAC.

e) Provision of a lighting strategy that considers and mitigates for visual impact on landscape character and setting and minimises light spillage on to wildlife corridors and habitats, including corridors used by bats.

f) An area of public open space to be included within the site boundary in the south eastern corner of the site.

Sustainable Travel and Highways

g) Provision of on and off-site measures to provide good quality, attractive, safe, legible and accessible pedestrian and cycle linkages both to and within the new development area. Key connections include to the nearby active travel route MCC-M14A, which allows links to further active travel routes in Monmouth.

h) Provision of the development's primary access involving re-engineering of the existing Tudor Road junction, providing access to 7 – 19 Tudor Road, along with relocation of the associated residents' off-street parking.

i) Provision of off-site highway infrastructure improvements as necessary, having regard to requirements arising from the Transport Assessment and including:
- An agreement must be entered into with the Council for the construction of the development access;
- The implementation of required off-site junction mitigation/improvement measures as appropriate, details of which to be agreed with the Council;
- Financial contributions to improve public transport services and nearby infrastructure, details of which to be agreed with the Council.

Flood Risk and Sustainable Drainage Systems

j) A scheme for the management of overland flows from the land above the site will need to be considered and incorporated into the site drainage.

14.11 Land at Former MoD, Caerwent, Severnside

14.11.1 The Former Ministry of Defence (MoD) site in Caerwent is a brownfield site comprising of 4.2ha of former MoD land, located to the north eastern edge of Caerwent, north of the A48 highway. The site will provide a sustainable affordable-led, mixed-use (residential and B1 employment) development where there are opportunities to co-locate homes and commercial uses.

14.11.2 The site, located within Severnside, benefits from an approximate 10-minute walking time to Caerwent's key services and facilities, which includes a public house, post office and farm shop. There are opportunities to connect and link the site to sustainable travel, including the National Cycle Network Route (NCN) and bus stops along the A48.

14.11.3 There is an existing large derelict red brick building as well as several smaller utilitarian buildings within the site, and hardstanding areas. The site which has been unoccupied for several years has been neglected and as such has regenerating scrubland/overgrown vegetation within the site and along the boundary with the A48. Protected and priority species have been identified within the site.

14.11.4 There are two existing residential properties adjoining the south east and south west boundary of the site. Residential amenity impact to these properties will be required to be considered with the masterplan design.

14.11.5 The site is 3km from the Severn Estuary European Marine site. The Habitats Regulations Assessment acknowledges that proposals could have a Likely Significant Effect on the EMS via Recreational Pressure and Functionally linked land which will need to be considered.

Policy HA9 - Land at Former MOD, Caerwent

Allocated for a mixed-use residential scheme

Development of the site should accord with the following parameters, placemaking principles and development requirements, which should be delivered in an appropriately phased manner and be formally tied to planning consents.

Site Area	Allocation Type	Number of Homes
4.2ha	Mixed-Use Residential Commercial B1	Approx No. of Homes: 40 Open Market Homes: 20 Affordable Homes: 20

In addition to the Placemaking Principles identified in Policy S8, the site must comply with the following:

Sustainable Communities

a) Provision of a mixed-use development of residential and commercial B1 uses with a minimum of 1ha for B1 employment land.

b) The non-residential element of the site to be delivered in line with an agreed phasing schedule.

c) Any proposed new commercial buildings must be of an appropriate scale, massing and height to respect the site's character and edge of settlement setting and residential amenity impact.

Green Infrastructure, Landscape and Nature Recovery

d) Maintain and enhance populations of protected and priority species including reptiles, dormouse, and the lesser horseshoe maternity roost through retention of existing habitat and appropriate buffer planting.

e) Appropriate buffer and boundary treatments to the north of the site must be considered.

f) Provision of a lighting strategy that considers and mitigates for visual impact on landscape character and setting and minimises light spillage on to wildlife corridors and habitats, including corridors used by bats and dormice present on the site.

g) The site is within the 12.6km Core Recreational Catchment Zone for the Severn Estuary European Marine Site and will be considered for a financial contribution as part of the Mitigation Strategy for the site. Green space design must consider any emerging guidance for Suitable Alternate Natural Greenspace (SANG) to reduce recreational pressure on the features of the estuary.

Sustainable Travel and Highways

h) Provision of off-site highway infrastructure improvements as necessary, having regard to requirements arising from the Transport Assessment and including:
- An agreement for the proposed A48 Junction, footways, street lighting, crossing provision and associated highway improvements.
- An agreement for the construction of safe off-site pedestrian and cycling crossing of the A48, and to allow for connection to the NCN 4.

Secondary Settlements

14.12 Land South of Monmouth Road, Raglan

14.12.1 Land south of Monmouth Road, Raglan is a greenfield site comprising approximately 7.6ha of agricultural land, located to the south-east of Raglan. The site borders Raglan Conservation Area located to the south of Raglan Castle. The site benefits from less than 10 minutes walking time to Raglan's centre, with other key services and facilities including a school in closer proximity.

Policy HA10 - Land South of Monmouth Road, Raglan
Allocated for residential development

Development of the site should accord with the following parameters, Placemaking Principles and Development Requirements, which should be delivered in an appropriately phased manner and be formally tied to planning consents.

Site Area	Allocation Type	Total Homes
4.5 ha	Residential	Approx No. of Homes: 54 Open Market Homes: 27 Affordable Homes: 27

In addition to the Placemaking Principles identified in Policy S8, the site must comply with the following:

Sustainable Communities

a) Development should not have a significant adverse impact on the settings of Raglan Castle Scheduled Ancient Monument and Registered Park and Garden.

b) The site's location bordering Raglan Conservation Area and positioning alongside the main access into the Conservation Area should be reflected in the site's masterplanning.

c) Building form and type should be varied with a mix of positions to help create space between the buildings and emphasise the linkages to the wider landscape.

d) Building heights should be one or two storeys to ensure effective integration into the landscape.

Green Infrastructure, Landscape and Nature Recovery

e) Protect, buffer and maintain existing TPO trees and other trees and hedgerows by including within the Green Infrastructure provision and enhance by include new planting of native species of local provenance.

f) Include opportunities for grassland improvement and habitat suitable for breeding great crested newts.

Sustainable Travel and Highways

g) Provision of off-site highway infrastructure improvements as necessary, having regard to requirements arising from the Transport Assessment and including:

- An agreement with the Council for the proposed Monmouth Road junction, footways, street lighting, crossing provision and the widening and improvement of the existing footway on Monmouth Road.
- Primary access arrangements on to Monmouth Road.
- An emergency secondary access on to Station Road.
- Financial contributions to carry out any necessary improvements to the local and strategic highway network.
- Financial contributions to improve public transport services and nearby infrastructure.
- Provision of good quality, safe, legible and accessible pedestrian and cycle linkages to key access points including a footpath link onto Station Road linking to the primary school and playing fields to the south and the village centre via Chepstow Road.

14.13 Land East of Burrium Gate, Usk

14.13.1 Land east of Burrium Gate is a greenfield site comprising of 2.9 ha of agricultural land, located at the eastern edge of Usk, north of Monmouth Road.

14.13.2 The site benefits from an approximate 10-minute walking time to Usk Primary School and a 15-minute walk to Usk town centre (Twyn Square) with key services and facilities. There are opportunities to link the site to sustainable travel facilities including bus stops along Monmouth Road and a planned active travel route along Monmouth Road.

14.13.3 Key considerations with regard to the development of the site include its proximity to Usk's air quality management area (AQMA), the site's impact on overland drainage flow and its layout

and design upon the setting of Usk. The site is also within the River Usk phosphorus sensitive catchment area.

Policy HA11 - Land-east of Burrium Gate, Usk

Allocated for residential development

Development of the site should accord with the following parameters, placemaking principles and development requirements, which should be delivered in an appropriately phased manner and be formally tied to planning consents.

Site Area	Allocation Type	Number of Homes
2.6 ha	Residential	Approx No. of Homes: 40 Open Market Homes: 20 Affordable Homes: 20

In addition to the placemaking principles identified in Policy S8, the site must comply with the following:

Green Infrastructure, Landscape and Nature Recovery

a) The development layout will respond to its topography and be maintained with a development ridgeline no more than 40m above Ordnance Datum (AOD), in order to protect the landscape character of Usk.

b) The boundary hedge to the east and south of the site will be retained and enhanced, allowing for site access where appropriate.

c) An appropriate buffer to SINC sites will be included and opportunities to create and enhance priority grassland habitat will be provided as part of the development.

Sustainable Travel and Highways

d) Provision of off-site highway infrastructure improvements as necessary, having regard to requirements arising from the Transport Assessment and including:
- An agreement for the proposed Monmouth Road junction, footways, street lighting, crossing provision and the widening and improvement of the existing footway on Monmouth Road.
- Provision of good quality, safe, legible and accessible pedestrian and cycle linkages.
- Financial contributions to improve public transport services and nearby infrastructure.
- Implementation of a traffic regulation order to extend the speed limit on Monmouth Road.

Residential amenity

e) The incorporation of satisfactory air quality measures for mitigating and/or reducing emissions within Usk's AQMA. Development must not significantly

worsen (either individually or cumulatively) any air pollution emissions in areas where pollution levels are close to their objective or limit value levels, nor result in a breach of an air quality objective or limit value.

Flood Risk and Sustainable Drainage Systems

f) A scheme for the management of overland flows from adjacent land will need to be included to ensure existing overland flood risk has been accommodated within the layout of the site.

14.14 Land West of Trem yr Ysgol, Penperlleni

14.14.1 Land west of Trem yr Ysgol is a greenfield site comprising of 3.4 ha of agricultural land located to the south-western edge of Penperlleni, within the back-drop of the Bannau Brycheiniog National Park (BBNP). Vehicular access is proposed to connect to the existing Trem yr Ysgol highway, part of the recently built residential development.

14.14.2 The site benefits from an approximate 5-minute walking time to Goytre Fawr Primary School and an approximate 10-minute walk to key services and facilities, such as the local public house and convenience store. There are opportunities to connect and link the site to sustainable travel, including existing bus stops along the adjacent A4042.

14.14.3 The site is bounded by the Ffynnon Ddu watercourse along the eastern and southern boundaries and to the north west by the A4042 Trunk Road. The site contains several important natural ecological habitats. Towards the south west there is an existing wet woodland associated with the watercourse along with grassy marshland. There are also several mature trees within the site, including a veteran Oak Tree.

14.14.4 A DCWW mains pipe runs through the northern section of the site, where there are access easements, prohibiting development within a buffer of the pipe. A community orchard and public open space provision is proposed in this area of the site.

Policy HA12 - Land west of Trem yr Ysgol, Penperlleni
Allocated for a residential development

Development of the site should accord with the following parameters, placemaking principles and development requirements, which should be delivered in an appropriately phased manner and be formally tied to planning consents.

Site Area	Allocation Type	Total Homes
3.4 ha	Residential	Approx No. of Homes: 42 Open Market Homes: 21 Affordable Homes: 21

In addition to the placemaking principles identified in Policy S8, the site must comply with the following:

Green Infrastructure, Landscape and Nature Recovery

a) The site design will identify and respect any key views to the wider Bannau Brycheiniog National Park (BBNP).

b) Protect, buffer, enhance and maintain existing TPO trees and other veteran and over-mature trees and hedgerows and include within the Green Infrastructure provision new planting of native species of local provenance.

c) An appropriate landscape buffer will be provided to the eastern stream corridor.

Sustainable Travel and Highways

d) Provision of off-site highway infrastructure improvements as necessary, having regard to requirements arising from the Transport Assessment and including:
- An agreement to extend and re-engineer Trem yr Ysgol to provide pedestrian and primary vehicular access;
- Provision of a link through the site to allow for pedestrian access to the southbound bus stop.

Main Rural Settlements

14.15 Land adjacent to Piercefield Public House, St Arvans

14.15.1 Land adjacent to Piercefield Public House is a 1.1ha greenfield site, located to the southern edge of St Arvans, west of the A466, within the Wye Valley National Landscape (AONB).

14.15.2 The site benefits from under 5-minute walking times to St Arvans' key services and facilities, such as the Piercefield Public House, village store and children's nursery. There are opportunities to connect and link the site to sustainable travel, including the National Cycle Network(NCN) and bus stops along the adjacent A466 and to the adjacent PROW along the south east boundary of the site.

14.15.3 The site is 3km from the Severn Estuary European Marine site. The Habitats Regulations Assessment acknowledges that proposals could have a Likely Significant Effect on the EMS via Recreational Pressure and Functionally linked land which will need to be considered.

14.15.4 The site is within the Otter Hole Regionally Important Geodiversity Sites (RIGS).

Policy HA13 - Land adjacent to Piercefield Public House, St Arvans
Allocated for residential development

Development of the site should accord with the following parameters, placemaking principles and development requirements, which should be delivered in an appropriately phased manner and be formally tied to planning consents.

Site Area	Allocation Type	Total Homes
1.1 ha	Residential	Approx No. of Homes: 16 Open Market Homes: 8

		Affordable Homes: 8

In addition to the placemaking principles identified in Policy S8, the site must comply with the following:

Green Infrastructure, Landscape and Nature Recovery

a) The site design will identify and respect any key views to the wider Wye Valley National Landscape (AONB) setting.

b) The site is within the 12.6km Core Recreational Catchment Zone for the Severn Estuary European Marine Site and will be considered for a financial contribution as part of the Mitigation Strategy for the site. Green space design must consider any emerging guidance for Suitable Alternate Natural Greenspace (SANG) to reduce recreational pressure on the features of the estuary.

c) Provision of a lighting strategy that considers and mitigates for visual impact on landscape character and setting and minimises light spillage on to wildlife corridors and habitats, including corridors used by bats.

Sustainable Travel and Highways

d) Provision of off-site highway infrastructure improvements as necessary, having regard to requirements arising from the Transport Assessment and including:
- An agreement for proposed A466 road junction, footways, street lighting, crossing provision, connection to the cycle network and the widening and improvement of the existing footway on the A466.

e) The layout will connect the proposal to the existing Public Right of Way 379/1/2 footpath running along the site's south eastern boundary.

14.16 Land at Churchfields, Devauden

14.16.1 Land at Churchfields is a greenfield site, comprising of 1.4ha of agricultural land located to the western edge of Devauden. The site is located west of Churchfields existing residential homes, and vehicle access is proposed to connect to the existing Churchfields Cul-de-sac highway. The site is located within the Wye Valley National Landscape (AONB).

14.16.2 The site benefits from approximately 5-minute walking times to Devauden's community services and facilities, such as the local store and village community hall. There are opportunities to connect and link the site to sustainable travel, including the existing bus stops along the adjacent B4293 and the PROW which runs immediately adjacent to the western boundary of the site.

Policy HA14 - Land at Churchfields, Devauden

Allocated for residential development

Development of the site should accord with the following parameters, placemaking principles and development requirements, which should be delivered in an appropriately phased manner and be formally tied to planning consents.

Site Area	Allocation Type	Total Homes
1 ha	Residential	Approx No. of Homes: 20 Open Market Homes: 10 Affordable Homes: 10

In addition to the placemaking principles identified in Policy S8, the site must comply with the following:

Green Infrastructure, Landscape and Nature Recovery

a) The site design will identify and respect any key views to the wider Wye Valley National Landscape (AONB) setting.

b) Development of the site to consider existing topography, assets, features and contours of the site and include measures to integrate development appropriately while reducing visual impact.

c) The site is within the 12.6km Core Recreational Catchment Zone for the Severn Estuary European Marine Site and will be considered for a financial contribution as part of the Mitigation Strategy for the site. Green space design must consider any emerging guidance for Suitable Alternate Natural Greenspace (SANG) to reduce recreational pressure on the features of the estuary.

Sustainable Travel and Highways

d) Provision of off-site highway infrastructure improvements as necessary, having regard to requirements arising from the Transport Assessment and including:
- An agreement to extend and re-engineer Churchfields to provide pedestrian improvements (to nearby bus stops) and primary vehicular access;

e) The layout will connect the proposal to the existing Public Right of Way 357/64/1 footpath running along the site's western boundary.

14.17 Land East of Little Mill

14.17.1 The site comprises 4.1 hectares on the eastern side of Little Mill, north of and adjacent to the A472. The site is in close proximity to a proposed Future Active Travel route for walking and cycling and is also close to a number of Public Rights of Way. The site is served by bus route 63 (Cwmbran-Pontypool-Usk-Chepstow), with both eastbound and westbound bus stops along the A472.

14.17.2 The site is within the Usk Glacier Terminal Moraine Regionally Important Geodiversity Site (RIGS).

Policy HA15 - Land east of Little Mill

Allocated for residential development

Development of the site should accord with the following parameters, placemaking principles and development requirements, which should be delivered in an appropriately phased manner and be formally tied to planning consents.

Site Area	Allocation Type	Total Homes
1.68ha	Residential	Total Homes: 20 Open Market Homes: 10 Affordable Homes: 10

In addition to the Placemaking Principles identified in Policy S8, the site must comply with the following:

Green Infrastructure, Landscape and Nature Recovery

a) Sensitive lighting of the site and associated infrastructure will be required due to the presence of a high conservation value lesser horseshoe bat roost to the south of the site.

Sustainable Travel and Highways

b) Provision of off-site highway infrastructure improvements as necessary, having regard to requirements arising from the Transport Assessment and including:
- Provision of vehicular access via Cae Melin
- Provision of a 2.0 metre wide footway on eastern side of Cae Melin linking to existing footways on the A472.

Flood Risk and Sustainable Drainage Systems

c) A scheme for the management of overland flows from adjacent land will need to be included to ensure the potential flood risk from the land above the site has been accommodated within the layout of the site.

14.18 Land North of Little Mill

14.18.1 Land north of Little Mill is a greenfield site situated at the northern limits of the village. Residential properties border the southern edge of the site, with a railway line to the north-west and open grazing land to the north and east. A PROW runs along the site's eastern boundary, and it is served by bus route 63 (Cwmbran-Pontypool-Usk-Chepstow), with both eastbound and westbound bus stops along the A472. Allocation of the site is a continuation of the Adopted LDP allocation.

Policy HA16 - Land North of Little Mill

Allocated for residential development

Development of the site should accord with the following parameters, placemaking principles and development requirements, which should be delivered in an appropriately phased manner and be formally tied to planning consents.

Site Area	Allocation Type	Total Homes
0.87ha	Residential	Approx No. of Homes: 15 Open Market Homes: 7 Affordable Homes: 8

In addition to the Placemaking Principles identified in Policy S8, the site must comply with the following:

Green Infrastructure, Landscape and Nature Recovery

a) Protect buffer and maintain existing mature trees within the Green Infrastructure provision of the site.

b) Provision of a lighting strategy that considers and mitigates for visual impact on landscape character and setting and minimises light spillage on to wildlife corridors and habitats, including corridors used by bats.

Sustainable Travel and Highways

c) Off-site highway infrastructure improvements as necessary including vehicular access through the extension of Ty Gwyn Road.

d) Provision of good quality, safe, legible and accessible pedestrian and cycle linkages to key access points including public transport stops, the public rights of way network and key services including those located along Berthon Road.

Residential Amenity

e) The incorporation of appropriate noise and vibration mitigation measures reflecting the site's proximity to the railway line on its north-western boundary.

Flood Risk and Sustainable Drainage Systems

f) Incorporation of surface water drainage solutions to the south eastern corner of the site.

14.19 Llanellen Court

14.19.1 Land adjacent to Llanellen Court Farm is a greenfield site comprising of agricultural land, located in the rural village of Llanellen, south of Abergavenny. The site is in close proximity to a number of Public Rights of Way, including National Cycling Network (NCN) route 49, which relates to a proposed Active Travel route along the Monmouthshire Brecon Canal to the west. The site is served by both northbound and southbound bus stops along the A4042.

Policy HA17 - Land adjacent to Llanellen Court Farm, Llanellen
Allocated for residential development

Development of the site should accord with the following parameters, placemaking principles and development requirements, which should be delivered in an appropriately phased manner and be formally tied to planning consents.

Site Area	Allocation Type	Total Homes
1.56ha	Residential	Approx No. of Homes: 26 Open Market Homes: 13 Affordable Homes: 13

In addition to the Placemaking Principles identified in Policy S8, the site must comply with the following:

Green Infrastructure, Landscape and Nature Recovery

a) Protect, buffer and maintain existing TPO trees and other trees and hedgerows by including within the Green Infrastructure provision and enhance with new planting of native species of local provenance.

Sustainable Travel and Highways

b) An agreement must be entered into with the Council for the implementation of required off-site works and improvement measures including:
- The adoption of the existing development access.
- The construction of the proposed off-site pedestrian/cycling improvements for safe access to bus stops on the A4042 in both directions.
- The creation of accessible pedestrian access to the bus stop on Elm Drive, a shared-use path to link to the Monmouthshire and Brecon Canal and exploration of better links to the village centre other than the PROW.
- The provision of access improvements where necessary.

14.20 Land west of Redd Landes, Shirenewton

14.20.1 Land west of Redd Landes is located on the western edge of Shirenewton. The site is located opposite the recreation ground, play area and recreation hall and offers links to wider public rights of way that connect to the primary school and other parts of the village. Additional footways to improve these connections are required as part of the development. A key consideration of the site is the need for additional hedgerow and tree planting to minimise any potential landscape impact on the wider surroundings.

14.20.2 The site is 6km from the Severn Estuary European Marine site. The Habitats Regulations Assessment acknowledges that proposals could have a Likely Significant Effect on the EMS via Recreational Pressure and Functionally linked land which will need to be considered.

Policy HA18 - Land west of Redd Landes, Shirenewton

Allocated for residential development

Development of the site should accord with the following parameters, placemaking principles and development requirements, which should be delivered in an appropriately phased manner and be formally tied to planning consents.

Site Area	Allocation Type	Total Homes
1.76ha	Residential	Approx No. of Homes: 26 Open Market Homes: 13 Affordable Homes: 13

In addition to the Placemaking Principles identified in Policy S8, the site must comply with the following:

Sustainable Communities

a) Inclusion of an active frontage along the main road to foster connection with the wider settlement.

Green Infrastructure, Landscape and Nature Recovery

b) Existing boundary features to be enhanced with additional hedgerow and tree planting to boundaries to mitigate for development and respond to its edge of settlement location.

c) The site is within the 12.6km Core Recreational Catchment Zone for the Severn Estuary European Marine Site and will be considered for a financial contribution as part of the Mitigation Strategy for the site. Green space design must consider any emerging guidance for Suitable Alternate Natural Greenspace (SANG) to reduce recreational pressure on the features of the estuary.

d) Provision of a lighting strategy that considers and mitigates for visual impact on landscape character and setting and minimises light spillage on to wildlife corridors and habitats.

Sustainable Travel and Highways

e) Provision of on and off-site measures to provide good quality, attractive, safe, legible and accessible pedestrian and cycle linkages both to and within the new development area. Key connections include a footpath link on the eastern part of the site to the road frontage footway allowing for ease of access to the recreation hall and grounds, along with a new footway link to the north of the site connecting to the existing Public Right of Way 380/42/1.

f) Provision of off-site highway infrastructure improvements as necessary, having regard to requirements arising from the Transport Assessment and including:

- An agreement must be entered into with the Council for facilitation of the construction of the development access;

- A 2 metre footway on the northern side of Route R122 Earlswood Road over the site's frontage linking to the existing footway at Redd Landes;
- Relocation of the existing 20mph and 40mph speed limits and measures to promote the change in speed limit and environment, the location of which to be agreed with the Council.

Other

g) Protection measures in the form of a diversion or easement width may be required to ensure the protection of any water mains traversing the site.

Gypsy & Travellers

15. Gypsy and Travellers

Strategic Policy S9 – Gypsy and Travellers

Land will be made available at Bradbury Farm, Crick for 7 pitches to accommodate unmet Gypsy and Traveller accommodation needs identified in the latest Gypsy and Traveller Accommodation Assessment.

15.1.1 Local Authorities are required to assess Gypsy and Travellers needs under the Housing (Wales) Act 2014 and prepare an update every five years. An updated Gypsy and Travellers Accommodation Assessment (GTAA) for Monmouthshire has been prepared and was agreed by Welsh Government in June 2024. PPW requires Local Authorities in their local development plans to allocate sites to meet the identified need in the GTAA and include policies for the provision of Gypsy, Traveller and Show People sites.

15.1.2 The updated GTAA identifies a need for nine residential pitches between the period 2020 – 2025 and a further four pitches for the remaining Plan period of 2026 – 2033, giving a total need of thirteen pitches until the end of Plan period. Of the thirteen pitches needed, two pitches have been granted planning permission for a family that was part of the GGTA. This reduced the pitch requirement to 11. The decision by the Planning Committee on 16th July 2024 to approve a further four pitches at Llancayo, reduces the overall pitch requirement further to seven. To address the remaining need over the Plan period, the site at Bradbury Farm, Crick is allocated for seven pitches.

15.1.3 The GTAA update does not identify a need for a transit pitch[38]. In terms of transit sites, it is considered that these would be best considered on a regional basis, requiring collaboration with neighbouring local authorities. Welsh Government are in the process of commissioning an all-Wales mapping study on Gypsy and Traveller Transit Site provision, with publication anticipated in late 2024. This will inform a regional study to be commissioned by SEWSPG on behalf of the ten Local Planning Authorities in south east Wales, to look at supply and demand for Gypsy and Traveller Transit accommodation across the region with a view to recommending suitable broad areas for future accommodation to meet regional need, based on known transit patterns and routes.

15.2 Gypsy, Traveller and Travelling Showpeople Sites

[38] Welsh Government Circular 005/2018 – Planning for Gypsy, Traveller and Showpeople (June 2018) notes a Transit site is a site where occupiers have agreement to stay for periods of less than three months as set out in The Mobile Homes (Wales) Act 2013.

Policy GT1 – Gypsy, Traveller and Showpeople Sites

Proposals for Gypsy and Traveller and Travelling Showpeople will be permitted provided that:

a) the site is within or adjacent to a settlement boundary. Sites in the countryside away from existing settlements will be considered where there is a lack of suitable sustainable locations for sites within or adjacent to existing settlement boundaries, in accordance with Circular 005/2018;

b) the site has a safe and convenient access to the highway network and will not cause traffic congestion or safety problems;

c) the site is of a suitable size to allow for the planned number of caravans, amenity blocks, a play area (for children on sites housing multiple families), the access road and include sufficient space for the parking and safe circulation of all vehicles associated with occupiers within the site curtilage;

d) the site does not occupy a prominent location and is consistent with RLDP policies for protecting and enhancing character and distinctiveness of the landscape and environment. Where necessary the proposal will include mitigating measures to reduce the impact, and assimilate the proposal into its surroundings e.g. screening and landscaping;

e) the site is not within areas at high risk of flooding and proximity to uses with potential sources of pollution or emissions;

f) the site is of an appropriate scale to its location and does not have an unacceptable impact on the amenities of neighbouring land uses;

g) it is served, or can be served, by adequate on-site services for water supply, power, drainage, sewage disposal and waste disposal (storage and collection), and for Travelling Showpeople that there is a level area for outdoor storage and maintenance of equipment.

15.2.1 In addition to the permanent site(s) identified in Policy S9, it is important to include a detailed criteria-based policy in order to meet any future or unexpected need. Site proposals must be in accordance with advice in Welsh Government Circular 005/2018: Planning for Gypsy, Traveller and Showpeople Sites, which will be a material consideration as appropriate in the determination of any planning applications. In addition, sites being developed by a public body, such as a Local Authority, should be designed in accordance with the Welsh Government Guidance: Designing Gypsy and Traveller Sites. Policy GT1 provides the framework for assessing proposals for Gypsy, Traveller and Travelling Showpeople sites, whether for permanent, transit or emergency use.

S9 - Links to Wider Policy Framework	
RLDP Objectives	Objective 9 – Demography Objective 10 – Housing Objective 11 – Placemaking

	Objective 12 – Communities Objective 13 – Rural Communities
Future Wales: The National Plan 2040 (WG, February 2021)	Policy 7 – Delivering Affordable Homes
Planning Policy Wales Edition 12 (WG, February 2024)	Active and Social Places Theme (Chapter 4) - Gypsies and Travellers
Well-being of Future Generations Act (WBFGA) (WG, 2015)	A more equal Wales A Wales of Cohesive Communities A Wales of vibrant culture and thriving Welsh Language
Gwent PSB Well-being Plan (August 2023)	• Take action to reduce the cost-of-living crisis in the long term. • Take action to address inequities, particularly in relation to health, through the framework of the Marmot Principles. • Enable and support people, neighbourhoods, and communities to be resilient, connected, thriving and safe.
Taking Monmouthshire Forward - Community and Corporate Plan 2022 - 2028 (April 2023)	This policy supports the Community and Corporate Plan objectives of ensuring Monmouthshire is a: • fair place to live where the effects of inequality and poverty have been reduced; • safe place to live where people have a home they feel secure in.
Key Evidence	Gypsy and Travellers Accommodation Assessment – May 2016 Gypsy and Travellers Accommodation Assessment – 2020 – 2025 (January 2021) – Welsh Government approval June 2024 Housing (Wales) Act 2014 Welsh Government Circular 005/2018: Planning for Gypsy, Traveller and Showpeople Sites TAN 6: Planning Sustainable Rural Communities (2010) Gypsy and Travellers Background Paper – October 2024

Employment & Economy

16. Employment Sites Provision

Strategic Policy S10 – Employment Sites Provision

Provision is made for 57ha of employment land to meet a minimum requirement of 38ha of land on a suitable range and choice of sites for industrial and business development (Use Classes B1, B2, B8) in accordance with the Plan's Spatial Strategy.

Existing employment land and premises that continue to be required for employment purposes will be protected from alternative forms of development.

Development proposals within settlement boundaries that seek to deliver the Council's vision for sustainable economic growth will be permitted, particularly where they reflect the aims of the Economy, Employment & Skills Strategy. All proposals will be subject to detailed planning considerations, including the protection of the natural and built environment.

16.1.1 Monmouthshire's economic profile is characterised by low unemployment levels, but a high economic inactivity rate, reflecting its increasing ageing population and shrinking working age population. Levels of out-commuting and the distances travelled have also been high historically. Combined, these factors are impacting on employment growth within Monmouthshire and the social sustainability of our communities. The RLDP seeks to address these issues by promoting a growth level and spatial strategy that will promote higher employment growth, supporting greater labour force retention and achieve a reduction in the net out-flow of workers. The RLDP provides the planning policy framework to enable the provision of up to 6,240 jobs over the Plan period (416 jobs per annum). This level of job

growth aligns with the projected population and housing growth and takes account of adjustments to household membership rates for key younger age groups and a reduced level of commuting by retaining more of the resident workforce.

16.1.2 Securing local economic growth and prosperity is a key aim of the Plan and will be achieved through a range of mechanisms and sectors. Delivering on the growth ambition will require more than simply allocating land in the RLDP; the Economy, Employment and Skills Strategy (EESS) sets the Council's direction of travel and action plan focussed around four key priority themes that have emerged from the Corporate and Community Plan.

Figure 3

Economy, Employment and Skills Strategy – key priority themes and objectives	
Place: A vibrant, greener Monmouthshire	**People:** A fairer, more successful Monmouthshire
• Promote the distinctive diversity of Monmouthshire as a county of opportunity. • Support the vitality of our town centres. • Support the transition towards net zero and protect our environment. • Support rural diversification. • Enhance the experience for visitors and deliver sustainable growth in our tourism economy.	• Support a balanced change in the demographic profile of our county. • Support the creation of 6,240 sustainable job opportunities. • Equip people with skills and qualifications to enter employment, enable employment progression and explore a Skills Centre in Monmouthshire. • Collaborate with comprehensive schools, further and higher education partners to enhance access and networks.
Enterprise: A thriving, ambitious Monmouthshire	**Infrastructure:** A well connected Monmouthshire attracting business investment
• Support the sustainable growth of existing businesses including our larger businesses. • Finding our place in relation to regional growth opportunities • Increase uptake of support for people wishing to start or grow a business. • Continue to foster a strong entrepreneurial culture. • Encourage innovation and clustering in sectors. • Make public procurement spend more accessible. • Foster a thriving local food economy.	• Inform the use and distribution of employment land and premises. • Explore the Council's role in the delivery of employment floor space. • Support improvements in digital connectivity. • Support improvements to key public transport services. • Attract investment from larger high value enterprises.

16.1.3 The RLDP has a key role supporting the Council's vision for economic growth and will be one of the main enablers in delivering sustainable economic growth and increasing employment opportunities in existing and emerging sectors. The EESS recognises that the RLDP is a key mechanism for achieving many of the objectives noted above. This ranges from a supportive policy framework to facilitate economic growth in a range of sectors to identifying sufficient land to enable the growth of the B Use Class Sector.

16.1.4 Monmouthshire is geographically well connected, located in a key strategic location that benefits from good links to Cardiff, Bristol and the Midlands. With the removal of the Severn Bridge tolls, Monmouthshire's relationship with the West of England Combined Authority (WECA), the Bristol City Region, Forest of Dean and South Gloucestershire is also expected to strengthen and enhance the County's economic role in the region. Monmouthshire is well located to benefit from initiatives such as the Cardiff Capital Region City Deal, Great Western Cities, the Marches Forward Partnership and the Western Power House, which aim to drive economic growth through regional collaboration.

16.1.5 As noted in the Development Plans Manual (March 2020), the aim of a LDP strategy is to achieve a balance between homes and jobs thereby reducing the need for commuting. The Manual recognises that the scale of economic growth to be delivered in a plan will be strongly influenced by factors including the available labour force, skills, net migration levels and commuting patterns. While these factors remain relevant and are key objectives of the Plan, it is becoming widely accepted that the fundamental shift in working practices experienced as a legacy of the Covid-19 pandemic, with a significant increase in people working from home/remotely, has made it less important where some jobs are located as employees no longer need to commute for work in many cases. This has provided the opportunity for many people to live and work in the same location via a new remote working approach and aligns with Welsh Government's 'Smarter Working: a Remote Working Strategy for Wales. This sets out Welsh Government's approach to achieving 30% of the Welsh workforce working at or near to home and embedding a culture that supports remote working. The RLDP can support this shift in working practices by securing the provision of local shared working hubs, provision of broadband infrastructure and placemaking to ensure quality home environments.

16.1.6 It should be noted that not all of these jobs will be in planning B-class uses and many will be delivered through foundational sectors such tourism, leisure, food and retail and the agricultural and forestry sector, which play an important role within Monmouthshire's economy. Future Wales recognises and supports the significant role foundational and agricultural sectors can play in the Welsh economy generally but with significant relevance to supporting the rural economy (Policy 5 of Future Wales). The RLDP plans positively for these sectors through complementary Strategic Policies including S14 – Town, Local and Neighbourhood Centres, S11 – Rural Economy and S12 – Visitor Economy and associated detailed Development Management Policies.

16.2 Employment Land Reviews

16.2.1 In line with PPW12 and the requirement to provide an economic development evidence base to support LDP preparation, the Council commissioned the preparation of an Employment Land Review (ELR). This has undertaken a review of employment forecasts and B-use class land requirements for the Plan period 2018 – 2033. The study recommends that a forecast

scenario based on past take-up rates is adopted for the RLDP. This provides a minimum requirement of 38ha of employment land, including a five-year buffer to allow for choice and uncertainty in forecasting. The ELR breaks this down by individual land use types as follows:

- B1: 3.5ha
- B2: 9.2ha
- B8: 25.2ha

16.2.2 Providing for this level of jobs growth is part of a complex picture. A fundamental element will be the provision of a deliverable range of employment land supply, in appropriate locations and in the right quantities to attract new businesses and enable our existing businesses to grow. To ensure a range of types and sizes of employment land premises is provided, development within settlement boundaries will be permitted subject to detailed planning considerations. This includes the integration of new employment opportunities in mixed-use developments and small units and workshops for small businesses to promote new start-ups and support sustainable economic growth. However, it is recognised that many of the County's businesses are SMEs and may not require new land allocations to grow.

16.2.3 Moreover, there is an increased propensity for agile and home working over the longer term, meaning demand for physical employment land or space is changing. It is acknowledged that this tends to relate more to office-based sectors, and that not all sectors are able to work from home or in an agile manner. Having regard to the outcome of the evidence base set out above, the RLDP allocates sufficient employment land (B use class) to cover the employment needs of the County in locations consistent with the Plan's Spatial Strategy.

16.2.4 In accordance with PPW12, the ELR sits alongside the Regional Employment Study (Larger Than Local Study, March 2020), which covers a Larger than Local Area of Blaenau Gwent, Caerphilly, Monmouthshire, Newport and Torfaen. This related study provides a regional scale analysis of the economic evidence base and the property and employment land market in the Larger than Local Area, up to 2040 (the ELR covers the 2018 – 2033). This Study provides a regional viewpoint of demand and land requirements and recognises the important role the M4 corridor plays, as well as the strategic function of the north of the sub-region linking to Herefordshire and the west Midlands. Strategic employment sites should be geographically distributed throughout the region to support this.

16.2.5 In terms of land requirements, the Larger than Local ELR estimates Monmouthshire requires between 46ha and 60ha for the period 2018 – 2040 depending on the method adopted. This compares to an overall requirement of between 224ha and 275 ha for the five authorities. Full details are available in the Larger Than Local Study.

16.3 Employment Allocations

16.3.1 Strategic Policy S12 sets out the requirement to provide for a suitable range and choice of sites for industrial and business development in the County (classes B1, B2, B8 of the Town and Country Planning Use Classes Order 1987). Overall, the Plan makes provision for approximately 57ha of B use class land comprising employment land take up between the period 2018 – 2024 and new employment allocations for the remaining Plan period.

Employment Land Supply	
Employment Land Take Up 2018- 2024	Approximately 9ha
Employment Allocations	Approximately 48ha
Total Employment Provision	**Approximately 57ha**

16.3.2 Policy EA1 below identifies these new employment sites and mixed-use sites that include land for employment development in addition to residential.

Policy EA1 – Employment Allocations

The following sites are identified for new industrial and business development (Use classes B1, B2 and B8):

Site Ref	Site Name	Area (Ha)	Use Class
Industrial and Business Sites			
EA1a	Land at Nantgavenny Business Park, Abergavenny	0.59	B1
EA1b	Poultry Units, Rockfield Road, Monmouth	1.3	B1
EA1c	Land North of Wonastow Road, Monmouth	4.5	B1, B2, B8
EA1d	Newhouse Industrial Estate, Chepstow	2.5	B1, B2, B8
EA1e	Land adjoining Oak Grove Farm, Caldicot	6	B1, B2, B8
EA1f	Quay Point, Magor	14	B1, B2, B8
EA1g	Rockfield Farm, Undy	3.2	B1
EA1h	Gwent Euro Park, Magor	7	B1, B2, B8
EA1i	Raglan Enterprise Park, Raglan	1.5	B1, B2, B8
EA1j	Land West of Raglan	4.5	B1, B2, B8
Identified Mixed Use Sites			
EA1k	Land to the East of Abergavenny (see Policy HA1 for site specific policy requirements)	1	B1
EA1l	Land at Former MoD Site, Caerwent (see Policy HA9 for site specific policy requirements)	1	B1

EA1m	Land to the East of Caldicot/North of Portskewett (see Policy HA2 for site specific policy requirements)	1	B1
Total		48.09	

16.3.3 An Employment Land Schedule which sets out the phasing of the employment allocations is set out in Appendix 10.

16.3.4 The proposals plan identifies approximately 4ha of land at Newhouse Industrial Estate, Chepstow (EA1d) for employment uses, however, approximately 2.5ha of this has contributed to the employment land supply due to the other 1.5ha having planning permission for a petrol filling station and drive thru restaurants. The larger land allocation allows for employment uses to be favourably considered should the planning permission not be implemented.

16.3.5 Allocation EA1g – Rockfield Farm, Undy forms part of the Adopted LDP Rockfield Farm Mixed Use Strategic site and benefits from an extant planning permission.

16.3.6 Allocation EA1h – Gwent Euro Park, Magor is located within the Gwent Levels Site of Special Scientific Interest (SSSI) and also within Flood Risk Zone C1 (Development Advice Map) and Defended Flood Zone (Flood Map for Planning). The allocation area corresponds with land benefitting from an extant planning permission.

16.3.7 Allocations EA1l – Land at Former MoD, Caerwent and EA1m – Land to the East of Caldicot/North of Portskewett are situated within a Core Recreational Zone of 12.6km for the Severn Estuary European Marine Site identified by the Habitats Regulation Assessment. In accordance with Policy NR2 – Severn Estuary Recreation Pressure and the site-specific policy requirements set out in HA9 and HA2 respectively, development will be considered for a financial contribution as part of the Mitigation Strategy for the European designation. Green space design must also consider any emerging guidance for Suitable Alternate Natural Greenspace (SANG) to reduce recreational pressure on the features of the Estuary.

16.4 Protected Employment Sites

16.4.1 The provision of a suitable range and choice of sites for industrial and business development in the County also involves the protection of existing employment sites from alternative development. Policy E1 sets out the criteria against which development proposals for the alternative use of existing employment sites / premises will be assessed. Significant existing employment sites in the County are identified in Policy EA2 below, although Policy E1 will apply to all existing employment sites and premises even if not included in the following table.

Policy EA2 – Protected Employment Sites

The following existing sites as indicated on the Proposals Maps are protected for industrial and business development (Use Classes B1, B2 and B8):

Site Ref	Site Name

EA2a	Mill Street, Abergavenny
EA2b	Lower Monk Street, Abergavenny
EA2c	Union Road, Abergavenny
EA2d	Hatherleigh Place, Abergavenny
EA2e	Former Cranberry Foods, Abergavenny
EA2f	Nantgavenny Business Park, Abergavenny
EA2g	Station Road, Chepstow
EA2h	Job Centre, Chepstow
EA2i	Bulwark Road, Chepstow
EA2j	Beaufort Park, Chepstow
EA2k	Newhouse Industrial Estate, Chepstow
EA2l	Wonastow Road, Monmouth
EA2m	Mayhill/Hadnock Road, Monmouth
EA2n	Tri-Wall, Wonastow, Monmouth
EA2o	Magor Brewery, Magor
EA2p	Severn Bridge, Caldicot
EA2q	Cheeseman's Industrial Estate, Rogiet
EA2r	Progress Industrial Estate, Rogiet
EA2s	Wales One, Magor
EA2t	Cuckoo's Row, Raglan
EA2u	Raglan Enterprise Park, Raglan
EA2v	Grange Mill Industrial Estate, Raglan
EA2w	Little Castle Farm Business Park, Raglan
EA2x	Woodside Industrial Estate, Usk
EA2y	Mamhilad

16.5 Protection of Existing Employment Land

16.5.1 Reflecting a key objective of Policy S12 to protect existing employment land from alternative development, Policy E1 below sets out the criteria against which development proposals for the alternative use of existing employment sites / premises will be assessed.

Policy E1 – Protection of Existing Employment Land

Proposals that will result in the loss of existing or allocated industrial and business sites or premises (Use Classes B1, B2 and B8 to other uses will only be permitted if:

a) The site or premises is no longer suitable or well-located for employment use;

b) A sufficient quantity and variety of industrial sites or premises is available and can be brought forward to meet the employment needs of the County and the local area;

c) There is no viable industrial or business employment use for the site or premises;

d) There would be substantial amenity benefits in allowing alternative forms of development at the site or premises;

e) The loss of the site would not be prejudicial to the aim of creating a balanced local economy.

Exceptionally, planning permission may be granted for a change of use of existing employment land when the above criteria are not fully complied with if:

i) The proposal is for small scale retail uses which are ancillary to the main business / industrial activity; or

ii) Small scale service activities of an industrial nature which are not suited to the high street and involve the sale, service or repair of vehicles or machinery.

16.5.2 The importance of protecting existing employment sites / premises is of continuing value over the Plan period in order to ensure there is an appropriate portfolio of employment land and premises that can be safeguarded from competing uses and provides for a sufficient quality, range and choice. The policy applies to existing, allocated and permitted business, industrial and warehousing sites and premises.

16.5.3 The Council does, however, acknowledge that there may be instances where sites allocated or designated for employment use are no longer appropriate. In such cases the Council may be willing to review the employment allocation / designation and consider whether an alternative and more beneficial use of the site or premises would be appropriate. Consideration will also be given to whether the amenity of an area could be improved by the relocation of inappropriate industries and their replacement by a more suitable use.

16.5.4 Proposals for non-B uses will need to demonstrate that either the existing use is inappropriate or that the land or premises is surplus to the requirements of the employment market. Viability and marketing evidence must be provided to justify the loss of the employment land or premises. The type of evidence required will vary depending on individual circumstances but may include details of why the land or premises is no longer in use and evidence to show that appropriate and reasonable efforts have been made to market it for sale or lease for its existing or allocated use for a period of at least 12 months.

16.5.5 In terms of assessing whether sites / premises are well-located for business and industrial use, consideration will be given to accessibility to the primary highway network, sustainable travel and proximity to housing or other sensitive uses.

16.5.6 The Council consider that some B2 employment sites may also be suitable for modern waste management facilities, subject to detailed planning considerations. Further detail on potential sites for waste management facilities is provided in the Section 22 setting out the waste related policies.

16.6 Non-Allocated Employment Sites

16.6.1 Policy E2 below seeks to enable proposals for employment use on non-allocated sites by non-speculative, single-site users / specific large employers that cannot be accommodated on existing or proposed business/industrial sites and sets out the criteria against which such proposals will be assessed.

Policy E2 – Non-Allocated Employment Sites

Proposals for industrial and business development (Use Classes B1, B2 and B8) by non-speculative single-site users will be permitted provided that all the following conditions are met:

a) The proposed site is within or adjoining settlement boundaries of Primary Settlements or existing and proposed industrial / business sites;

b) It can be demonstrated that the proposal cannot be accommodated on existing or proposed industrial or business sites within the County;

c) The proposal is compatible with adjacent land uses;

d) There is a demonstrable need for the type and scale of development in that location; and

e) The proposal would cause no unacceptable harm to the surrounding landscape, historic / cultural heritage, biodiversity or local amenity value.

Such developments will be controlled with a Section 106.

16.6.2 It is considered that the plan provides for a sufficient variety – in terms of size, mix of uses, quality and distribution – of industrial and business sites within the County. However, there may be instances where a specific large employer cannot find a suitable site either on an existing or allocated industrial /business site, or within other local authority areas within the employer's area of search. In these instances, a planning application for industrial or business use, although to be advertised as a departure from the Plan, could be considered on a non-allocated site, taking into account detailed planning criteria and whether there is a need for the development.

S10 - Links to Wider Policy Framework	
RLDP Objectives	Objective 1 – Economic Growth / Employment Objective 9 – Demography

	Objective 11 – Place-making Objective 12 – Communities Objective 14 – Infrastructure Objective 15 – Accessibility
Future Wales: The National Plan 2040 (WG, February 2021)	Policy 4 – Supporting Rural Communities Policy 5 – Supporting the rural economy Policy 6 – Town Centre First
Planning Policy Wales Edition 12 (WG, February 2024)	Productive and Enterprising Places Theme (Chapter 5) - Economic Development
Well-being of Future Generations Act (WBFGA) (WG, 2015)	A prosperous Wales A resilient Wales A more Equal Wales A Wales of cohesive communities A globally responsible Wales
Gwent PSB Well-being Plan (August 2023)	• Take action to reduce the cost-of-living crisis in the longer term. • Enable and support people, neighbourhoods, and communities to be resilient, connected, thriving and safe.
Taking Monmouthshire Forward - Community and Corporate Plan 2022 - 2028 (April 2023)	This policy supports the Community and Corporate Plan objectives of ensuring Monmouthshire is a: • Thriving and ambitious place where there are vibrant town centres, where businesses can grow and develop.
Key Evidence	Monmouthshire 2040: Our Economic Growth and Ambition Statement (November 2019) Vision 2040: Growing Your Own Business Monmouthshire Inward Investment Prospectus (March 2020) Monmouthshire Employment Land Review (November 2022) Regional Employment Study – Larger than Local Study – Blaenau Gwent, Caerphilly, Torfaen, Monmouthshire and Newport (BE Group) (March 2020) Economies of the Future Analysis – Strategic Directions Report (October 2018) Economy, Employment and Skills Strategy (EESS) – 2023

17. Rural Enterprise

Strategic Policy S11 – Rural Economy

Development to enable rural enterprise uses and the diversification of the rural economy will be permitted outside settlement boundaries where it is of a scale and type compatible with the surrounding area and will cause no unacceptable harm to the surrounding landscape, historic and cultural heritage, biodiversity or local amenity value.

Development must re-use or adapt existing buildings where possible. The exceptional circumstances in which new buildings may be permitted outside settlement boundaries to support the rural economy are set out in RE1, RE3, RE4, RE5 and RE6.

17.1.1 The need to sustain and regenerate the County's rural economy is a key objective of the Plan. In allowing for an appropriate amount of diversification and enterprise in rural areas, the Plan seeks to sustain and enhance and, where appropriate, regenerate the County's rural settlements. The promotion of diverse economic activity is a key element of this, which is also recognised as a key objective of the Economy, Employment and Skills Strategy. More specifically, the Monmouthshire Local Food Strategy (May 2024), sets a long-term goal of fairer, greener, healthier food and farming in a flourishing economy that benefits all Monmouthshire's residents. Developing food as an economic sector is identified as a core theme in achieving this goal.

17.1.2 Future Wales 2040 has expressed a commitment to supporting vibrant rural areas. Policy 5 – Supporting the Rural Economy – establishes the national policy approach for LDPs to plan positively to meet the employment needs of rural areas through appropriate and proportionate economic growth.

17.1.3 National policy supports rural enterprise and agricultural diversification where it is environmentally acceptable. TAN 6: Planning for Sustainable Rural Communities (2010) advises that RLDPs should facilitate the diversification of the rural economy by accommodating the needs of both traditional rural industries and new enterprises, whilst minimising impacts on the local community and the environment. New enterprises should be small-scale, located within or adjoining settlement boundaries and not have an unacceptable impact on the local community or environment. Separate criteria apply to agricultural diversification as set out in TAN 6: Planning for Sustainable Communities. Diversification may include livestock, non-traditional livestock and crop farming, tourism projects and renewable energy proposals that help to increase the viability of the existing agricultural holding by reducing their operating costs. Policies RE1 – RE3 provide detailed policy criteria to assess rural enterprise and rural diversification proposals.

17.1.4 The significant role tourism plays in Monmouthshire's economy, particularly in assisting in the diversification of the rural economy, is also recognised. Diversification for such purposes could therefore assist in maintaining and enhancing local employment opportunities, with further details set out in Strategic Policy S12 – Visitor Economy and associated Development Management policies.

17.1.5 It is recognised that an important balance exists between rural enterprise and diversification and the need to promote sustainable development and maintain the local distinctiveness and high quality of Monmouthshire's environment. To achieve this balance, and in accordance with national planning policy, priority should be given to the re-use of existing buildings rather than the development of new ones. Where this is not possible, limited new build may be acceptable in exceptional circumstances. Detailed criteria in relation to this are set out below.

17.2 Employment in Secondary and Main Rural Settlements

17.2.1 PPW12 and TAN 6 recognise that local employment opportunities within rural settlements are essential to sustain and improve village communities and have a vital role in promoting healthy economic activity. In accordance with national guidance and reflecting the Council's vision for sustainable economic growth and prosperity, this policy seeks to allow the development of small-scale enterprises as an exception within and adjoining the settlement boundaries of Secondary and Main Rural Settlements identified in Strategic Policy S2.

Policy RE1 –Secondary and Main Rural Settlements Employment Exceptions

Within or adjoining the settlement boundaries of the Secondary and Main Rural Settlements identified in Policy S2, the construction of small-scale purpose built industrial and business development will be permitted, subject to detailed planning considerations, including:

a) The proposal would cause no unacceptable harm to the natural or built environment;

b) It can be demonstrated that the proposal cannot be accommodated on existing or proposed industrial or business sites with the County;

c) The proposal is compatible with surrounding land uses and in scale with the existing settlement.

17.2.2 PPW12 notes that new employment sites in rural locations are likely to be small and should generally be located within or adjacent to defined settlement boundaries. Small businesses often find village locations attractive places to establish a business and their presence provides valuable employment opportunities for local communities, reduces out-commuting, assists in diversifying the rural economy and thereby promotes sustainable development.

17.2.3 There may be instances where the development of new, or expansion of existing employment sites on the edge of settlements would be more acceptable from an amenity, environmental and highway safety view than development within the identified Secondary and Main Village settlements. Such development, however, needs careful consideration, particularly in relation to protecting the countryside from visual intrusion, and will be subject to detailed planning considerations.

17.3 Conversion or Rehabilitation of Buildings in the Open Countryside for Employment Use

17.3.1 PPW12 recognises that the re-use and adaptation of existing rural buildings has an important role in meeting the needs of rural areas for commercial and industrial development as well as agricultural diversification. Policy RE2 therefore provides the opportunity for the conversion and rehabilitation of existing buildings for business re-use, subject to detailed planning considerations.

Policy RE2 – The Conversion or Rehabilitation of Buildings in the Open Countryside for Employment Use

Proposals for the conversion or rehabilitation of existing buildings in the open countryside, to employment use will be permitted provided that all the following criteria are met:

a) The form, bulk, and general design of the proposal, including any extensions, respect the rural character and design of the building;

b) In respect of farm diversification proposals, any necessary re-building work should respect or be in sympathy with the location and traditional characteristics of the building; in all other cases the buildings should be capable of conversion without major or complete reconstruction;

c) The more isolated and prominent the building the more stringent will be the design requirements with regard to new door and window openings, extensions and means of access, service provision and curtilage, especially if located within the Wye Valley National Landscape (AONB);

d) The conversion of modern farm and forestry buildings will only be permitted if the building has been used for its intended purpose for a significant period of time. Particularly close scrutiny will be given to proposals relating to buildings that are less than 5 years old, or which are known to have been used for their intended purpose for less than 5 years, and where there has been no change in farming or forestry activities on the unit since the building was erected permission may be refused;

e) The proposal including curtilage and access, is in scale and sympathy with the surrounding landscape and does not require the provision of unsightly infrastructure and ancillary buildings; and

f) The building is capable of accommodating the proposed use without substantial extension.

The above criteria will also be applied to proposals to extend buildings that have already been converted.

17.3.2 In line with national guidance, it is recognised that the re-use and conversion of permanent buildings in the countryside provide a valuable opportunity to offer employment and support the rural economy. Due to their location, such developments must be carefully controlled, and a balance is required to protect the character and appearance of the existing building and the surrounding area.

17.3.3 Proposals for the conversion and rehabilitation of rural buildings for employment use will only be permitted where they conform to the criteria set out above and other relevant policies of the plan, particularly those which seek to minimise any detrimental effect on landscape value, environmental quality and amenity (including S5, LC1, PM 2 and NR1). In all cases it is essential that the proposed use and design has regard to the character, scale and appearance of the existing building and surrounding area. Further details will be provided in Conversion of Agricultural Buildings Design Guide Supplementary Planning Guidance.

17.3.4 The Council is also concerned about possible abuse to the system whereby agricultural and forestry buildings – particularly those built under permitted development rights – are constructed with the intention of early conversion to another use. This policy seeks to prevent any such attempts to abuse the planning system. Further guidance is provided in TAN 6 Planning for Sustainable Rural Communities.

17.4 Agricultural Diversification

17.4.1 In accordance with national policy, Policy RE3 supports the diversification of agriculture provided that proposals meet the criteria set out in this and other relevant plan policies, including S11 – Rural Economy.

Policy RE3 – Agricultural Diversification

Development proposals which make a positive contribution to agriculture diversification will be permitted where the new use or building meets the following criteria:

a) The proposed non-agricultural development is run in conjunction with, and is complementary to, the agricultural activities of the enterprise;

b) The proposal is supported by an appropriate business case which demonstrates the link to existing business activity and the benefits of the scheme in terms of sustaining employment / the rural economy;

c) In relation to new build, the applicant must demonstrate that there are no existing buildings suitable for conversion / re-use in preference to new build;

d) Any rebuilding work should respect or be in sympathy with the local and traditional characteristics of the building;

e) Proposals for new built development meet the criteria set out in Policy OC1.

17.4.2 It is recognised that agricultural businesses increasingly have to diversify into other forms of related activity to remain viable. TAN 6 Planning for Sustainable Rural Communities (2010) recognises that many economic activities can be sustainably located on farms. Possible diversification activities include farm shops, workshops and sport and recreation services – some of which are dealt with by other RDLP policies. It is important that such proposals contribute to and complement the agricultural activities of the farm, rather than dominate them and should be well-founded in terms of effectively contributing to the agricultural business. This policy therefore requires the applicant to provide a business case for diversification proposals in order to demonstrate the link to existing business activity and the benefits of the scheme, in relation to sustaining employment and the rural economy. This

should include details of existing farm activities, the need for diversification, and details and implications of the proposals on the rural economy (e.g. provision of local employment opportunities) and the environment.

17.4.3 Agricultural diversification proposals should be integrated into the environment and rural landscape. In line with national guidance, initial consideration should be given to adapting existing farm buildings, however the provision of a sensitively designed new building on a working farm within existing farm complexes may be appropriate (subject to meeting the criteria set out above and in Policy OC1 New Built Development in the Open Countryside) where a conversion opportunity does not exist.

17.5 New Agricultural and Forestry Buildings

17.5.1 This policy sets out the criteria for assessing proposals for new agricultural and forestry buildings.

Policy RE4 – New Agricultural and Forestry Buildings

New agricultural and forestry buildings, as well as any means of access and yard spaces, that are subject to planning control, will be permitted where:

a) The building, hard standing or access is necessary for agricultural or forestry purposes;

b) The building is functionally suitable for the specific use;

c) Adequate provision is made for the disposal of foul and surface water and any animal waste without risk to the environment.

17.5.2 Agricultural and forestry buildings can be a visually intrusive element in the rural landscape by virtue of their size, location and materials used in their construction. Where new buildings are required, careful consideration will be given to their location and design so that any adverse effect upon the character and amenity of the surrounding area is reduced to the practical minimum and will be required to satisfy the policy requirements of OC1 and LC1. Proposals should be designed for agricultural or forestry function and have regard to BS5502 – Code of Practice for Design of Buildings and Structures for Agriculture.

17.6 Intensive Livestock/Free Range Poultry Units

17.6.1 Intensive livestock farming can be defined as a specialised system of livestock production where the livestock are housed indoors and can be started up at any time of the year[39]. Intensive livestock units include buildings in which cattle are kept over the winter months.

17.6.2 Given their scale, intensive livestock and free-range poultry units can be difficult to assimilate into the landscape and can result in adverse amenity affects, including noise and odours. However, the careful siting and landscaping of such units can keep impacts to a practicable minimum. It is therefore important that proposals incorporate measures to limit their potential impacts, including noise and smell. The impact on water quality will need to be fully

[39] Source: Agriculturadictionary.com

assessed to demonstrate phosphate neutrality or betterment in line with the appropriate standards in place and proposals will be required to satisfy the requirements of the latest NRW guidance. Developers of intensive livestock or free-range poultry units are also directed to NRW intensive farming environmental permitting guidance notes: Guidance on environmental permitting for intensive farming of pigs and poultry and Planning permission and environmental assessment; Poultry units (Guidance note GN021).

17.6.3 Policy RE5 seeks to achieve a balance between the economic production of food and the protection of amenity and the environment (in conjunction with the use of planning obligations and conditions). Further guidance is also set out in TAN 6: Planning for Sustainable Rural Communities.

Policy RE5 – Intensive Livestock / Free Range Poultry Units

Intensive livestock or free-range poultry production units will be permitted subject to the following criteria:

a) New livestock units and associated slurry tanks and lagoons are sited so as not to cause unacceptable nuisance to any non-agricultural dwelling or building;

b) New units are sited so as to minimise their visual impact by avoiding exposed locations and, where practicable, locating them within or adjoining existing groups of buildings;

c) Units that have serious implications for the surrounding highway network will be resisted;

d) The unit is designed, and uses appropriate technology, to minimise the nuisance of smell, noise, air pollution and neutralise impact on water quality.

17.7 Agricultural Land

17.7.1 Given the importance of agriculture to Monmouthshire's rural economy it is recognised that there is a need to protect the best and most versatile agricultural land from inappropriate development. PPW12 sets out national planning policy on conserving the best and most versatile agricultural land.

17.8 Recreation and Leisure Facilities in the Open Countryside

17.8.1 Whilst there is a general presumption against inappropriate development in the countryside, it is recognised that suitable recreational, tourism and leisure uses can benefit the rural economy and assist in its diversification. Such development would be subject to adequate safeguards for the character and appearance of the countryside, particularly its landscape, biodiversity and amenity value. Such development should be sympathetic in nature and scale to the local environment and to the needs of visitors and the local community.

17.8.2 Policy RE6 supports rural enterprise and diversification of the rural economy by allowing for the provision of suitable recreational and leisure facilities in the countryside, subject to detailed planning considerations.

Policy RE6 – Provision of Recreation and Leisure Facilities in the Open Countryside

Development proposals for recreation and leisure uses in the countryside will be permitted subject to detailed planning considerations provided that:

a) They are of a small-scale, informal nature and, including adequate safeguards for the character and appearance of the countryside (particularly its landscape, biodiversity and local amenity value).

b) Development must re-use or adapt existing buildings where possible.

In exceptional circumstances new buildings of an appropriate scale may be acceptable where justified and where the proposal meets the criteria set out in Policy OC1.

17.8.3 In rural areas recreation and leisure related development is considered to be an essential element in providing for a healthy, diverse local economy and in contributing to the provision and maintenance of facilities for local communities.

17.8.4 It is considered that the countryside is best suited to low-key informal recreation and quiet, passive pursuits such as walking, picnic areas, cycling, fishing, rowing and sailing/boating. In assessing such proposals, particular consideration will be given to the need to safeguard the character and appearance of the countryside, particularly its landscape, biodiversity and local amenity value.

17.8.5 PPW12 recognises that the re-use and adaptation of existing rural buildings has an important role in meeting the needs of rural areas including sport and recreation. Proposals for the conversion / adaptation of buildings for such uses will be assessed against national policy set out in PPW12, TAN 6 and RE2, where appropriate. Where the re-use / adaptation of existing buildings is not possible, limited new build of an appropriate scale may be acceptable in exceptional circumstances where justified and where proposals meet the criteria set out in Policy OC1.

S11 - Links to Wider Policy Framework	
RLDP Objectives	Objective 1 – Economic Growth / Employment Objective 3 – Green Infrastructure, Biodiversity and Landscape Objective 6 – Land Objective 7 – Natural Resources Objective 9 – Demography Objective 11 – Place-making Objective 12 – Communities Objective 13 – Rural Communities Objective 15 – Accessibility
Future Wales: The National	Policy 4 – Supporting Rural Communities Policy 5 – Supporting the Rural Economy

Plan 2040 (WG, February 2021)	
Planning Policy Wales Edition 12 (WG, February 2024)	Productive and Enterprising Places Theme (Chapter 5)- Rural Economy
Well-being of Future Generations Act (WBFGA) (WG, 2015)	A prosperous Wales A resilient Wales A more equal Wales A Wales of Cohesive Communities
Gwent PSB Well-being Plan (August 2023)	• Take action to reduce the cost-of-living crisis in the longer term. • Enable and support people, neighbourhoods, and communities to be resilient, connected, thriving and safe.
Taking Monmouthshire Forward - Community and Corporate Plan 2022 - 2028 (April 2023)	This policy supports the Community and Corporate Plan objectives of ensuring Monmouthshire is a: • Thriving and ambitious place where there are vibrant town centres, where businesses can grow and develop.
Key Evidence	Monmouthshire 2040: Our Economic Growth and Ambition Statement (Nov 2019) Vision 2040: Growing Your Own Business Monmouthshire Inward Investment Prospectus (March 2020) TAN 6: Planning for Sustainable Rural Communities (2010) Economy, Employment and Skills Strategy (EESS) – 2023

Visitor Economy

18. Visitor Economy

Strategic Policy S12 – Visitor Economy

Development proposals that support Monmouthshire's visitor economy and promote sustainable forms of tourism will be permitted subject to material planning considerations.

Development proposals that would have an unacceptable adverse impact on features and areas of tourism interest and their landscape character and settings, or that would result in the unjustified loss of tourism facilities will not be permitted.

18.1.1 PPW12 recognises the importance of tourism to economic prosperity and job creation and its ability to act as a catalyst for environmental protection, regeneration, and improvement in both urban and rural areas. In rural areas tourism related development is an essential element in providing for a healthy, diverse local economy and in contributing to the provision and maintenance of facilities for local communities.

18.1.2 Future Wales 2040 equally values that tourism and leisure are a major and growing employer contributing to the Welsh rural economy. Policy 5: Supporting the Rural Economy sets out that sustainable forms of tourism including opportunities for green, active and cultural tourism should be explored within the planning policy framework. These forms of tourism are also reflected in 'Welcome to Wales: Priorities for the Visitor Economy:2020-2025' which focuses on promoting distinctively Welsh tourism that grows the industry, while also providing benefits of environmental sustainability and biodiversity protection (green tourism), health benefits

(active tourism) and social enrichment that is specific and unique to Welsh/Monmouthshire identity (cultural tourism).

18.1.3 Tourism plays a significant part in the Monmouthshire economy, particularly in assisting in the diversification of the rural economy and in sustaining the County's historic town centres. Monmouthshire benefits from extensive natural and cultural assets that offer considerable potential for residents and visitors to enjoy. The County is noted for its natural beauty and has a rich and diverse landscape stretching from the coastline of the Gwent Levels in the south to the uplands of the Bannau Brycheiniog National Park (BBNP) in the north and the picturesque river corridor of the Wye Valley National Landscape (AONB) in the east. Monmouthshire's historic market towns, castles and cultural/heritage assets are also key attractions.

18.1.4 The visitor economy provides jobs, services and facilities that are essential to the well-being and enjoyment of local communities and residents of Monmouthshire. According to figures supplied by tourism economic indicator STEAM (Scarborough Tourism Economic Activity Monitor), the sector brought in £285m to Monmouthshire's economy in 2022 and supported the equivalent of 3,356 full-time jobs (STEAM report 2022). The report also indicates that although there has been an increase in overall bed stock in Monmouthshire, this increase has been in non-serviced accommodation[40] while serviced accommodation[41] has continued to decline.

18.1.5 Given the importance of tourism to the Monmouthshire economy, particularly the rural economy, the need for the RLDP to safeguard, provide and enhance the visitor economy/tourism facilities is essential in ensuring that Monmouthshire realises its potential as a high quality and competitive visitor destination. The RLDP therefore provides a supportive policy framework for sustainable tourism proposals throughout Monmouthshire and prevents the loss of tourism facilities, with more detailed criteria-based policies in T1 and T2.

18.2 New or Extended Tourism Accommodation and Facilities in the Open Countryside

18.2.1 Policy T1 seeks to support new or extended tourism accommodation and facilities (serviced and non-serviced) in open countryside locations that embrace and evidence sustainable forms of tourism including green, active and cultural tourism, supporting Monmouthshire's rural economy. It is, however, important that proposals for such developments within open countryside locations are not at the expense of environmental considerations. This Policy therefore seeks to carefully manage the development of tourism accommodation and facilities in the open countryside.

[40] Non serviced accommodation are facilities that offer no additional services other than the place you stay, such as holiday lets and glamping units)

[41] Serviced accommodation (where cleaning and cooking services are provided, such as hotels and B&Bs)

Policy T1 – New or Extended Tourism Accommodation and Facilities in the Open Countryside

Development proposals for sustainable tourism accommodation and facilities in the open countryside will only be permitted if the proposal can be justified against any of the following criteria:

a) Is of a small scale appropriate to its context and a non-permanent nature that would cause no material harm to the landscape character and environmental/biodiversity quality of the surrounding area, either individually or cumulatively with other development in the area; or

b) Contributes to agricultural diversification or an existing rural enterprise business and meets the criteria set out in S11 and RE3; or

c) Consists of the conversion/rehabilitation of an existing rural building meeting criteria set out within Policy H4; or

d) Relies upon a geographically fixed resource which exceptionally justifies the development; or

e) Is located within or adjacent to an existing visitor attraction or accommodation as ancillary development to established medium or large hotels.; or

f) Demonstrates significant economic benefit to Monmouthshire.

Sustainable tourism proposals in the open countryside that accord with any of the criteria above must also meet all of the following criteria set out in (g)-(l) below:

g) Protect, maintain and enhance landscape character, biodiversity, the resilience of ecosystems and the historic environment;

h) Are of a scale, permanency and design appropriate to site context;

i) Incorporate sustainable and efficient resource use;

j) Have the necessary infrastructure capacity;

k) Prioritise, promote and facilitate sustainable travel and have safe and efficient highway design;

l) Do not have an unacceptable amenity impact on occupiers of neighbouring properties.

All tourism proposals must be evidenced with a 'Sustainable Tourism Need and Impact Assessment' (STNIA).

All tourism proposals are required to be short-stay only and not extend beyond a period of stay of 28 days.

18.2.2 The policy requirements set out in T1 ensure proposals for new or extended tourism accommodation and facilities in the open countryside demonstrate and deliver sustainability principles, in accordance with National Policy and Strategic Policy S12. Tourism proposals must deliver positive benefits through innovative design, sustainable and efficient resource use,

environmental/biodiversity enhancement and net gain. Tourism proposals within or near to the statutory landscapes of the Blaenavon Industrial Landscape World Heritage Site (BILWHS), Bannau Brycheiniog National Park (BBNP) and Wye Valley National Landscape (AONB) will also be required to meet respective landscape policy criteria of LC2, LC3 and LC4. Development proposals involving lighting would need to meet requirements of LC5 to ensure the tranquillity of the dark night skies.

18.2.3 New tourism accommodation and facilities proposals need to consider sustainable travel opportunities from the outset and identify initiatives to improve sustainable travel to and around the tourism location. The scale of proposals will need to be carefully considered to ensure any impact on the highway network is acceptable in accordance with sustainable transport policies ST1 and ST2. In accordance with Policy EP1, proposals must consider the need to protect amenity and ensure no harm to existing neighbouring uses, such as overlooking and noise impact.

Supporting infrastructure

18.2.4 Supporting ancillary infrastructure, such as amenity blocks, drainage and foul sewage disposal, hard-standings and operational development may not necessarily be appropriate in open countryside locations. These infrastructure requirements are likely to have negative urbanising and environmental impacts causing harm to the surrounding open countryside setting and landscape character. Therefore, the need for supportive ancillary infrastructure and foul drainage requirements must be demonstrated within the supporting Sustainable Tourism Need and Impact Assessment (STNIA) and, wherever possible, existing buildings should be utilised.

18.2.5 As set out in policies S11 and RE3, sustainable tourism uses can complement and help support farm businesses and Monmouthshire's rural economy. Tourism proposals in the open countryside should seek to re-use existing buildings within the farm unit/ farmstead. Proposals for new build tourist facilities such as glamping units located on farmland (outside of the farmstead away from existing buildings), must meet all the criteria (g) –(l) of Policy T1. New build proposals akin to new dwellings for holiday use will not be supported. Rural conversions to holiday let use can offer scope for a tourism use where they would normally be resisted for a residential use due to limited space and amenity, as they are intended to be used on a short-term basis and do not require additional paraphernalia.

Camping, touring caravans and glamping proposals

18.2.6 Certain tourism proposals by their purpose and function will require a countryside location. This is true for caravan sites, camping sites and more recently glamping proposals (including pods, shepherds huts and yurts) which have become increasingly popular with the staying visitor market. The scale and permanence of these proposals is a key consideration in determining their acceptability. In general, the policy is supportive of non- permanent 'camping and glamping' tourism proposals, such as touring caravans, tents, yurts, shepherds huts and proposals that do not require intrusive new build infrastructure, such as new build amenity blocks. Permanently sited new accommodation, such as static caravans, lodges and larger self-contained glamping units that require significant infrastructure requirements will require careful consideration and comprehensive justification with an STNIA.

Other exceptional circumstances

18.2.7 Exceptionally, tourism proposals may be considered acceptable in the open countryside if the proposal relies upon a geographically fixed resource, such as dis-used quarries, lakes/reservoirs, or are adjacent to an existing visitor attraction or tourism accommodation as ancillary development to established medium or large hotels.

18.2.8 Furthermore, a proposal that brings significant economic benefit in Monmouthshire may be exceptionally considered. Such proposals would need to be carefully balanced with underlying sustainability and design principles to ensure the protection of the surrounding open countryside character.

Sustainable Tourism Needs Impact Assessment (STNIA)

18.2.9 All proposals for a tourism facilities and accommodation need to be supported with a comprehensive Sustainable Tourism Needs Impact Assessment (STNIA).

18.2.10 The STNIA should be proportionate to the nature of the proposal, its scale and location. However, as a general overview the type of information required would include:

- Evidence to support why the tourism facility is needed. For example, no such facilities or sites exist within the locality.
- Evidence to indicate the proposal is a viable business and how the business will support Monmouthshire's economy.
- How the proposal is in accordance with sustainability principles. For example, it delivers green (environment and biodiversity benefits), active (health benefits) and/or cultural (specific to Welsh/Monmouthshire identity) tourism.
- A transport statement to assess sustainable travel opportunities and initiatives to improve sustainable travel to the tourism location, anticipated levels of vehicular traffic, parking space demand and highway safety impact.
- Infrastructure requirements in relation to foul sewage.
- Design Statement setting out how the design, scale and permanence is appropriate to site context and setting. The design statement, where appropriate, should also detail the exit strategy and decommissioning.
- A Landscape and Visual Impact Statement (LVIA) including details of mitigation.
- A Green Infrastructure (GI) statement or assessment and details of how biodiversity and ecosystem resilience will be maintained and enhanced .

18.2.11 To ensure individual units will not be available for private residential use, planning permissions for tourism accommodation will be controlled with either planning conditions or a S106 agreement. This will ensure that such accommodation is maintained as holiday use for short stay periods.

18.3 Protection of existing tourism facilities

18.3.1 Policy T2 seeks to retain a variety of tourism facilities to ensure there is a wide range and choice of facilities in Monmouthshire. The Council would only support the loss of a tourism facility where it can be demonstrated that the facility is no longer suitable or viable for tourism use, and its loss would not adversely affect the range and quality of tourism facilities available within the locality and/or County. Information and evidence to support such a proposal would be needed in relation to the length of time a facility has been vacant and associated marketing evidence, demand trends in occupancy rates and customers preferences and the suitability of the building in terms of size and layout for modern serviced accommodation.

Policy T2 – Protection of existing tourism facilities

The loss of a tourism facility will only be permitted if:

a) Its loss would not adversely affect the range and quality of tourism facilities available within the locality and/or County; and

b) It can be demonstrated that the facility is no longer suitable or financially viable and could not be expected to become financially viable for tourism use.

S12 - Links to Wider Policy Framework	
RLDP Objectives	Objective 1 – Economic Growth / Employment Objective 3 – Green Infrastructure, Biodiversity and Landscape Objective 11 – Place-making Objective 12 – Communities Objective 13 – Rural Communities Objective 15 – Accessibility Objective 16 – Culture, Heritage and Welsh Language Objective 17 – Climate and Nature Emergency
Future Wales: The National Plan 2040 (WG, February 2021)	Policy 4 – Supporting Rural Communities Policy 5 – Supporting the Rural Economy
Planning Policy Wales Edition 12 (WG, February 2024)	Productive and Enterprising Places Theme (Chapter 5)- Tourism Rural Economy Distinctive and Natural Placemaking and well-being
Welcome to Wales: priorities for the visitor economy 2020-2025	Tourism strategy for Wales
Well-being of Future Generations Act (WBFGA)	A prosperous Wales A resilient Wales

(WG, 2015)	A more equal Wales A Wales of Cohesive Communities
Gwent PSB Well-being Plan (August 2023)	• Take action to reduce our carbon emissions, help Gwent adapt to climate change, and protect and restore our natural environment.
Taking Monmouthshire Forward- Community and Corporate Plan 2022-2028 (April 2023)	This policy supports the Community and Corporate Plan objectives of ensuring Monmouthshire is a: • Green place to live and work, with reduced carbon emissions, and making a positive contribution to addressing the climate and nature emergency. • Thriving and ambitious place where there are vibrant town centres, where businesses can grow and develop.
Key Evidence	• Sustainable Tourism Accommodation SPG – Nov 2017 • Rural Conversions to a Residential or Tourism Use SPG – 2017 • Monmouthshire's Destination Management Plan 2017-2020 • Living Locally in Rural Wales: Planning policy and practice RTPI discussion paper 2022

Sustainable Transport

19. **Sustainable Transport**

19.1.1 Reflecting the National Policy approach of the Llwybr Newydd The Wales Transport Strategy (WTS) 2021, Future Wales 2040 and PPW12, Strategic Policy S13 sets out the requirements for development proposals to be in accordance with the Sustainable Transport Hierarchy, which places an emphasis on development to be located and designed in a way which ensures the reduction in the need to travel and a shift away from the private car for travel.

Strategic Policy S13 – Sustainable Transport

Development proposals will be required to accord with the Sustainable Transport Hierarchy, as set out in National Policy. This will be facilitated by:

a) Promoting and prioritising active travel (walking, wheeling and cycling) and public transport above private motor vehicles, using location and design to reduce the need to travel;

b) Maintaining and improving on the Active Travel Network Maps (ATNMs) to maximise active travel opportunities, including links to these networks associated with new developments;

c) Ensuring development enables transition to Ultra Low Emission Vehicles (ULEVs) by providing necessary underlying infrastructure;

d) Ensuring developments are designed to provide safe and efficient access and safe and efficient capacity to the transport network;

e) Ensuring developments are served by an adequate level of parking provision, with cycle parking given competitive advantage, in accordance with relevant guidance;

f) Demonstrating how proposals enable solutions to rural transport issues, where appropriate, and;

g) Promoting digital and innovative infrastructure in both urban and rural areas to enable remote access to work, education and services.

19.1.2 For the purposes of this policy, reference to adequate in respect of the quantum of parking refers to that which is consistent with relevant guidance including the Council's SPG on Parking and Active Travel Act guidance (ATAG) re: motorised vehicle and cycle parking, respectively.

19.1.3 In line with the Active Travel Act 2013 and Welsh Government Active Travel Act Guidance (2021), the Council has produced Active Travel Network Maps (ATNMs) identifying the walking, cycling and wheeling routes required to create fully integrated networks. Proposed new developments are required to have regard to ATNMs and provide additional linkages where appropriate. Further information on Monmouthshire's existing and future active travel routes are detailed on the Welsh Government's ATN maps.

19.1.4 Rural Transport

19.1.5 Monmouthshire is a rural county, and while the majority of its population is concentrated in towns, it is recognised that travel by car may be the only realistic mode of travel for some in rural areas, where there is limited public transport infrastructure. As such, developments will be required to make provision to accommodate vehicular traffic and maintain and improve the highway network. This should not, however, translate into traffic in settlements or favouring car transport where more sustainable, efficient and effective options can be made available.

19.1.6 The Llwybr Newydd Wales Transport Strategy (WTS) has committed to a Rural Pathway which sets out how regional Corporate Joint Committees (CJCs) and Welsh Government policy makers will work together on strategies to tailor solutions to extend the geographical reach of public transport and school transport links into rural areas, as well as trip reduction through car sharing schemes and e-bikes and the creation of local distribution networks hubs to help manage the impacts of increasing home deliveries. Development proposals in rural areas of Monmouthshire should therefore demonstrate innovative solutions to connect rural locations to services and facilities.

Regional Planning

19.1.7 The Llwybr Newydd Wales Transport Strategy (WTS) sets out a National Transport Delivery Plan (NTDP) for Regional Transport Plans (RTPs) to tailor delivery of the WTS to the needs of every part of Wales. RTPs will be prepared by Corporate Joint Committees (CJCs) and delivered by Local authorities.

19.1.8 Monmouthshire is part of the South East (CJC) Region of Wales and development proposed in the RLDP will need to demonstrate how regional aspirations and opportunities can be incorporated in local plans as part of a joined up approach with transport planning and local land use planning. Future Wales 2040 policies 11 and 12 set out National and Regional transport plans and initiatives for Wales and the importance to strategically plan for opportunities arising from the investment in public transport. The recent South East Wales Transport Commission Final Recommendations Plan 2020 recommends various 'Network of Alternatives' to solve congestion and travel reliance on the M4 travel route, which sets out public transport and active travel improvement schemes and the need for a 'behavioural shift' in people to change commuting patterns. Within Monmouthshire the report specifically recommends enhancement of the Severn Tunnel Junction railway station and access arrangements. Policy 36 of Future Wales: South East Metro, which Monmouthshire is a part of, further identifies the Metro as "a major strategic opportunity to improve rail, bus, cycling and walking infrastructure across the region" and that the local planning policy frameworks must ensure that long term strategic decisions maximise opportunities in areas that will benefit from the Metro.

19.1.9 The RLDP therefore proposes strategic development within Monmouthshire's most sustainable locations that have opportunities and potential to connect and link with regional travel aspirations and RTPs, including identified opportunities at Severn Tunnel Junction and the South East Wales Metro scheme.

Strategic Transport Assessment

19.1.10 A Strategic Transport Assessment (STA) has been prepared to consider the impact (by means of modelling and quantifying the demand on the network and changes to the flow/movement

on the network) of the proposed strategic sites, as well as the cumulative impact of all residential allocations across the County. The study will also help inform the Transport Assessments for proposed new development. A Local Transport Strategy 2024-2029 (LTS) has been prepared to set out the Council's transport priorities over the years 2024-2029. The RLDP will support active travel, public transport and road improvement schemes identified within the LTS and where required, safeguard land for their development under Policy ST5. The LTS is expected to feed into the statutory Regional Transport Plan (RTP) that the South East Wales Region is anticipated to commence preparation of in 2024.

19.2 Sustainable Transport policies

19.2.1 In accordance with Strategic Policy S13 the following development management policies set out how sustainable transport considerations will be delivered, protected and safeguarded throughout the County.

19.3 Sustainable Transport Proposals

19.3.1 Policy ST1 seeks to ensure that development proposals accord with the Sustainable Transport Hierarchy and that proposals are able to provide necessary and related improvements to the highway system, or provide a contribution towards improvements connected to the proposed development to overcome identified problems. Development proposals that would generate unacceptable additional traffic growth or adversely affect the safe and efficient operation of a highway system will not be permitted.

Policy ST1 - Sustainable Transport Proposals

All developments which are likely to have a significant impact on trip generation and travel demand must be accompanied by a Transport Assessment (TA). The TA must include a Transport Implementation Strategy that accords with the Sustainable Transport Hierarchy as set out in National Policy and develop a strategy to reduce the need to travel, facilitate, promote and prioritise active travel and ensure access to the public transport network. In town centre locations car-free development will be supported where practicable.

If a rural location is essential for the proposed development, links to public transport should be considered and if necessary, included. A proportionate approach will be applied to the assessment of TAs and their accordance with the Sustainable Transport Hierarchy.

Any new highway infrastructure and design will be expected to satisfy Active Travel Act Guidance (ATAG), National and Local highway design guides and parking guidelines.

Financial contributions may be required for safety/congestion mitigation measures, or towards improvements to the highway network and sustainable travel.

Developments that are likely to create significant additional road traffic growth, or adversely affect the safe and efficient operation of the highway system will not be permitted.

Transport Assessments and Travel Plans

19.3.2 Transport Assessments (TAs) are an important mechanism for setting out the scale and anticipated impact of a proposed development. National Policy (TAN18) sets out the thresholds above which development proposals will need to be accompanied by a TA, although the local planning authority will require a TA whenever it considers there is a justification of a specific need. The TA will indicate whether improvements or mitigation are needed to overcome any specific problems.

19.3.3 TAs provide an important basis for the preparation of Travel Plans which will be utilised to ensure the integration of new development aligns with the Sustainable Transport Hierarchy. Travel plans for residential schemes must identify key trip attractors, including schools, healthcare facilities, shopping areas, local bus stops, public transport interchanges and employment areas. All non-residential developments must likewise identify key trip origins. In both cases, the developer must analyse active travel and public transport links and identify improvements.

19.3.4 Travel plans should demonstrate how road network demand will be mitigated through trip reduction, efficiency and modal shift. Mitigation measures can include route infrastructure, promotion and facilitation. The travel plan should also identify and provide facilities supportive to active travel and/or public transport provision (e.g. signage, cycle parking). Section 2(8) of the Active Travel Act defines a range of features as related facilities for the purposes of the act (as set out in the paragraph below). This will enable behavioural change by giving people the supportive environment and facilities required to make the transition from car to active travel modes of transport and encourage the use of public transport facilities. These should be proportionate to the purpose, location and scale of the development.

19.3.5 As a general overview the type of detail required, although not limited to, would be:

- Signage/wayfinding;
- Seating;
- Sufficient cycle parking (a mix of secure/covered and easy-access);
- Suitable electric bike charging facilities;
- Public bike pumps;
- Bins;
- Drinking water fountains;
- Toilets, changing and shower facilities within workplaces and/or community facilities;
- Public Transport:
- Display boards for public transport timetable and route information;
- Bus stop shelters/seating.

19.3.6 For active travel routes linking to public transport and active travel routes off-site, design and construction by the developer is preferred: in such instances developers will enter into a highway improvement agreement with the Authority and carry out work after agreeing designs with MCC Highways and Active Travel Officers.

19.3.7 TAs should also set out how they plan for ULEVs and charging points/infrastructure should be planned as part of the proposed development. Charging facilities must not compromise the active travel offer (i.e. loose cables should not create a hazard, charging points must not narrow footways below minimum width or be next to car parking or on pavement build-outs).

19.3.8 TAs should be informed by local context, including up-to-date public transport accessibility with the objective of reducing reliance on the car and supporting modal shift to walking, cycling and public transport. Therefore, in town centres where there is ease of access to public transport facilities, car-free development will be supported.

19.3.9 It is recognised that Monmouthshire is predominantly a rural county and while development is directed to the County's most sustainable settlements, the RLDP also supports appropriate development within Monmouthshire's rural locations where justified by other RLDP policies. This is important in supporting our rural economy and in sustaining our rural communities. In such instances, an accompanying TA will need to address Monmouthshire's rural context which will be assessed proportionally by LPA Officers. TAs for rural locations should also consider and demonstrate innovative solutions to connect rural locations to services and facilities, such as enabling multi-modal journeys, improvements to public transport, car-sharing schemes and/or other solutions to reduce travel in the first place, such as improvements to digital infrastructure to facilitate remote access to employment, education and other services from rural locations.

19.3.10 Further guidance on TAs and Travel Plans can be found in National Policy, including TAN18.

19.4 Highway Design Considerations

19.4.1 The Council will seek to adopt and maintain all new transport routes within developments. Additions to the highway network including footways and active travel routes, junctions, circulation and parking must be built to appropriate standards of design, construction, capacity, safety and amenity and be inclusive for all users.

19.4.2 Connecting communities by sustainable modes should be a primary consideration in local highway design, space allocation and junction priority to balance safety, comfort, and efficiency for all road users. Measures such as landscaping and modal filters should be planned to improve active travel permeability and prevent transgression of vehicles into spaces not designed for them. Priority at junctions should be assessed using the Sustainable Transport Hierarchy.

19.4.3 In determining whether proposed highway details are appropriate, the Council will have regard to national, regional and local guidance, which give advice on general matters applicable to all new highway development, residential roads and industrial estate roads.

19.5 Highway Hierarchy

19.5.1 Policy ST2 sets out Monmouthshire's highway hierarchy which will be used to assess the merits of requests for additional accesses to the network and priorities for improvement.

19.5.2 Traffic segregation is necessary in the interests of safety and the efficiency of the highway system. Inter-urban traffic requires routes that have relatively fast design speeds and are relatively uninterrupted by junctions, turning traffic and slow-moving traffic. Particular regard will be paid to the role of the strategic and arterial routes in supporting the future economic prosperity of Monmouthshire. In contrast, access routes are usually unsuitable for through traffic, particularly HGV's. However, in all instances the implications for residential amenity, landscape and nature conservation interests will be taken into account.

Policy ST2 – Highway Hierarchy

The following transport routes are identified as the main routes in the County for the movement of people and goods. Development proposals should be assessed from the appropriate level highway in the hierarchy, which comprises the following routes:

a) **Strategic Routes**:
- Motorways M4 and M48;
- Trunk roads A40T, A48T, A4042T, A449T, A465T, and A466T

Only in exceptional circumstances, will new direct accesses be permitted off Strategic Routes. Proposals that would result in short local journeys on these routes and add to unacceptable congestion will be refused.

b) **Arterial Routes**:
- A48 (High Beech Roundabout, Chepstow to Newport)
- A466 (High Beech Roundabout, Chepstow to Herefordshire boundary north of Monmouth)
- A472 (Little Mill to Usk Interchange)
- A4077 (Gilwern to Powys boundary)
- A4136 (Monmouth to Gloucestershire boundary)
- A4143 (Llanfoist to Brecon Road, Abergavenny)
- B4245 (Parkwall to Magor)
- A4810 (M4 Junction 23A to Newport Boundary)

On arterial routes 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.

c) **Local Routes**:
- B4233 (Monmouth to Abergavenny)
- B4235 (Usk to Chepstow)
- B4246 (Llanfoist to Gilwern)
- B4251 (Abergavenny to Skenfrith)
- B4269 (Llanfoist to Llanellen)
- B4293 (Chepstow to Monmouth)
- B4347 (Rockfield to Grosmont)
- B4598 (Abergavenny to Usk).

On local routes parking and turning movements may be restricted and the number of frontage accesses limited on road safety and traffic movement (especially public transport) grounds.

d) **Access Routes**

These roads are those not listed in (a), (b) or (c) above. If appropriate, parking, turning movements, traffic speeds and the number of frontage access will be limited on road safety, amenity and traffic movement grounds.

19.5.3 Strategic routes (motorways and Trunk roads) fall into the remit and control of Welsh Government Highways.

19.6 Freight

19.6.1 Policy ST3 seeks to ensure the efficient movement of freight and reduce heavy road freight traffic through developing rail freight facilities, safeguarding existing rail sites and facilities, and promoting sustainable last-mile solutions.

19.6.2 The County's rail network provides a strategic transport link at a local, regional and national level. The economic prosperity and attractiveness of the whole region to inward investment will be influenced by the quality and efficiency of these rail links. The existing rail network may also provide opportunities to develop road / rail transfer points, the development of which could contribute to the reduction of heavy road freight traffic. All such schemes will be subject to detailed planning considerations and guidance as set out in national planning policy.

19.6.3 So-called 'Last-mile' deliveries, the distribution of commercial goods to the end-user (often in light goods vehicles (LGVs)), increasingly contribute to road traffic increase and pose particular risks to road safety and active travel propensity. Plans that include last-mile distribution should show consideration and mitigation of this impact, preferably through trip reduction and the use of sustainable transport modes.

Policy - ST3 Freight

To reduce or prevent heavy road freight traffic, opportunities to develop freight transfer points between road / rail / last mile sustainable transport should be explored and will be favourably considered subject to detailed planning considerations.

The development of facilities for the movement of freight by rail will be favourably considered, subject to detailed planning considerations. Proposals which would prejudice the operation of, or cause the loss of, freight sites and facilities will not be permitted, unless the facility has closed or is closing and it can be shown that there is no realistic prospect of it resuming, having regard to its potential viability in the long term.

19.7 Rear Access and Service Areas

19.7.1 The Council supports the implementation of traffic management measures in town centres by removing non-essential traffic and allowing car-free developments. Policy ST4 seeks to achieve this aim by enabling the provision of rear access/service areas within Central Shopping and Commercial Areas (CSCAs). It is recognised that provision of rear access and servicing in historic settlements can be difficult unless part of a larger development scheme, although there may be opportunities for such facilities in small-scale developments. Within Conservation Areas proposals will also be required to satisfy HE1.

Policy ST4 – Rear Access/Service Areas within Central Shopping and Commercial Areas

Development within the defined Central Shopping and Commercial Areas that require servicing must, where feasible, include provision for rear access and servicing.

Development that relies on the use of on-street servicing will only be permitted where this would not conflict with walking, cycling and general traffic flows, or create highway dangers.

Development that would result in the loss of rear service roads or yards will only be permitted if satisfactory alternative provision is made.

19.8 Supporting Provision of and Safeguarding Routes for New Transport Schemes

19.8.1 Policy ST5 seeks to support and safeguard land for active travel, public transport schemes and road improvement schemes which have been identified in the Local Transport Strategy (LTS). Where known, the safeguarded routes are shown on the Proposals Map.

Policy ST5 - Transport Schemes

The following transport schemes identified in the Local Transport Strategy will be supported and safeguarded from development that would likely prejudice their implementation:

Active Travel schemes

a) Abergavenny and Llanfoist Active Travel Schemes
b) Caldicot Active Travel Schemes
c) Chepstow Active Travel Schemes
d) Monmouth Active Travel Schemes
e) Usk Active Travel Schemes
f) Magor and Undy Active Travel Schemes
g) Undy to Rogiet Active Travel improvements alongside B4245

Public Transport Improvement schemes

h) Abergavenny Train Station improvements
i) Abergavenny Bus Station improvements
j) Chepstow Transport Hub (rail and bus)
k) Severn Tunnel Junction Interchange improvements (rail and bus)
l) Monmouth Bus/Coach Stop
m) Magor Walkway Station

Road Schemes

n) B4245 /M48/ Severn Tunnel Junction Link Road

o) B2425/Severn Tunnel Junction Link Road

p) Chepstow Highbeech Roundabout improvements

19.8.2 Proposed new active travel routes must meet ATAG and opportunities should be maximised to further improve upon existing infrastructure. Opportunities for active travel routes to connect to, improve and develop long distance regional and national walking and cycling routes, for example the Wales Costal Path and the National Cycle Network (NCN), should be explored, if there is the opportunity to do so.

19.8.3 Public transport improvement schemes should provide for convenient modal interchange, such as bike parking and park and ride, to promote multi-modal sustainable transport options to reduce congestion and parking demand in town centres. Public transport should be easily located, accessible and convenient by walking, wheeling and cycling.

19.9 Redundant Routes

19.9.1 Policy ST6 seeks to safeguard redundant routes, such as former canal and rail routes, from development where there is realistic prospect of their re-use for transport purposes in the future. This should ensure that such facilities remain available for future sustainable transport use through the provision of new leisure, active travel and horse-riding routes and can be considered an important part of the green infrastructure network.

Policy ST6 – Protection of Redundant Routes

Redundant routes, such as former canal and rail routes and associated features, will be protected from development that would prejudice future sustainable transport use.

S13 - Links to Wider Policy Framework	
RLDP Objectives	Objective 1 – Economic Growth/Employment Objective 8 – Health and Well-being Objective 9 – Demography Objective 11 – Place-making Objective 12 – Communities Objective 13 – Rural Communities Objective 14 – Infrastructure Objective 15 – Accessibility Objective 17 – Climate Change

Future Wales: The National Plan 2040 (WG, February 2021)	Policy 11 – National Connectivity Policy 12 – Regional Connectivity Policy 36 – South East Metro
Planning Policy Wales Edition 12 (WG, February 2024)	Active and Social Places Theme (Chapter 4)- Moving within and between places
Well-being of Future Generations Act (WBFGA) (WG 2015)	A prosperous Wales A resilient Wales A more equal Wales A Wales of cohesive Communities
Gwent PSB Well-being Plan (August 2023)	• Take action to reduce the cost-of-living crisis in the longer term. • Take action to reduce our carbon emissions, help Gwent adapt to climate change, and protect and restore our natural environment.
Taking Monmouthshire Forward- Community and Corporate Plan 2022- 2028 (April 2023)	This policy supports the Community and Corporate Plan objectives of ensuring Monmouthshire is a: • Fair place to live where the effects of inequality and poverty have been reduced. • Green place to live and work, with reduced carbon emissions, and making a positive contribution to addressing the climate and nature emergency. • Thriving and ambitious place where there are vibrant town centres, where businesses can grow and develop.
Key Evidence	• Llwybr Newydd: WTS 2021 • Welsh Government Active Travel Act Guidance July 2021 • TAN18: Transport • South East Wales Transport Commission: Final Recommendations: November 2020 • Roads Review Report February 2023 • Monmouthshire Local Transport Strategy 2024-2029 • ATNM's for Monmouthshire • Living Locally in Rural Wales: Planning policy and practice RTPI discussion paper 2022

Retail & Commercial Centres

20. Retail and Commercial Centres

20.1 Retail Hierarchy

20.1.1 The need to sustain and enhance the County's towns and local centres as vibrant and attractive centres, serving the needs of their population and those of their surrounding hinterlands, is a key objective of the RLDP. PPW requires local planning authorities to identify a hierarchy of centres, distinguishing between higher order centres that have a wider range of uses and larger catchment areas, and lower order centres which are important to communities for day-to-day needs. Policy S14 sets out this hierarchy for Monmouthshire helping to meet Objective 2 of the RLDP and the core purpose of building sustainable and resilient communities for all.

20.1.2 The Primary Settlements of Abergavenny, Chepstow and Monmouth are market towns, providing a broad range of facilities and services, of which retailing is a key component, for residents and visitors. The centres attract significant numbers of shoppers from their respective town and rural hinterlands. The towns are also main visitor destinations in the County, providing a range of leisure, tourism and cultural facilities. Caldicot town centre has a more limited offer than the other primary settlements, although it remains an important centre serving the area with a range of facilities. Monmouthshire County Council, with the support of key stakeholders such as Caldicot Town Council, Cardiff Capital Region and Welsh Government, is implementing an ambitious town centre regeneration project in Caldicot. Caldicot benefits from a number of tourist attractions such as Caldicot Castle and Country Park, Black Rock and the Gwent Levels.

20.1.3 The minor county towns of Usk and Magor also provide an important role in the hierarchy. These towns serve a more local function for residents, with a prominent focus on convenience (food) shopping and an element of comparison (non-food) shopping, together with some local service provision.

20.1.4 The local centres of Raglan and Bulwark provide an important day-to-day function for their communities providing convenience shops and local services that are easily accessible.

20.1.5 Neighbourhood centres and shops similarly provide an important day-to-day function for their local communities. These facilities are located in Abergavenny, Caldicot, Chepstow and Monmouth.

Strategic Policy S14 - Town, Local and Neighbourhood Centres

All new or enhanced retail, commercial and social developments, including leisure, cultural and entertainment uses, will be focused in accordance with the hierarchy defined below. Developments should be consistent in scale and nature with the size and character of the centre and its role in the hierarchy.

Proposals must maintain or enhance the vibrancy, vitality and attractiveness of the centre. Proposals which would undermine the vibrancy, vitality and attractiveness of the centre will not be permitted.

Town Centres:	Abergavenny, Caldicot, Chepstow, Monmouth
Minor County Town Centres:	Usk, Magor
Local Centres:	Raglan, Bulwark
Neighbourhood Centres:	
Abergavenny:	Hillcrest Road, Rother Avenue and Hereford Road
Caldicot:	West End
Chepstow:	The Old Farm Shopping Centre, Thornwell and Larkfield Business Estate
Monmouth:	Overmonnow, Wyesham, The Albion and Monmouth District Centre

20.1.6 The Monmouthshire Town Centre/Retail Study 2024 provides further detail on the role and function of the centres listed in Policy S14. The Retail Study found the County's centres are performing well with an encouraging share of comparison shopping. The centres do however face competition from nearby centres in the subregion including Cardiff, Bristol, Newport, Cwmbran and Hereford. Key findings of the study identify that Monmouthshire's centres are

vulnerable to out-of-town developments and should be protected as principal destinations for main food shopping and comparison trips. The report also recognises that there is growth in service uses that provide further opportunities to maintain and enhance the vitality, attractiveness and viability of our centres. It also notes that regeneration initiatives and environmental improvements play an important role in increasing the attractiveness and appeal of our centres to residents and visitors. The Retail Study has informed the retail and commercial centres policy framework.

20.2 Central Shopping and Commercial Areas

20.2.1 While the predominance of retail (A1 uses) is vital and should continue to underpin retail and commercial centres, it is only one of the factors that contribute towards their vibrancy and viability. This approach is echoed in PPW where it notes centres are distinguished by a diversity of activity and uses which should contribute towards a centre's well-being and success, whilst also reducing the need to travel. It is recognised that commercial uses, including leisure and community uses, play a key role in supporting the vitality and viability of centres. These uses include (but are not limited to) cinemas, theatres, galleries, libraries, health centres, community hubs, gyms/other fitness uses and children's play centres. These commercial uses along with food and drink uses, such as restaurants and cafes, can benefit retail and commercial centres, extending the offer and contributing to successful and lively centres during both the day and evening.

20.2.2 The aim of Policy RC1 is therefore to encourage a diversity of uses within the County's central shopping and commercial areas, provided any such uses would not undermine vitality, attractiveness or viability of centres.

Policy RC1 – Central Shopping and Commercial Areas

Central Shopping and Commercial Areas (CSCAs) are designated for Abergavenny, Caldicot, Chepstow, Monmouth, Magor and Usk. Within CSCAs (except for Primary Shopping Frontages) the following policy criteria apply, subject to detailed planning considerations:

a) Development will be permitted where the proposal relates to a retail or commercial use which will safeguard the vitality, attractiveness and viability of the defined CSCAs;

b) Change of use at ground floor level to uses other than retail or commercial will not be permitted unless it can be demonstrated that the vitality and viability of the CSCA will not be adversely affected;

c) Change of use of ground floor premises to residential will not be permitted unless evidence is provided to demonstrate that the premises is not viable for retail or commercial use, including that the premises has been vacant for at least one year and that genuine attempts at marketing the existing use have been unsuccessful;

d) The loss of car parking within CSCAs will be resisted, unless it can be demonstrated that the proposal is linked to a town centre regeneration scheme and sufficient parking is available.

20.2.1 Residential uses can help increase vitality and viability of commercial centres and will be supported on upper floors. Residential uses may also be permitted on ground floors where premises have been left vacant for over a year, as long as it can be demonstrated that the proposal would not impact on the vitality, attractiveness and viability of the centre. Marketing evidence will be required for any such proposals, and it must be demonstrated that the property has been actively marketed as a commercial use in an appropriate manner for at least a year prior to the submission of an application. A marketing report must be submitted to support any planning application and at a minimum should include sales particulars and information from sales / letting agents with any feedback to date, along with details of the market needs of a particular area. Further scrutiny will be given to properties with an existing shopfront where a change of use of a ground floor is proposed to a residential use.

20.2.2 Given the predominantly rural nature of Monmouthshire it is recognised that many residents and visitors travel by car to the County's Town Centres. Car parks have a direct functional relationship with the CSCAs, particularly short stay car parks. Loss of car parking within centres could impact the amount of people visiting these areas and have a resultant negative impact on their vitality and viability. A number of car parks are therefore located within the designated CSCAs and the loss of car parking for alternative uses will be resisted, unless it can be demonstrated that the proposal is linked to a town centre regeneration scheme and, sufficient car parking is available to serve the centre.

20.3 Primary Shopping Frontages

20.3.1 Primary Shopping Frontages (PSF) have been designated to cover those areas of the County's main town centres where retail uses (Use Class A1) predominate. Primary Shopping Frontages relate only to the ground floor level of premises. Clusters of retail uses can contribute significantly to the vitality, attractiveness and viability of town centres. It is therefore essential that the retail core of the County's Town Centres is protected and that developments which undermine this function are resisted.

20.3.2 Policy RC2 therefore gives priority to retail (A1 uses) in the identified Primary Shopping Frontages and seeks to protect the predominant shopping role/character of the centres by controlling the loss of retail uses in the PSF.

Policy RC2 – Primary Shopping Frontages

Primary Shopping Frontages are designated in Abergavenny, Caldicot, Chepstow and Monmouth in the following locations:

Abergavenny
PSF1 Cross Street, High Street & Frogmore Street
PSF2 Cibi Walk

Caldicot
PSF4 Newport Road (17-41 & 26-32 & Holman House)

Chepstow
PSF5 High Street (2-23 & 24-29)

PSF6 St Mary Street

Monmouth
PSF7 Monnow Street (1-93 & 6-114)
PSF8 Church Street & Agincourt Square

Within Primary Shopping Frontages, development or redevelopment proposals for non-A1 commercial uses on ground floors, or a change of use on ground floors from Use Class A1 to non-A1 commercial uses, will only be permitted where all of the following apply:

a) It retains or delivers an active shopfront;

b) The use would not create an over-concentration or unacceptable balance of non-A1 uses that would disproportionately dilute the continuity of the primary shopping frontage detracting from its established retail character;

c) It would not result in the loss of A1 retail units in prominent locations, corner units or those with long frontages.

Where a proposal fails to meet all of the above criteria, an exception may be considered provided:

i) It can be demonstrated that the proposed use would not harm the vitality, attractiveness and viability of the street frontage; and

ii) The premises have been vacant for at least a year, genuine attempts at marketing the existing use have been unsuccessful, and the proposal would bring a vacant premises back into an active commercial or community use.

A justification statement must be submitted to provide evidence for all proposals considered to be exceptions.

20.3.3 The way town centres function has changed significantly in recent years and will continue to evolve. However, there is a need to ensure that the heart of commercial centres dominated by retail units is not lost to other uses, as large numbers of retail units in close proximity to each other are important to the attractiveness of centres, by providing convenience to shoppers. There is nevertheless a need to strike a balance between A1 retail uses and complementary non-A1 commercial uses in centres as a whole through provision of an optimal mix to ensure vitality, attractiveness and viability of centres. Accordingly, the Primary Shopping Frontages have been reduced where appropriate to ensure the focus of PSFs is on the retention of retail uses, while allowing appropriate non-retail uses in the CSCAs. The minimum proportion of A1 commercial uses that the Council consider appropriate in each of the identified Primary Shopping Frontages will be set out in Supplementary Planning Guidance. Proposals that would result in the proportion of non-A1 retail uses at ground floor level exceeding the identified threshold will only be permitted in the exceptional circumstances listed in Policy RC2.

20.3.4 In order to assist in the application of the criteria, an annual retail health check is undertaken and presented in the Retail Annual Monitoring Report. This information will be used to maintain an accurate record of the types of uses within individual premises. This data will also

be utilised to determine the appropriate thresholds of A1 uses within the individual Primary Shopping Frontages which will be set out in Supplementary Planning Guidance.

20.3.5 Consideration will be given to location and prominence of premises, in that there will be a presumption against the loss of A1 retail units in prominent locations, corner units or those with long frontages. It is also important to ensure that the non-A1 units, in terms of number, frontages lengths and distribution, do not create an over concentration of such uses which detract from the established retail character of the primary shopping area.

20.3.6 Particular scrutiny will be given to the assessment of proposals for A3 uses within PSFs. While it is recognised that cafes and restaurants play an important social role in centres complementing retail uses, hot food take away premises and bars that are closed during the day make a limited contribution to the vitality of retail and commercial centres. These are instead more appropriately directed to the wider CSCA.

20.3.7 The Council does not wish to see shops remaining vacant for a long period of time. Nevertheless, with regard to proposals for a change of use to non-A1 commercial uses it must be demonstrated that the property has been actively marketed for retail use in an appropriate manner for at least a year prior to the submission of an application. A justification statement must be submitted along with a marketing report to support any planning applications for non-A1 commercial uses and at a minimum should include sales particulars and information from sales / letting agents with any feedback to date, along with details of the market needs of a particular area.

20.4 Local Centres and Neighbourhood Centres/Shops

20.4.1 It is recognised that outside of identified town centres there are a number of other smaller centres/shops that play an important role in resident's everyday lives. Policy RC3 seeks to maintain and strengthen the role and function of local centres and neighbourhood centres/shops by focusing retail and complimentary commercial uses of an appropriate scale and nature within them.

Policy RC3 – Local Centres and Neighbourhood Centres/Shops

The County's local centres, neighbourhood centres and shops are defined in Strategic Policy S14 and are identified on the Proposals Map.

Development proposals for A1 retail development in designated local centres and neighbourhood centres will be permitted provided that the development, either individually or cumulatively with other recent or proposed developments, does not undermine the vitality, attractiveness or viability of town centres.

Proposals for A1, A2, A3 and other complementary commercial uses will be supported in local and neighbourhood centres where they are in keeping with the scale, role and function of the individual centre.

Proposals that would result in the loss of A1, A2, A3, or commercial uses within local centres and neighbourhood centres will not be permitted unless genuine attempts at marketing the existing use have been unsuccessful.

20.5 New Retail Proposals

20.5.1 A town centre first approach is fundamental in relation to the location of proposals for new retail and commercial development, in accordance with national policy guidance set out in PPW12 and Future Wales 2040. Policy RC4 seeks to focus future retail and commercial development in the County's designated Central Shopping and Commercial Areas (CSCAs). This is considered essential in strengthening the centres role/function in the retail and commercial hierarchy, reinforcing their attractiveness to local communities and visitors and in maintaining and enhancing their vitality and viability. The policy also supports sustainability objectives by focusing such facilities in accessible locations in accordance with the Sustainable Transport Hierarchy.

Policy RC4 – New Retail Proposals Outside of Identified Town and Local Centres

The preferred location for new retail and commercial uses, including extensions to existing retail and commercial premises, will be in the designated Central Shopping and Commercial Areas (CSCAs) and Local Centres. Where it can be demonstrated that no suitable sites exist in the CSCA/local centre, then sites on the edge of the CSCA/local centre should be considered before finally considering out-of-town sites. Development proposals outside these areas will be required to be assessed against the following criteria:

a) A demonstrable need exists for the proposed development;

b) The proposed development, either individually or cumulatively with other recent or proposed developments, would not have a detrimental impact on the trade/turnover, vitality and viability of town, local or neighbourhood centres;

c) The proposed development is of an appropriate scale and type to the size, character and function of the centre and its position in the retail and commercial hierarchy;

d) The proposed development would not have a detrimental impact on future public or private investment needed to safeguard vitality and viability of the centres;

e) The proposal is in a location accessible by sustainable travel;

f) The proposal is not on land allocated for other uses. This especially applies to land designated for industry, employment and housing, where retail and commercial development can be shown to limit the range and quality of sites for such uses.

Retail Impact Assessments will be required for retail and commercial developments outside the centres identified in the retail and commercial hierarchy in Strategic Policy S10, the content of which should be proportionate to the potential impact of the proposed use. The following floorspace thresholds will apply:

g) Outside the CSCAs of Abergavenny, Caldicot, Chepstow & Monmouth – 500 sq.m gross

h) Outside the CSCAs of Usk & Magor – 250 sq.m gross

i) Outside the Local Centres of Raglan & Bulwark – 150 sq.m gross

20.5.2 This policy sets out the criteria against which proposals for retail and commercial development outside CSCAs and local centres, as identified on the Proposals Map, will be assessed. This policy relates to all new retail and commercial development including redevelopment, extensions, subdivision and changes of use class. It also contributes to protecting/enhancing designated CSCAs and local centres by resisting out-of-town development that could be detrimental to such centres, and any associated regeneration schemes to improve their vitality, attractiveness and viability.

20.5.3 All such retail and commercial proposals must comply with criteria a) to f) however, retail impact assessments are only required for those developments over the thresholds identified in Policy RC4.

20.6 Local Shops

20.6.1 The importance of the local shop is essential to many communities, particularly for those in rural areas. It is recognised that outside of identified centres there are a number of other shops that play an important role in resident's everyday lives. Existing shops and facilities in such locations are therefore protected in the policy framework set out Policy CI1 Community Facilities. In addition to this, Policy S15 provides support for new local shops as community facilities. Proposals for local shops outside of the County's retail centres must be for less than 150 sq.m gross to ensure compliance with Policy S14 and RC4.

S14 - Links to Wider Policy Framework	
RLDP Objectives	Objective 1 – Economic Growth/ Employment Objective 2 – Town and Local Centres Objective 8 – Health and Well-being Objective 9 – Demography Objective 11 – Place-making Objective 12 – Communities Objective 13 – Rural Communities Objective 14 – Infrastructure Objective 15 – Accessibility Objective 16 – Culture, Heritage and Welsh Language
Future Wales: The National Plan 2040 (WG, February 2021)	Policy 6 – Town Centre First
Planning Policy Wales Edition 12	Active and Social Places Theme (Chapter 4) - Retail and Commercial Development

(WG, February 2024)	
Well-being of Future Generations Act (WBFGA) (WG, 2015)	A prosperous Wales A resilient Wales A more equal Wales A Wales of cohesive communities A Wales of vibrant culture and thriving Welsh language
Gwent PSB Well-being Plan (August 2023)	• Take action to address inequities, particularly in relation to health, through the framework of the Marmot Principles. • Take action to reduce the cost-of-living crisis in the longer term. • Enable and support people, neighbourhoods, and communities to be resilient, connected, thriving and safe.
Taking Monmouthshire Forward - Community and Corporate Plan 2022 - 2028 (April 2023)	This policy supports the Community and Corporate Plan and in particular, high-level objectives that state Monmouthshire will be: • A Thriving and ambitious place, where there are vibrant town centres, where businesses can grow and develop; • A Connected place where people feel part of a community and are valued.
Key Evidence	Primary Shopping Frontages SPG – April 2016 TAN 4: Retail & Commercial Development – Nov 2016 Retail Background Paper – January 2024 Monmouthshire Town Centre/Retail Study February 2024

Community Infrastructure

21. Community and Recreation Facilities

Strategic Policy S15 – Community and Recreation Facilities

Development proposals that provide and/or enhance community and recreation facilities will be permitted within or adjoining settlement boundaries subject to detailed planning considerations.

Development proposals that result in the unjustified loss of community and recreation facilities will not be permitted.

21.1.1 The Council is committed to protecting and enhancing community and recreation facilities, including open spaces, allotments and community growing areas and Areas of Amenity Importance to meet the needs of residents over the Plan period. Strategic Policy S15 therefore provides support for new proposals and the protection of existing facilities and spaces.

Community and Recreation Facilities

21.1.2 Providing a range of community facilities which are accessible to as many people as possible is essential in developing sustainable, resilient and inclusive communities. Such facilities are valuable in terms of the amenities they provide, the employment they generate and in attracting people to live within an area.

21.1.3 For the purpose of this policy, community facilities are defined as facilities used by local communities for leisure, social, health, education and cultural purposes and include:

- Village halls/ Community hubs
- Village shops/post offices
- Schools, educational and training facilities
- GP surgeries / health and well-being centres
- Leisure centres and leisure facilities such as Theatres and Cinemas
- Allotments/ community food growing
- Public houses
- Places of worship
- Indoor facilities, such as libraries
- Cemeteries

21.1.4 Community facilities can be owned by the public, private or community groups. Such facilities can be considered appropriate in residential and non-residential areas, where they satisfy the relevant planning policies, as they serve the needs of the wider community. Whilst there is a general presumption in favour of community facilities, they should not erode the character and appearance of the natural and built environment, nor the design qualities of their location. Any proposals for community facilities must also be of a scale appropriate to the settlement they are proposed in. New facilities need to have good access to public transport and active travel routes, as well as be in walkable distance to as many homes as possible. Proposals that involve the loss of community facilities will be assessed against the criteria Policy CI1.

21.1.5 Recreation facilities include formal sport, recreation and leisure pursuits such as team games, children's play facilities, as well as more informal activities such as walking in the countryside. Recreation and leisure facilities are an important generator of tourism and, in practice, the difference between facilities for local residents and tourists is difficult to define. However, for the purposes of the Plan, policies which relate to recreation and community facilities refer to activities primarily undertaken by local residents as opposed to the more tourist related activities associated with visitors. Policy CI2 sets out the standards for recreation facilities (formal outdoor space) provision and Policy CI3 sets out the criteria which proposals that involve the loss of recreation facilities will be assessed against.

Allotment and community food growing

21.1.6 Allotments and community food growing facilities provide a valuable recreational resource and can improve the quality of life for communities. The Council is therefore committed to their retention, enhancement and provision. Given that the demand for allotments and community food growing may increase over the Plan period, proposals to develop further facilities in the County will be favourably considered. The Council has adopted a Local Food Strategy (2024) which sets out objectives and ways to deliver community growing projects, which the RLDP Framework supports. Policy CI2 sets out the standard for allotment and community food growing provision.

Public Open Spaces and Areas of Amenity Importance

21.1.7 The Council is committed to providing, protecting and enhancing open spaces in the County that are important for recreation, amenity, biodiversity, connectivity and/or heritage. Access to areas of public open space is essential in enhancing the quality of life for all and promoting sustainable and resilient communities. It can help foster social inclusion, assist in healthier

lifestyles and allow for recreation and leisure activities. It is important that an accessible network of open space and amenity areas are protected, maintained and improved. Policy CI2 sets out the standards for public open space and Policies CI3 and CI4 set out measures for the protection of public open space and designated Areas of Amenity Importance (AAI) respectively.

21.2 Retention of Existing Community Facilities

21.2.1 As recognised in Strategic Policy S15, community facilities are essential in promoting the health and wellbeing and sustainability of local communities, including our rural communities where community facilities provide an essential service to local residents. It is important, therefore, that development proposals or changes of use do not result in the loss of community facilities. Policy CRF1 seeks to protect and retain existing community facilities in Monmouthshire's towns and villages.

Policy CI1 – Retention of Existing Community Facilities

The change of use or conversion of neighbourhood or village shops, halls, public houses and other community facilities to other uses will only be permitted where all of the following criteria are met:

a) The local community would continue to be adequately served by facilities to which there is convenient access by sustainable travel;

b) Evidence is provided that the existing use is no longer viable. In respect to commercially operated facilities evidence must be provided that the facility is no longer financially viable;

c) Evidence is provided that appropriate marketing of the facility, whether in use or vacant, has been unsuccessful.

21.2.2 In some instances, a community facility may be an isolated resource where there is no comparable facility, which is often the case in rural locations. Rural village shops and public houses for example, provide a vital service and social function for communities. As such, the Council will seek to protect these facilities through the careful consideration of planning applications that have a detrimental impact on their continued existence.

Viability

21.2.3 The viability of a facility as a business, such as a local shop or public house, will be material to the assessment of a proposal for change of use or redevelopment. The Council, as set out in criterion b), will require the submission of evidence that demonstrates the current financial status of a facility. Details of the information to be provided would be subject to discussions between the Council and the applicant and will be dependent on the nature of the business. The information must, however, be sufficient to enable an adequate assessment of whether an alternative occupier could maintain a financially viable business at the site.

21.2.4 Establishing viability is not exclusively a financial issue. Community facilities that are non-profit making, such as village halls, health centres and places of worship, will require an assessment of non-financial matters in order to establish ongoing viability. This includes for example, an

assessment of patronage/attendance levels, the prevalence of other similar facilities in the area and the suitability of the location.

Marketing

21.2.5 Evidence that appropriate marketing and advertising has been carried out to secure the sale of the premises for the existing established use will be required. This marketing period should be for a minimum of 12 months and would be expected to use appropriate property agents in the locality.

21.2.6 The Council is likely to seek independent professional advice from a commercial property valuer with regard to establishing the market value of a property and the efficacy of any marketing exercise. Such professional advice would also be useful where the facility has been vacant for a number of years in providing an assessment of potential demand for the facility both locally and in relation to general market conditions.

21.3 Provision of Formal and Informal Open Space, Allotments and Community Food Growing

21.3.1 The provision of formal and informal open space, allotments and community food growing, and/or contributions towards improving existing areas of open space, allotments and community growing areas will be sought in connection with new residential developments where they are needed and justified. This approach will help create sustainable developments that cater for the community's needs as well as promoting sustainable mixed-use developments that facilitate access via public transport, walking and cycling.

21.3.2 Policy CI2 sets out the standards for formal and informal open spaces, allotment and community growing provision. For the purposes of this policy, open space is defined in accordance with TAN16 Sport, Recreation and Open Space (2009). This sets out the Fields in Trust (FIT) standard, which is categorised into: formal spaces such as playing fields, outdoor sport courts and children's play areas; and informal spaces, such as parks, communal green spaces and infrastructure, woodland and scrubland areas.

21.3.3 Local Authorities are required to provide allotments for their residents if they consider there is demand under section 23 of the 1908 Allotments Act (as amended). The FIT standard sets out the median level of provision for allotments, community gardens and urban farms in Wales as 0.3 hectares per 1,000 population. The Council will use this standard for such provision.

Policy CI2 – Provision of Formal and Informal Open Space and Allotments / Community Growing Areas

New development proposals will be assessed against the Council's standards for formal outdoor space, informal outdoor space, allotments and community growing, as set out below:

	Open Space Typology	Quantity Guideline (hectares per 1,000 population)	Definition

FORMAL OPEN--SPACE	Playing pitches	1.2 ha	Sports pitches including football rugby, hockey, lacrosse, cricket and American football
	All outdoor sports	1.6 ha	Courts and greens comprising natural or artificial surfaces, including tennis courts, bowling greens, athletics tracks and other outdoor sports areas
	Equipped/designated play areas	0.25 ha	Local Area for Play (LAP) and Locally Equipped Areas for Play (LEAP) aimed at children who can play independently, as well as Neighbourhood Equipped Areas of Play (NEAP)
	Other outdoor provision	0.3ha-*	All weather multi-use games areas (MUGA) including skateboard parks
	Sub total	3.35ha	
INFORMAL OPEN SPACE	Parks and gardens	0.8ha	Green spaces including urban parks, country parks, forest parks and formal gardens
	Amenity green space	0.6ha	Informal recreation spaces, public squares, communal green spaces in and around housing, village greens
	Natural and semi-natural space	2.0ha	Woodland, scrub, grassland and open access land

	Sub total	3.4ha	
ALLOTMENTS & COMMUNITY GROWING	Allotments & Community growing	0.3ha	Allotments, community gardens and community orchards

21.3.4 The Council has undertaken an Open Space Audit. This assesses the quantity of formal and informal public open space provision within the County and compares this provision with the benchmark standards endorsed by FIT.

21.3.5 The Open Space audit findings can be used as a means of justifying the provision of new recreational facilities and/or remedying local deficiencies in provision. It can also be used as a means of safeguarding and enhancing existing facilities as appropriate. It can also assist in providing the evidence and justification in seeking S106 financial obligations from developers where new housing development increases local recreational need.

21.3.6 It should be noted that the Open Space audit represents a quantitative analysis of open space in the County. Other considerations relating to accessibility, proximity to and the quality of existing provision have not been assessed.

21.3.7 Any provision should be well related to the development that it is intended to serve, however, where some of the provision needs to be made off-site a financial contribution may be appropriate to allow facilities to be provided or improved in a suitable location nearby. For example, in relation to equipped/fixed play and designated areas of play having numerous small play areas provided within new development sites that are devoid of any real play value to children and young people is not desirable, and in these circumstances it is the Council's preference for improvements to destination play areas in the locality. A cabinet report was endorsed by Council in January 2020 in relation to this approach to fixed play assessments and provision.

21.3.8 Developers are encouraged to maximise the functionality of public open spaces by considering opportunities for biodiversity net gain, ecological connectivity, SUDS and active travel. Recreational facilities should not be included within areas of SUDS.

21.4 Safeguarding Existing Recreational Facilities, Public Open Space and Allotments / Community Growing

21.4.1 In accordance with Policy S15, Policy CI3 seeks to protect recreation facilities, public open spaces and allotment and community growing uses in the County from development to other land uses. This policy does not cover designated Areas of Amenity Importance, which are protected in Policy CI4 below.

Policy Policy CI3 – Safeguarding Existing Recreational Facilities, Public Open Spaces and Allotments / Community Growing

Development proposals that involve the loss of land and facilities with recreational, open space, allotments and community growing uses will only be permitted where:

a) Alternative provision of at least equivalent community benefit is made available in the locality by the developer on a site acceptable to the local planning authority; or

b) There is, and would be, an excess of accessible recreational facilities, public open space and allotments/community growing areas in the locality having regard to the standard as set out in Policy CI2.

21.5 Areas of Amenity Importance

21.5.1 Across Monmouthshire Areas of Amenity Importance (AAI) play an important role in the built environment by enhancing the quality of life and the health and well-being of residents. They also provide benefits through their contribution to ecology, recreation, the cultural/historic environment, landscape and wider environmental benefits. Areas of Amenity Importance are identified on the Proposals and Inset Maps.

21.5.2 A review of AAI has been undertaken as part of the RLDP evidence base. The audit includes an assessment of Formal and Informal Recreational Space (exclusions include golf courses, recreational water bodies, indoor sports, leisure centres or car parks associated with recreational uses), Equipped Children's Play Areas along with Amenity Open Space.

21.5.3 Areas of Amenity Importance often come under pressure for development. There are limited opportunities outside of site allocations to increase the amount of recreational and open space, and therefore it is imperative that existing AAIs are preserved and protected from loss and inappropriate development.

21.5.4 Proposals that are complementary to the use/function of an AAI and would not lead to the loss of an AAI, such as outdoor sports facilities and amenity blocks (where there is a proven need and these support the existing function of the AAI), public toilets, active travel routes, drainage infrastructure and, upgrades to equipment already present on sites, may be considered appropriate. Site promoters must provide evidence in any proposals on AAIs to demonstrate that there would be no adverse impact of development on the function that the AAI fulfils.

Policy CI4 – Areas of Amenity Importance

Areas of Amenity Importance are identified on the Proposals Map. Development proposals that lead to the loss of Areas of Amenity Importance will not be permitted.

S15 - Links to Wider Policy Framework	
RLDP Objectives	Objective 3 –Green Infrastructure, Biodiversity and Landscape Objective 8 – Health and Well-being Objective 9 – Demography Objective 11 – Place-making Objective 12 – Communities Objective 14 – Infrastructure Objective 15 – Accessibility
Future Wales: The National Plan 2040 (WG, February 2021)	Policy 2 – Shaping Urban Growth and Regeneration – Strategic Placemaking Policy 4 – Supporting Rural Communities Policy 6 – Town Centre First Policy 34 – Green Belts in the South East
Planning Policy Wales Edition 12 (WG, February 2024)	Active and Social Places Theme (Chapter 4) - Community Facilities Recreational Spaces
Well-being of Future Generations Act (WBFGA) (WG, 2015)	A healthier Wales A more equal Wales A Wales of cohesive communities A Wales of vibrant culture and thriving Welsh Language
Gwent PSB Well-being Plan (August 2023)	• Take action to reduce our carbon emissions, help Gwent adapt to climate change, and protect and restore our natural environment. • Taking action to address inequalities, particularly in relation to health, through the framework of the Marmot Principles. • Enable and support people, neighbourhoods, and communities to be resilient, connected, thriving and safe.
Taking Monmouthshire Forward - Community and Corporate Plan 2022 - 2028 (April 2023)	This policy supports the Community and Corporate Plan objectives of ensuring Monmouthshire is a: • Fair place to live where the effects of inequality and poverty have been reduced. • Green place to live and work, with reduced carbon emissions, and making a positive contribution to addressing the climate and nature emergency. • Connected place where people feel part of a community and are valued.
Key Evidence	TAN 16: Sport, Recreation and Open Space

	Fields in Trust: Guidance for outdoor sport and play: Beyond the six acre standard (2017) Monmouthshire Local Food Strategy (2024)

Minerals

22. Minerals

22.1 Sustainable Minerals Management

Strategic Policy S16 – Sustainable Minerals Management

The Council will sustainably manage its mineral resources by:

i) Safeguarding known/potential land won sand and gravel, sandstone and limestone resources for future possible use;

ii) Maintaining a minimum 10-year bank of crushed rock reserves throughout the Plan period in line with the requirements of the latest South Wales Regional Aggregates Working Party Regional Technical Statement on Aggregates; and

iii) Encouraging the efficient and appropriate use of high-quality minerals and maximising the potential for the use of secondary and recycled aggregates as an alternative to primary won resources.

22.1.1 In accordance with national and regional policy requirements, the RLDP encourages a sustainable approach to minerals planning. This seeks to ensure that valuable finite resources are safeguarded for possible future extraction and that the use of secondary and recycled aggregates is maximised in preference to primary aggregates.

22.1.2 Future Wales recognises minerals as a policy area requiring a co-ordinated framework through the preparation of a Strategic Development Plan (SDP). Progress on the preparation of an SDP for the South East Wales region will continue to be monitored as the Plan progresses. PPW12 and Minerals Technical Advice Note 1: Aggregate (2004) (MTAN1) require Local Planning Authorities to make provision for a minimum of land bank of 10 years for crushed rock and 7 years for land-based sand and gravel throughout the full 15 years of a development plan period. To establish these requirements MTAN1 requires the preparation of Regional Technical Statements (RTS) for the areas covered by both the South Wales and North Wales Regional Aggregates Working Parties (RAWPs).

22.1.3 A revised RTS – 2nd Review for South Wales[42] was published in September 2020 and endorsed by the Minister for Energy, Planning and Rural Affairs in March 2021. The revised RTS makes recommendations for the apportionment necessary to ensure an adequate supply of crushed rock and sand and gravel, including the nationally recommended minimum provision of 10 and 7 years respectively, are available for the entire duration of the RLDP. The total apportionments for Monmouthshire are zero for land-won sand and gravel and 6.05 million tonnes for crushed rock, specifically Limestone in Monmouthshire case. These compare with existing landbanks (excluding dormant sites) of zero for sand and gravel, and 11.25 million tonnes for crushed rock (as of 31st December 2016), reflecting the significant permitted reserves of Limestone at

[42] Regional Technical Statement – Second Revision main report – Final September 2020 and South Wales Appendix B - and Welsh Government RTS Clarification Letter – 11th November 2021

the Ifton Quarry. When compared against the apportioned requirement as set out in the RTS2, Monmouthshire has a surplus of provision and therefore the RTS (2nd Review) does not require Monmouthshire to make allocations within the RLDP.

22.1.4 On a regional basis Monmouthshire forms part of the former Gwent sub-region along with Torfaen, Newport and Blaenau Gwent. Within the sub-region there is an overall shortfall of reserves. The RTS2 notes that in view of the shortfall in the sub-region, the former Gwent sub-region may need to work in collaboration in order to meet the combined requirements for the sub-region as a whole. Monmouthshire has undertaken a Limestone Aggregate Resource Assessment (January 2024) to inform options for meeting the sub-region apportionment. The assessment reviews the mineral resource safeguarding maps against a series of constraints in the County including SSSIs, predictive agricultural land classifications, and ancient woodland. The report concludes that given the constraints associated with Monmouthshire, potential does not exist at this stage to meet some or all of the carboniferous limestone apportionment/allocation required for the wider former Gwent sub-region. We will continue to work in partnership with the other authorities in the sub-region to explore options for meeting the RTS2 apportionments.

22.1.5 Policy S16 seeks to ensure that best use of high-quality mineral resources is achieved and is not used for a lower grade purpose than intended. The increased use of alternatives to naturally occurring minerals is also promoted. The re-use and/or recycling of construction and demolition material and industrial waste serves not only to reduce the amount of waste produced but also conserves scarce resources and minimises environmental damage.

22.1.6 As noted above, there is a sufficient landbank of permitted aggregate resource in the County for the duration of the RLDP period. Should any planning application for new or extended minerals working be submitted then any such proposal would be considered under national policies contained in PPW12 and MTAN1.

22.1.7 Further detail on mineral reserves and regional monitoring arrangements are set out in the Minerals Background Paper.

22.2 Local Building and Walling Stone

Policy M1 – Local Building and Walling Stone

Proposals for new or the re-opening of small-scale quarries for building and walling stone for local conservation and heritage projects or new build to meet any unmet need will be permitted, subject to national planning policy and detailed planning considerations.

22.2.1 As noted above, applications for the working of mineral reserves will be considered under national planning policy. However, one such exception may occur when quarrying enables the provision of locally derived stone for use in restoration and new building work that reinforces the distinctiveness, character and identity of the County. Policy M1 enables this to take place, although care will be needed to ensure that proposals are small-scale, do not have a harmful impact on the countryside and do not involve the use of extensive blasting or use of heavy vehicles.

22.3 Minerals Safeguarding Areas

Policy M2 – Minerals Safeguarding Areas

Development proposals which may impact on the minerals safeguarding areas shown on the Proposals Map will be considered against the following requirements, as applicable:

a) 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.

b) Proposals for development uses of a temporary nature within identified mineral safeguarding areas will not be approved unless they can be completed and the site restored to a condition that does not inhibit mineral extraction within the timescale that the mineral is likely to be needed.

22.3.1 As set out in national planning guidance, the safeguarding of finite minerals resources is a means of preserving natural resources for future generations. This does not infer these will ever be worked and in most cases only very limited use will be made of them. It is also important to remember safeguarding also does not confer any permission/allocation for extraction/exploitation. The safeguarding areas shown on the Proposals Map relate to the British Geological Survey (BGS) Aggregate Safeguarding Map for South East Wales.

22.3.2 In most instances, development may proceed within safeguarding areas as long as developers demonstrate the resource in question is either of poor quality/quantity and would not be economical to exploit, or the nature of the development in question would not prejudice exploitation of the resource. Such consideration will normally be made at the planning application stage and should form part of any submission for approval.

22.3.3 With regard to aggregates (hard rock and sand and gravel) identified and safeguarded on the Proposals Map, the extraction of mineral resources will generally not be acceptable within 200m of identified settlements in the RLDP for hard rock and within 100 metres for sand and gravel.

22.4 Mineral Site Buffer Zone

Policy M3 – Mineral Site Buffer Zones

Development proposals for sensitive or minerals development will not be permitted within the mineral site buffer zone identified on the Proposals Map.

22.4.1 National policy requires the RLDP to safeguard permitted and allocated mineral sites from new development that would prejudice the future extraction of the reserve /resource or the operation of the site. Buffer zones aim to reduce the conflict between mineral working and other sensitive land uses as a result of noise and dust from mineral extraction / processing and vibration from blasting. No new mineral development will be permitted within the buffer zone to prevent encroachment towards sensitive land uses. Similarly, no new sensitive development will be permitted within the buffer zone both to prevent any encroachment but also to prevent an additional constraint for the mineral working. 'Sensitive development' is defined in paragraph 70 of MTAN1 as 'any building occupied by people on a regular basis and includes housing areas, hostels, meeting places, schools and hospitals, where an acceptable standard of amenity should be expected. Sensitive development could also include specialist high technology industrial development where operational needs require high standards of development'.

22.4.2 Paragraph 71 of MTAN1 requires a minimum 200 metre buffer zone around hard rock quarries. A buffer zone has therefore been drawn around Ifton Quarry as identified on the Proposals Map.

S16 - Links to Wider Policy Framework	
RLDP Objectives	Objective 1 – Economic Growth/Employment Objective 5 – Minerals and Waste Objective 6 – Land Objective 7 – Natural Resources Objective 14 - Infrastructure Objective 17 – Climate Change
Future Wales: The National Plan 2040 (WG, February 2021)	Policy 19 – Strategic Policies for Regional Planning, identifies policy areas which cut across local planning authorities and require a regional, co-ordinated planning response through the preparation of a Strategic Development Plan, including mineral extraction.
Planning Policy Wales Edition 12 (WG, February 2024)	Productive and Enterprising Places Theme (Chapter 5) - Minerals
Well-being of Future Generations Act (WBFGA)	A Prosperous Wales A Resilient Wales A Globally Responsible Wales

(WG, 2015)	
Gwent PSB Well-being Plan (August 2023)	• Take action to reduce our carbon emissions, help Gwent adapt to climate change, and protect and restore our natural environment.
Taking Monmouthshire Forward - Community and Corporate Plan 2022 - 2028 (April 2023)	This policy supports the Community and Corporate Plan objectives of ensuring Monmouthshire is a: • Green place to live and work, with reduced carbon emissions, and making a positive contribution to addressing the climate and nature emergency.
Key Evidence	Minerals Technical Advice Note 1: Aggregate (2004) (MTAN1) RTS 2nd Review published in September 2020 and endorsed by the Minster for Energy, Planning & Rural Affairs March 2021 and Welsh Government RTS Clarification Letter – 11th November 2021 National Minerals Resource Maps National Aggregates Safeguarding Maps for Wales (BGS) Minerals Background Paper – October 2024

Waste

23. Sustainable Waste Management

Strategic Policy S17 – Sustainable Waste Management

To facilitate the delivery of sustainable management of waste the Plan will:

i) Require waste proposals to conform to the principle of the waste hierarchy, supporting those that move waste up the hierarchy;

ii) Support an integrated and adequate network of waste management installations that has regard to the nearest appropriate installation concept and self-sufficiency principles where necessary;

iii) Identify suitable allocated and protected Class B2 industrial sites that are appropriate for in-building waste management treatment facilities, subject to detailed planning considerations;

iv) Support the circular economy by encouraging the minimisation of waste production and the use of reused and recycled materials in the design, construction and demolition stages of development; and

v) Ensure that provision is made for the sustainable management, sorting, storage and collection of waste in all new development.

23.1.1 The planning system has an important role to play in facilitating sustainable waste management. Welsh Government's policy for waste management is set out in 'Towards Zero Waste' (2010) and associated Sector Plans. Local authorities are required to develop a sustainable approach to the management of waste, including the support of proposals which move the management of waste up the waste hierarchy, with waste prevention and re-use at the top of the hierarchy, followed by preparation for re-use, recycling, recovery and finally disposal.

23.1.2 The Collections, Infrastructure and Markets Sector Plan (CIMSP) sets out the waste management framework considered to provide the best solutions to meet environmental, social and economic needs in Wales to 2050. The CIMSP requires the provision of an integrated and sustainable network of waste facilities. The 'Nearest Appropriate Installation' concept and the principle of self-sufficiency will only be applicable in relation to mixed municipal wastes (covered by Article 16 of the revised Waste Framework Directive).

23.1.3 Future Wales recognises waste as a policy area requiring a co-ordinated framework through the preparation of a Strategic Development Plan (SDP). Progress on the preparation of an SDP for the South East Wales region will continue to be monitored throughout the Plan period. In the meantime, PPW12 and TAN 21: Waste, establish regional monitoring arrangements to inform the preparation of LDPs and assist in the determination of planning applications. The 2018-2019 South East Wales Waste Monitoring Report (published 2020) concludes that there is currently no need for additional landfill capacity within the South East Wales region. In addition, the report advises that any new proposal for further waste treatment should be

carefully assessed to ensure that overprovision does not occur within the region. As such, no specific need for such waste management facilities has currently been identified at a regional level.

23.1.4 At a local level, Monmouthshire has a number of partnerships in place to deal with its municipal waste.

- Residual Municipal Waste- Monmouthshire is a member of Project Gwyrdd, a residual waste procurement partnership made up of five local authorities, (Caerphilly, Cardiff, Monmouthshire, Newport and the Vale of Glamorgan) who have entered into a long-term contract with Viridor Waste Management Ltd to treat municipal residual waste at their Energy from Waste Facility at Trident Park in Cardiff.
- Food Waste- this is dealt with via a long-term procurement partnership involving Bridgend, Blaenau Gwent, Monmouthshire and Torfaen with the Severn Trent Water Anaerobic Digestion Facility at Stormy Down, near Porthcawl.
- Garden Waste – Monmouthshire has a medium-term contract with Abergavenny Green Waste Company.
- Recycled Waste – is bulked and sent to reprocessors across the UK.
- Residual Commercial Waste – this is bulked and treated as part of the Project Gwyrdd arrangements.
- Trade Waste – Monmouthshire County Council also offer a trade collection service for residual waste, which is recycled in the same way as municipal recycled waste.
- Landfill – Less than 1% of waste from Monmouthshire goes to landfill, with the facilities used depending on where the reprocessing of material takes place.

(Source: MCC Neighbourhood Services Section)

23.1.5 TAN 21: Waste, notes that many general employment sites and major industrial areas are likely to be suitable locations for waste facilities[43]. Details of those employment land allocations that are considered potentially suitable for the provision of waste management facilities are set out in Policy W3, subject to the detailed criteria-based policies contained throughout the Plan, against which planning applications for waste management facilities will be assessed.

23.1.6 Developments should, where possible, minimise the production of waste in the development process through the use of secondary and recycled aggregates as part of the construction process in accordance with the circular economy principle.

23.1.7 It is also important that new developments facilitate sustainable waste management options for the people living in and using new developments once complete. This Policy aims to encourage the recycling of waste materials by the provision of adequate facilities for the storage and collection of waste and separation at source. Waste related considerations should be taken into account in the design of the development so that they are properly integrated into it, and fully accessible to collection vehicles.

[43] Paragraph 3.19 of TAN 21: Waste (2014)

23.2 Waste Management Facilities

Policy W1 – Waste Management Facilities

Proposals for waste management facilities, except those involving the final deposit of waste on land at the site or open windrow composting, will be permitted within industrial sites (Class B2 of the Town and Country Planning Use Classes Order 1987) subject to detailed planning considerations, other RLDP policies and national and regional considerations.

Where such proposals cannot be accommodated on existing or proposed Class B2 industrial sites they will be permitted provided that all the following conditions are met:

a) The proposal site is within settlement boundaries or existing and proposed industrial/business sites; and

b) There is a demonstrable need for the type and scale of development in that location.

All proposals for waste management facilities should also comply with the following criteria:

i) Where energy is recovered as part of the waste management process the means of access to the appropriate national grid or identified end user is demonstrated;

ii) Where appropriate, the maximum possible use is made of non-road transportation for the receipt of the waste arisings and the distribution of the output products;

iii) There is no processing and no substantial storage of waste material in the open air; and

iv) The proposals are compatible with adjoining land uses.

Development of sustainable waste management facilities in appropriate open countryside locations, including open windrow composting and anaerobic digestion, will be supported subject to detailed planning considerations.

23.2.1 Strategic Policy S17 seeks to provide a choice of sites to meet Welsh Government's requirement for the 'establishment of an integrated waste management network' by designating allocated and protected class B2 industrial sites as being potentially suitable for in-building waste management facilities. Advances in technology and the introduction of new legislation, policies and practices mean that many modern waste management / resource recovery facilities on the outside look no different to any other industrial building and on the inside contain industrial de-manufacturing processes or energy generation activities that are no different to many other modern industrial processes in terms of their operation or impact. Some waste operations such as open windrow composting and anaerobic digestion may, however, need to be located outside of settlement boundaries as they are generally carried out in the open air. Each application will therefore need to be determined on its merits in

accordance with detailed development management criteria and other relevant environmental protection and countryside policies.

23.2.2 Annex C of TAN 21: Waste (2014) sets out the specific planning considerations that need to be taken into account in assessing planning applications for new waste management facilities. TAN 21: Waste (2014) also establishes the requirement to submit a 'Waste Planning Assessment' for all applications for a waste facility classified as a disposal, recovery or recycling facility. The assessment should be proportionate to the nature, scale and size of the development proposed.

23.2.3 Details of the employment land allocations considered potentially suitable for the provision of waste management facilities are set out in Policy W3.

23.3 Agricultural Land – Disposal of Inert Waste

Policy W2 – Agricultural Land – Disposal of Inert Waste

Proposals to deposit inert waste on an agricultural holding that has been brought in from elsewhere for the purpose of agricultural improvement will only be permitted where:

a) a significant improvement in the agricultural land classification grade of the land will be achieved;

b) it can be demonstrated that the improvement sought is essential for the purposes of agriculture within the holding and cannot be achieved by means other than by deposit of waste;

c) the proposal involves depositing the minimum volume of waste consistent with achieving the agricultural land improvements sought; and

d) waste material capable of being economically recycled is not deposited on site.

23.3.1 Within the countryside, proposals are often put forward for the improvement of agricultural land through the deposit of inert waste material. Whilst such sites are often small in nature and often exempt from licensing from Natural Resources Wales, the process does require planning permission. Policy W2 sets out the criteria against which such proposals will be assessed. Proposals will only be permitted where it can be demonstrated that there is a genuine agricultural justification for the deposit of waste material.

23.4 Waste Sites

23.4.1 In accordance with PPW12 and Strategic Policy S17, Policy W3 identifies those employment allocations and existing waste disposal or management sites that are considered suitable in principle for new facilities, although all applications for development will have to satisfy a detailed assessment of any environmental and highway impacts, in accordance with other RLDP policies. Other areas having the benefit of lawful B2 use, including the Protected Employment Sites identified in Policy EA2, may also be considered, subject to meeting the relevant policies of the Plan.

Policy W3 – Identified Potential Waste Management Sites

The following sites are identified as having potential for the location of in-building waste management facilities, subject to detailed planning considerations:

Site ref	Site Name	Area (Ha)
W3a	Raglan Enterprise Park, Raglan	1.5
W3b	Land West of Raglan, Raglan	4.5
W3c	Newhouse Industrial Estate, Chepstow	2.5
W3d	Quay Point, Magor	14
W3e	Gwent Euro Park, Magor	7
W3f	Land Adjoining Oak Grove Farm, Caldicot	6
W3g	Existing Waste Facility - Five Lanes, Caerwent	2.57
W3h	Existing Llanfoist Civic and Transfer Station	1.2
Total		39.27

23.4.2 As noted in paragraph 15.3.4, Gwent Euro Park, Magor is located within the Gwent Levels Site of Special Scientific Interest (SSSI) and also within Flood Risk Zone C1 (Development Advice Map) and Defended Flood. However, the allocation area corresponds with land benefitting from an extant planning permission.

23.4.3 Site W3g Five Lanes, Caerwent lies within the Great Spring Source Protection Zone and on a limestone principal aquifer. This would need to be taken into account in any planning application for further waste related development at the site. Existing Waste Site W3h Llanfoist Civic Transfer Station lies within Flood Zone 2 (Development Advice Map) and Flood Zone 2 Rivers (Flood Map for Planning). These issues would need to be taken into account in any planning application for further waste related development at the site.

S17 - Links to Wider Policy Framework	
RLDP Objectives	Objective 5 – Minerals and Waste Objective 7 – Natural Resources Objective 14 – Infrastructure Objective 17 – Climate Change
Future Wales: The National Plan 2040 (WG, February 2021)	Policy 19 – Strategic Policies for Regional Planning
Planning Policy Wales Edition 12	Productive and Enterprising Places Theme (Chapter 5) -

(WG, February 2024)	
Well-being of Future Generations Act (WBFGA) (WG, 2015)	A resilient Wales A Wales of cohesive communities A globally responsible Wales
Gwent PSB Well-being Plan (August 2023)	• Take action to reduce our carbon emissions, help Gwent adapt to climate change, and protect and restore our natural environment.
Taking Monmouthshire Forward - Community and Corporate Plan 2022 - 2028 (April 2023)	This policy supports the Community and Corporate Plan objectives of ensuring Monmouthshire is a: • Green place to live and work, with reduced carbon emissions, and making a positive contribution to addressing the climate and nature emergency.
Key Evidence	Technical Advice Note 21: Waste (2014) Waste Planning Monitoring Report South East Wales April 2018-19 (Published 2020) Employment Land Review – November 2022

Monitoring and Review

23.4.4 This section of the RLDP sets out the monitoring framework which will be used to assess whether the Plan's strategy, policies and proposals are being delivered. It also provides an important check on whether the strategy is delivering sustainable development. The presence of clear mechanisms for implementation and monitoring forms one of the tests for assessing the soundness of the plan.

23.4.5 In accordance with legislative requirements[44], local planning authorities are required to develop a monitoring framework to enable the collation of valuable information on the performance of LDP policies. The framework set out below comprises a series of indicators, targets and triggers for further action in relation to each strategic policy and will form the basis for assessing the effectiveness of strategic policies. It also indicates the linkages between the plan themes, objectives and strategic policies. This will provide a basis for the annual monitoring report (AMR).

23.4.6 The indicators have been developed in accordance with Welsh Government guidance on monitoring and include the key indicators set out in the Development Plans Manual[45]. In addition, numerous local indicators have been identified which will further assist in assessing the effectiveness of the strategic policies.

23.4.7 The indicators are associated with corresponding targets, where relevant, which provide a benchmark for policy implementation. Where appropriate, 'milestone' targets are included in order to determine whether the plan is progressing towards meeting the overall strategy. The Council will investigate any strategic policy that fails to meet its target.

23.4.8 Trigger levels have also been included for certain targets in order to identify any potential failings in policy implementation at an early stage. They will provide a clear indication of when policy targets are not being met or insufficient progress is being made towards meeting them. Where a trigger level is reached, a detailed assessment of the related policy will be undertaken to determine whether the policy is functioning effectively.

23.4.9 Source data and the monitoring method for each indicator are also provided in the framework. This identifies the sources of information that will be used for consistent data analysis.

23.4.10 The ISA identifies the indicators that will be used to monitor progress on sustainability issues and more specifically sustainable development. These are set out in a separate framework which will be used as a tool for monitoring sustainable development in the plan area. Once the plan is adopted these indicators will also be monitored.

23.4.11 The information gathered through the monitoring framework and the ISA monitoring framework will be reported in the annual monitoring report (AMR). Local planning authorities are required to produce AMR's following the adoption of LDPs to review the plan's progress and to assess the effectiveness of its policies and proposals. The AMR will identify any actions that need to be taken to resolve any issues raised through the monitoring process. This could include amendments to policies to improve their effectiveness, and in more extreme cases could result in a review of part or of the whole plan. The AMR will report information covering

[44] PCPA 2004 (sections 61, 76 and 69(1)); LDP regulations 37, 41; SEA regulation 17.
[45] WG, March 2020

the preceding financial year and will be submitted to the Welsh Government by 31 October each year and will be available to view on the Council's website.

23.4.12 Irrespective of the AMR's findings, the Council is required to carry out a review of the whole plan every 4 years from the date of adoption.

23.4.13 The AMR will provide further detail on the assessment of the indicators and set out an appropriate response which could include the following actions.

Continue Monitoring	Monitoring suggests that the Plan's policies are being implemented effectively and no action is required.
Training Required	Monitoring suggests that the Plan's policies are not being implemented as intended and officer or Member training is required.
Supplementary Planning Guidance (SPG)	Monitoring suggests that the Plan's polices are not being implemented effectively and further guidance is required which may include the preparation of additional SPG.
Further Investigation	Monitoring suggests that the Plan's policies are not being implemented effectively and further investigation is required.
Policy Review	Monitoring suggests that the Plan's policies are not being implemented/not delivering intended outcomes. A review of the relevant policies may be required.
Plan Review	Monitoring suggests that as the Plan's strategy and policies are not being implemented/delivered a formal review of the Plan may be required in advance of the 4-year statutory review.

Strategic Policy: S1 RLDP Sustainable and Resilient Communities Growth Strategy

RLDP Objectives Supported: 1, 9, 10, 11, 12, 13 and 15. Other RLDP Policies: H1-H9, HA1-HA18

Monitoring Aim / Outcome	Indicator	Target	Trigger for Further Investigation	Source Data / Monitoring Method
To provide 6,210* homes to meet a housing requirement of 5,400 homes (including 1,595 – 2,000 affordable homes) in the County over the Plan period.	Indicator required by Legislation: The number of additional general market and affordable homes built over the Plan period.	Annual build rate of 360 dwellings per annum 2018-2033, including 106 affordable homes per annum.	Delivery is less than the RLDP strategy build rate for 2 consecutive years.	Housing Monitoring.
	Key Indicator: The annual level of dwelling completions monitored against the Anticipated Annual Build Rate (AABR).	Annual dwelling completions delivered in accordance with the AABR as set out in the adopted housing trajectory.	Delivery rate is below the AABR for 2 consecutive years.	Housing Monitoring.
	Key Indicator: Total cumulative completions monitored against the Anticipated Cumulative Completion Rate (ACCR).	Total cumulative dwelling completions delivered in accordance with the ACCR as set out in the adopted housing trajectory.	Total cumulative completions are below the ACCR for 2 consecutive years.	Housing Monitoring.

Strategic Policy: S2 Spatial Distribution of Development – Settlement Hierarchy

RLDP Objectives Supported: 1, 9, 10, 11, 12, 13 and 15. Other RLDP Policies: HA1 – HA18

Monitoring Aim / Outcome	Indicator	Target	Trigger for Further Investigation	Source Data / Monitoring Method
New housing development to be distributed in accordance with the RLDP Spatial Strategy.	Key Indicator: Proportion of new housing development delivered in accordance with the Spatial Strategy- Settlement Hierarchy set out in Policy S2.	Location of new residential development should correspond to the requirement set out in Policy S2: • Primary Settlements: 85%	Dwelling completions are +/- 10% of the requirements set out in Policy S2 for 2 consecutive years.	Planning applications database / Housing Monitoring.

		• Secondary Settlements: 6% • Main Rural and Minor Rural Settlements: 9%		

Strategic Policy: S3 Sustainable Placemaking & High-Quality Design

RLDP Objectives Supported: 3, 8, 11, 12, 13, 15, 16 and 17. Other RLDP Policies: PM1-PM3, HE1-HE3

Monitoring Aim / Outcome	Indicator	Target	Trigger for Further Investigation	Source Data / Monitoring Method
Ensure Sustainable Placemaking & High-Quality Design is achieved over the Plan Period.	**Local Indicator:** Review a range of completed developments on an annual basis.	No Target.	None.	MCC Annual Design Tour.

Strategic Policy: S4 Climate Change

RLDP Objectives Supported: 4, 6, 7, 15 and 17. Other RLDP Policies: NZ1, CC1-CC3.

Monitoring Aim / Outcome	Indicator	Target	Trigger for Further Investigation	Source Data / Monitoring Method
To ensure development accords with the principles of sustainable development, and addresses the causes	**Key Indicator:** Amount of development (by TAN 15 category) permitted in C1 and C2 floodplain areas not meeting all TAN 15 tests.	No applications permitted in C1 and C2 floodplain areas not meeting all TAN 15 tests.	1 or more application permitted for development in C1 and C2 floodplain areas not meeting all TAN 15 test in any 1 year.	
	Local Indicator: Proportion of development on brownfield land	Increase the proportion of development on brownfield land.	Further investigation if no increase in proportion of	Planning applications database.

of, and adapts to the impacts of climate change.	as a percentage of all development permitted**		development on brownfield land for 2 consecutive years.	
	Local Indicator: Delivery of net zero carbon homes.	All new build residential development to meet the standards set out in Policy NZ1.	1 or more new build homes do not meet the standards set out in Policy NZ1 in any 1 year.	Planning applications database and built performance surveys post construction.
	Local Indicator: Number and capacity (MW) of renewable, low and zero energy carbon developments.	Targets for renewable energy resource in accordance with the range set out in Table 3 – Renewable Energy Targets.	No permissions granted within 4 years	Planning applications database / Table 3 – Renewable Energy Targets.

Strategic Policy: S5 Green Infrastructure, Landscape and Nature Recovery

RLDP Objectives Supported: 3, 4, 6, 7, 8, 11, 12, 14 and 17. Other RLDP Policies: GI1-GI2, LC1-LC5, NR1-NR3, PROW1.

Monitoring Aim / Outcome	Indicator	Target	Trigger for Further Investigation	Source Data / Monitoring Method
To maintain, protect and enhance Monmouthshire's green infrastructure, landscape and biodiversity.	**Local Indicator:** Amount of Greenfield land lost to development which is not allocated in the development plan.	Minimise the loss of non-allocated Greenfield land.	Any loss of non-allocated greenfield land in any 1 year.	Planning applications database.
	Local Indicator: Developments granted planning permission that are within, or likely to adversely effect, internationally/ nationally important nature conservation areas.	None adversely affected.	1 or more application permitted for development within, or likely to adversely affect internationally/ nationally important nature conservation areas in any 1 year.	Planning applications database /GI Team /Environment Act Section 6 Reporting /Nature & Climate Emergency Reporting.

	Local Indicator: Developments granted permission that cause harm to the overall nature conservation value of locally designated nature conservation sites.	Minimise developments that would cause harm to the overall nature conservation value of locally designated sites.	Further investigation if 1 or 2 developments result in overall harm for 2 consecutive years, or 3 or more developments result in overall harm in any 1 year.	Planning applications database/ GI Team /Environment Act Section 6 Reporting /Nature & Climate Emergency Reporting.
	Local Indicator: Number of new developments granted planning permission delivering net benefit for biodiversity.	All relevant development delivering net benefit for biodiversity.	None.	Planning applications database /S106 Monitoring / GI Team /Planning Condition Monitoring.
	Local Indicator: Number of new developments granted planning permission that provide sufficient on-site GI in accordance with GI SPG.	Sufficient GI provided on development sites to not require off-site compensation.	Proposed or actual reduction in approved GI provision that is separate to SUDs provision.	Planning applications database including discharge of conditions, variations and NMA's / GI Team.
	Local Indicator: Number of new developments granted planning permission where tree, woodland and hedgerow loss are unavoidable that have not successfully applied the PPW12 compensatory ratios.	No new development has led to unavoidable loss.	Proposed or actual loss in trees, woodland or hedgerow.	Planning applications database including discharge of conditions, variations and NMA's / GI Team.

Strategic Policy: S6 Infrastructure

RLDP Objectives Supported: 1, 3, 4, 8, 10, 11, 12, 13, 14 and 17. Other RLDP Policies: IN1.

Monitoring Aim / Outcome	Indicator	Target	Trigger for Further Investigation	Source Data / Monitoring Method
Ensure the delivery of infrastructure to support the RLDP Growth and Spatial Strategy.	**Key Indicator:** Delivery of infrastructure that underpins the Plan's site allocations.	Infrastructure is delivered in accordance with the Infrastructure Delivery Plan (IDP).	Infrastructure not delivered in accordance with the timescales set out in the IDP.	Planning applications database /S106 Monitoring / Infrastructure Delivery Plan.

Strategic Policy: S7 Affordable Housing Provision

RLDP Objectives Supported: 9, 10, 11, 12 and 13. Other RLDP Policies: H1-H9, S2.

Monitoring Aim / Outcome	Indicator	Target	Trigger for Further Investigation	Source Data / Monitoring Method
To deliver 1,595 to 2,000 affordable homes over the Plan period 2018-2033.	**Key Indicator:** The level of affordable housing completions monitored against the Plan's overarching target.	Annual affordable housing completions delivered through the planning system in line with the target rate set out within S7.	Variation of 10% from the expected target for 2 consecutive years.	Housing Monitoring/ planning applications database/S106 Monitoring.
	Key Indicator: The tenure of affordable housing completions.	Housing completions to be in line with the Council's approach to affordable housing tenure.	Affordable housing completions deviate from the Council's tenure requirements.	MCC Housing Department.
	Key Indicator: Delivery of the affordable housing policy-thresholds and percentage targets for each sub-market area.	**New site allocations** – On-site provision of 50% affordable homes on all new site allocations. **Sites of 20 homes and over** – On-site provision of 50% affordable	Further investigation if the proportion of affordable housing achieved on development sites in each area falls below the	Housing Monitoring / Planning applications database / S106 Monitoring.

		housing on sites within existing settlement boundaries as identified in Tiers 1-3 of Strategic Policy S2. **Sites of 5 to 19 homes** – On-site provision of 40% affordable housing on sites within existing settlement boundaries as identified in Tiers 1-3 of Strategic Policy S2. **Sites of 1 to 4 homes** – Financial contributions towards the provision of affordable housing in the local planning authority area in accordance with the Affordable Housing Supplementary Planning Guidance. **Conversions and sub-divisions** – Financial contributions towards the provision of affordable housing in the local planning authority area in accordance with the Affordable Housing Supplementary Planning Guidance.	requirements set out in Policy S7.	
	Key Indicator: Viability – trends in house prices, land values, build costs.	No target.	No trigger.	Site specific viability assessments/ Home Track / Land Registry.
	Local Indicator: Number of affordable dwellings delivered through affordable housing exception schemes (Policy H9).	No target	No trigger	Planning applications database.

Strategic Policy: S8 Site Allocation Placemaking Principles

RLDP Objectives Supported: 9, 10, 11, 12 and 13. Other RLDP Policies: HA1-HA4

Monitoring Aim / Outcome	Indicator	Target	Trigger for Further Investigation	Source Data / Monitoring Method
To deliver the strategic housing sites in accordance with site allocation policies HA1 to HA4.	Local Indicator: The number of homes permitted on strategic sites as identified in site allocations policies HA1 to HA4.	Planning permission granted for the key strategic sites identified in site allocations policies HA1 to HA4 by the end of 2027.	Planning permission is not granted by the end of 2027 for each of the strategic sites.	Planning applications database/ Housing Monitoring.
To deliver the Strategic Site Land to the East of Abergavenny as identified in Policy HA1.	Key Indicator: Policy HA1: Land to the East of Abergavenny. Number of homes completed. Infrastructure requirements and placemaking principles delivered. Mix-use elements completed.	Dwelling completions delivered in accordance with the agreed housing trajectory. Infrastructure requirements and placemaking principles delivered in accordance with Policy HA1. Completion of the mixed-use elements delivered in accordance with agreed the agreed phasing programme.	Annual dwelling completions fall below the levels set out in the agreed housing trajectory. Infrastructure requirements and placemaking principles not delivered in accordance with Policy HA1. Completion of the mixed-uses not delivered in accordance with the agreed phasing programme.	Planning applications database/Housing Monitoring /S106 Agreement.
To deliver the Strategic Site Land to the East of Caldicot as identified in Policy HA2.	Key Indicator: Policy HA2: Land to the East of Caldicot. Number of homes completed.	Dwelling completions delivered in accordance with the agreed housing trajectory. Infrastructure requirements and placemaking principles delivered in accordance with Policy HA2.	Annual dwelling completions levels fall below the levels set out in the agreed housing trajectory. Infrastructure requirements and Placemaking principles	Planning applications database/ Housing Monitoring / S106 Agreement.

	Infrastructure requirements and placemaking principles delivered. Mix-use elements completed.	Completion of the mixed-use elements delivered in accordance with agreed the agreed phasing programme.	not delivered in accordance with Policy HA2. Completion of mixed-uses delivered in accordance with the agreed phasing programme.	
To deliver the Strategic Site Land at Mounton Road, Chepstow as identified in Policy HA3.	**Key Indicator:** Policy HA3: Land at Mounton Road, Chepstow Number of homes completed. Infrastructure requirements and Placemaking principles delivered. Mix-use elements completed.	Dwelling completions delivered in accordance with the agreed housing trajectory. Infrastructure requirements and placemaking principles delivered in accordance with Policy HA3. Completion of the mixed-use elements delivered in accordance with agreed the agreed phasing programme.	Annual dwelling completions fall below the levels set out in the agreed housing trajectory. Infrastructure requirements and placemaking principles not delivered in accordance with Policy HA3. Completion of mixed-uses not delivered in accordance with the agreed phasing programme.	Planning applications database/Housing Monitoring /S106 Agreement.
To deliver the Strategic Site Land at Leasbrook, Monmouth as identified in Policy HA4.	**Key Indicator:** Policy HA4: Leasbrook, Monmouth Number of homes completed. Infrastructure requirements and placemaking principles delivered.	Dwelling completions delivered in accordance with the agreed housing trajectory. Infrastructure requirements and Placemaking principles delivered in accordance with Policy HA4.	Annual dwelling completions fall below the levels set out in the agreed housing trajectory. Infrastructure requirements and placemaking principles not delivered in accordance with Policy HA4.	Planning applications database/Housing Monitoring /S106 Agreement.

Strategic Policy: S9 Gypsy and Travellers

RLDP Objectives Supported: 9, 10, 11, 12 and 13. Other RLDP Policies: GT1.

Monitoring Aim / Outcome	Indicator	Target	Trigger for Further Investigation	Source Data / Monitoring Method
To meet the identified needs of the Gypsy Traveller Accommodation Assessment (GTAA).	**Key Indicator:** The completion of Gypsy and Traveller site(s) to meet identified needs.	Gypsy Traveller site(s) identified in Policy S9 to be completed within the Plan period to meet the identified need set out in the GTAA 2021.	Planning permission not granted for the allocated Gypsy Traveller site(s) identified in Policy S9 during the Plan period, where an identified unmet need still exists.	Planning applications database.
	Local Indicator: Meet any new arising need for Gypsy and Traveller sites arising outside of the GTAA.	No Target.	No Trigger.	Gypsy and Traveller Accommodation Assessment (GTAA) / Planning applications database.

Strategic Policy: S10 Employment Site Provision

RLDP Objectives Supported: 1, 9, 11, 12, 14 and 15. Other RLDP Policies: EA1-EA2, E1-E2.

Monitoring Aim / Outcome	Indicator	Target	Trigger for Further Investigation	Source Data / Monitoring Method
To ensure a sufficient supply of employment land and to protect	**Key Indicator:** Net employment land development and take-up against allocations.	Take-up rate of employment land identified in Policy EA1.	No employment land take-up on allocated employment sites identified in Policy EA1 for 2 consecutive years.	Employment Land Monitoring.

the County's employment land.	**Key Indicator:** Enable job growth.	Deliver up to 416 additional jobs per annum.	No permission for developments that create jobs (including Use Class B jobs) in any 1 year.	Economic Insights Team / ONS Data.
	Local Indicator: Net employment land supply.	Maintain sufficient employment land to meet the identified take-up rate of 1.9ha per annum.	Insufficient employment land available to meet the identified take-up rate of 1.9ha per annum.	Employment Land Monitoring.
	Local Indicator: Planning permission granted for new development (by type) on allocated employment sites as identified in Policy EA1.	No specific target	No planning permissions granted on strategic employment sites identified in Policy EA1 for 2 consecutive years.	Employment Land Monitoring.
	Local Indicator: Planning permissions granted for employment use (i.e. B1, B2, B8 uses) by settlement.	No specific target.	None.	Employment Land Monitoring.
	Local Indicator: Amount of employment land lost to non-employment uses (i.e. non B1, B2, B8 uses).	Minimise the loss of employment land to non B1, B2 and B8 uses.	Further investigation if loss of any B1, B2 or B8 employment land in any 1 year.	Employment Land Monitoring / planning application database.

Strategic Policy: S11 Rural Economy

RLDP Objectives Supported: 1, 3, 6, 7, 9, 11, 12, 13 and 15. Other RLDP Policies: RE1-RE6.

Monitoring Aim / Outcome	Indicator	Target	Trigger for Further Investigation	Source Data / Monitoring Method
Encourage and support diversification of the rural economy.	**Local Indicator:** Number of rural enterprise and diversification schemes approved.	No target.	None.	Planning applications database.

Strategic Policy: S12 Visitor Economy

RLDP Objectives Supported: 1, 3, 11, 12, 13, 15, 16 and 17. Other RLDP Policies: T1-T2.

Monitoring Aim / Outcome	Indicator	Target	Trigger for Further Investigation	Source Data / Monitoring Method
Encourage and support high quality sustainable tourism schemes/facilities.	**Local Indicator:** Number of tourism schemes approved.	No target.	None.	Planning applications database.
	Local Indicator: Number of tourism facilities lost through development, change of use or demolition.	Minimise the loss of tourism facilities.	Further investigation if there is a loss of any 1 tourism facility in any 1 year.	Planning applications database.

Strategic Policy: S13 Sustainable Transport

RLDP Objectives Supported: 1, 8, 9, 11, 12, 13, 14, 15 and 17. Other RLDP Policies: ST1-ST6.

Monitoring Aim / Outcome	Indicator	Target	Trigger for Further Investigation	Source Data / Monitoring Method
To increase sustainable forms of transport in accordance with the LTS.	**Local Indicator:** Progression of Local Transport Strategy (LTS) schemes detailed in Policy ST5 in accordance with the LTS delivery timetable.	LTS proposals implemented in accordance with the LTS delivery timetable.	Further investigation if the LTS proposals detailed in Policy ST5 are not being implemented in accordance with the LTS delivery timetable.	Planning applications database/ LTS delivery programme.

Strategic Policy: S14 Town, Local and Neighbourhood Centres

RLDP Objectives Supported: 1, 2, 8, 9, 11, 12, 13, 14, 15 and 16. Other RLDP Policies: RC1-RC4.

Monitoring Aim / Outcome	Indicator	Target	Trigger for Further Investigation	Source Data / Monitoring Method
Direct new retail and commercial development to the County's Central Shopping and Commercial Areas (CSCAs) and local centres and seek to enhance their vitality, attractiveness, and viability.	**Local Indicator:** Amount of retail and commercial development permitted within the CSCAs and local centres as a proportion of all retail and commercial development permitted.	New retail and commercial floorspace to be located within the County's CSCAs and local centres.	Any new retail and commercial floorspace is developed outside the County's CSCAs and local centres.	Annual Retail Survey / planning applications database.
	Local Indicator: Percentage of vacant units within the CSCAs of each town and local centre.	No increase in the number of vacant units.	Further investigation if the vacancy rate in CSCAs / local centres increases for 2 consecutive years.	Annual Retail Survey.

	Local Indicator: Percentage of A1 uses in the primary shopping frontages (PSF) of Abergavenny, Caldicot, Chepstow and Monmouth.	Percentage of A1 uses no less that the percentage targets for the identified primary shopping frontages, set out in the PSF SPG.	Further investigation if the percentage figures for the primary shopping frontages fall below the targets set out in the PSF SPG.	Annual Retail Survey / planning applications database.

Strategic Policy: S15 Community Facilities, Outdoor Recreation and Allotment / Community Gowing

RLDP Objectives Supported: 3, 8, 9, 11, 12 and 14. Other RLDP Policies: CI1-CI4.

Monitoring Aim / Outcome	Indicator	Target	Trigger for Further Investigation	Source Data / Monitoring Method
To retain existing Community Facilities, Outdoor Recreation and Allotment / Community Growing and seek to develop additional facilities.	**Local Indicator:** Number of Community Facilities, Outdoor Recreation and Allotment / Community Growing spaces granted planning permission.	No Target.	None.	Planning applications database.
	Local Indicator: Number of Community Facilities, Outdoor Recreation and Allotment / Community Growing spaces lost to other uses.	Minimise the loss of Community Facilities, Outdoor Recreation and Allotment / Community Growing spaces.	Further investigation if there is a loss of any 1 Community Facilities, Outdoor Recreation and Allotment / Community Growing spaces in any 1 year.	Planning applications database.
	Local Indicator: Areas of Amenity Importance (AAI) lost to development.	No loss of AAI to development.	Further investigation if any loss of AAI in any 1 year.	Planning applications database.

Strategic Policy: S16 Sustainable Minerals Management

RLDP Objectives Supported: 1, 5, 6, 7, 14 and 17. Other RLDP Policies: M1-M3.

Monitoring Aim / Outcome	Indicator	Target	Trigger for Further Investigation	Source Data / Monitoring Method
Safeguard areas of aggregates resources.	**Local Indicator:** Aggregate landbank for MCC in years.	A minimum land bank of 10 years to be maintained.	Further investigation if 10 years land bank is not maintained.	SWRAWP Monitoring Report.
	Local Indicator: Number of permitted permanent sterilising non-mineral developments on safeguarded sites.	Minimise the number of permanent non-mineral developments on safeguarded sites.	Further investigation if any such developments permitted	Planning applications database.

Strategic Policy: S17 Sustainable Waste Management

RLDP Objectives Supported: 5, 7, 14 and 17. Other RLDP Policies: W1-W3.

Monitoring Aim / Outcome	Indicator	Target	Trigger for Further Investigation	Source Data / Monitoring Method
Meet the County's contribution to local waste facilities.	**Local Indicator:** Capacity to cater for the County's waste.	Maintain sufficient capacity to cater for the County's waste (to be confirmed at a regional level) in accordance with TAN 21.	Triggers to be established at a regional level in accordance with TAN 21.	South East Wales Waste Monitoring Report.

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Appendix 1: RLDP Supporting Documents

A number of additional supporting documents have been prepared to inform the Deposit Plan. These are listed below and should be read alongside the Plan as only their main findings are highlighted in this document given the significant amount of data/information they contain. The documents are available on the Planning Policy page of the Council's website.

Supporting Document	Purpose
RLDP Documents	
The Adopted LDP Review Report (approved by Council March 2018)	Evaluates the extent to which the Adopted LDP is functioning effectively.
RLDP Revised Delivery Agreement October 2024[46]	The Delivery Agreement sets out how the RLDP is to be prepared and provides a timetable for Plan preparation along with a Community Involvement Scheme which outlines the Council's principles of community engagement.
Issues, Vision and Objectives Paper (Updated September 2024)	Sets out the key issues, challenges and opportunities facing the County along with the RLDP vision and objectives to address the issues, challenges and opportunities identified.
Preferred Strategy Consultation (December 2022 – January 2023)	Sets out the preferred level of growth (housing and employment) and broad spatial distribution of this growth, along with the preferred strategic site allocations and strategic policies that will deliver and implement the strategy.
Preferred Strategy update (October 2023)	In October 2023 Council endorsed a number of key post-consultation updates to the Preferred Strategy as the basis for the ongoing preparation of the Deposit Plan.
Initial Consultation Report (2024)	Sets out how the Local Planning Authority (LPA) has undertaken public participation and consultation on the Preferred Strategy in accordance with LDP Regulation 16a. The Report identifies the steps taken to

[46] Original Delivery Agreement was approved by Council and agreed by Welsh Government May 2018. Subsequent revisions to the Delivery Agreement were approved by Council and agreed by Welsh Government in March 2020, October 2020 and December 2022.

	publicise plan preparation, in accordance with the CIS, outlining those engaged, summarises the main issues raised and the Council's response to these.
Integrated Sustainability Appraisal and Habitats Regulations Related Documents	
Integrated Sustainability Appraisal (ISA) Scoping Report (Updated November 2022)	This sets out the background for the ISA/SEA process that will be followed throughout the RLDP process and considers the characteristics of the RLDP area through a review of relevant plans, policies and programmes, and baseline information.
Initial Habitats Regulations Assessment (HRA) Screening Report (December 2018)	This outlines the requirement to undertake a HRA in respect of the RLDP and identifies the relevant European sites for consideration within the HRA process.
Initial ISA Report (AECOM, November 2022)	The Initial ISA Report is the second stage of the ISA process and appraises the social, economic, environmental and cultural effects of the RLDP Preferred Strategy. This includes the Vision, Strategic Objectives, Growth and Spatial Options and Preferred Strategy, including the Strategic Policies.
HRA of the Monmouthshire RLDP – Preferred Strategy (AECOM, November 2022)	The HRA Report provides a high level, preliminary assessment of the RLDP Preferred Strategy. At this stage, the aim of the report is to identify European sites which have the potential to be impacted by the RLDP, and to identify potential likely significant effects that the RLDP may have. It also identifies other plans, programmes and projects that may have 'in-combination' effects when considered alongside the effects of the RLDP.
ISA Report (AECOM, September 2024)	The ISA Report is the third stage of the ISA process and appraises the social, economic, environmental and cultural effects of the RLDP Deposit Plan and sets out relevant mitigation measures. The ISA is prepared alongside the RLDP as an integrated and iterative process. This process integrates sustainability considerations into all stages of Plan preparation and promotes sustainable development.
HRA of the Monmouthshire RLDP – Deposit Plan (AECOM, September 2024)	The HRA Report provides an assessment of the RLDP Deposit Plan. It determines the likely significant effects of the Plan, either individually or in combination with the effects of other plans and projects, on European sites of nature conservation importance and if applicable, scope what needs 'appropriate assessment' (AA) and how it will be undertaken. The HRA is prepared alongside the RLDP as an integrated and iterative process. The RLDP sets out policies and proposals which ensure that the

	requirements of the regulations are satisfied, and that the integrity of the European Designated sites are not adversely affected.
Supporting Evidence and Background Papers	
Monmouthshire RLDP Updated Demographic Evidence Report produced by Edge Analytics (November 2021)	Edge Analytics was commissioned to prepare a range of up-dated demographic, dwelling and employment growth scenarios using the 2018-based projections as the starting point, updated to take account of the ONS 2020 MYE and housing completion figures up to 2021. The Report applies a range of sensitivity assumptions to address key issues and challenges, to provide a range of growth scenarios for the County. The potential employment growth that could be supported by the demographic and dwelling-led scenarios is also set out using key assumptions on economic activity, unemployment rates and commuting ratio linked demographic and economic change. The report provides a suite of population, housing and economic growth outcomes to consider in the formulation of the RLDP.
Sustainable Settlements Appraisal (Updated December 2022)	Assesses and identifies settlements within Monmouthshire, which are potentially suitable to accommodate future growth in terms of their location, size, role and function and sets out an initial settlement hierarchy arising from the appraisal to inform the RLDP.
Growth and Spatial Options Paper (September 2022)	Provides the background to the growth and spatial option for the RLDP together with a review of the extent to which they will achieve the RLDP objectives.
Housing Background Paper (October 2024)	This paper analyses each component of housing supply in more detail before arriving at a housing allocations provision based on the methodology detailed within the Welsh Government Development Plans Manual Edition 3 (March 2020). It incorporates a Housing Potential Study which aims to identify where windfall sites could potentially be located within the existing settlement areas of Monmouthshire.
Local Housing Market Assessment Update (2024)	Provides a detailed insight into the local housing markets across the County. It includes a quantitative assessment of housing need that are used to inform the housing policies of the RLDP in terms of affordable housing provision, tenures and types of accommodation required.

High Level Viability Assessment (2024)	Assesses the viability of delivering market and affordable housing in Monmouthshire's housing market areas to inform policy formulation, spatial expression and application.
Gypsy and Traveller Accommodation Assessment – January 2021.	Report assesses the accommodation needs of Gypsy and Traveller families and establishes the number of pitches required to meet the identified need over the Plan period. Submitted to Welsh Government following Cabinet approval January 2021. Approved by Welsh Government in June 2024.
Infrastructure Delivery Plan (Appendix 8 of the Deposit RLDP)	Identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of the allocated sites.
Monmouthshire Employment Land Review, BE Group (October 2022)	Evidence base undertaken in line with Welsh Government Guidance. The ELR provides an assessment of the supply and demand for employment land in the County, looking at the available employment allocations and existing employment areas and reviews the property market, consults with local stakeholders and forecasts employment growth to understand employment demand requirements for the Plan period.
Regional Employment Study – Larger Than Local Study, BE Group (March 2020)	The report addresses the issues of employment land on a regional basis and covers five local authorities:- Monmouthshire, Blaenau Gwent, Torfaen, Caerphilly and Newport. It provides an economic evidence base, reviews the property and employment land market and recommends employment sites of regional significance for consideration in each of the constituent local authority areas.
MCC Economies of the Future Reports, BE Group (2018)	The MCC Economies of the Future Reports informed the development of the revised Economic Growth and Inward Investment Strategy for the Council. The analysis is also a fundamental piece of work that provides evidence to support the Monmouthshire RLDP.
Monmouthshire 2040: Our Economic Growth and Ambition Statement (November 2019)	The Economic Growth and Ambition Statement sets out the economic ambition for the County and will work alongside the RLDP in identifying suitable employment sites and premises, to enable existing businesses to grow and to attract inward investment from new businesses in key growth sectors.

Inward Investment Prospectus 2020: Growing your Business in Monmouthshire (March 2020)	This document supports the Monmouthshire 2040: Our Economic Growth and Ambition Statement (Nov 2019) noted above. The prospectus sets our aspirations to raise the economic profile of Monmouthshire with priorities to explore business opportunities and attract funding, while being sensitive to Monmouthshire's landscape.
Monmouthshire Economy, Employment and Skills Strategy (2023)	The EESS sets out the Council's aspirations to foster a diverse, fairer, greener and circular economy, generating sustainable employment growth and creating conditions for shared prosperity. It focuses on four key priority themes: Place – A vibrant, greener Monmouthshire; Enterprise – A thriving ambitious Monmouthshire; People – A fairer, more successful Monmouthshire; and Infrastructure – A well connected Monmouthshire attracting business investment. This Strategy, together with the RLDP and Local Transport Strategy, will support sustainable economic growth/job creation through a range of mechanisms and interventions.
Employment Land Background Paper (May 2022)	Provides an annual assessment of employment land take up across allocated and protected employment sites as identified in the Adopted LDP.
Regional Assessment of Future Growth and Migration for the Cardiff Capital Region (2024)	This report undertakes a regional assessment of future growth and migration for the Cardiff Capital Region (CCR). It aims to review how each LPA could contribute towards increasing the number of jobs across the region by 2040 and how the increase in jobs corresponds with projected growth in LPAs, the region and Future Wales 2040. It reviews the migration assumptions underpinning the proposed level of population/jobs growth and the potential implications of the spatial distribution of jobs and people on travel patterns. The study provides a policy-off approach to the assessment of potential growth in the region. As such, it sits alongside and complements RDLP evidence prepared by each authority in the region. It is not intended to replace or supersede the detailed consideration of growth potential prepared by individual authorities to inform the RLDP process.
Monmouthshire Landscape Sensitivity Update Study (White Consultants, October 2020)	An update to the Landscape Sensitivity and Capacity Study carried out in 2009, setting out detailed assessments and sensitivity evaluations of local landscape character areas and strategic candidate sites, with a view to establishing the least sensitive areas in terms of landscape for housing growth potential. The study area includes areas and defined candidate sites around primary and secondary settlements and Severnside.

Monmouthshire Retail Study Update (2024)	Evidence base to inform the development of the RLDP policy framework in relation to retail, commercial and town centres.
Retail Background Paper (2024)	Provides an annual retail 'health check' of our five main towns (i.e. Abergavenny, Caldicot, Chepstow, Monmouth and Usk).
Renewable and Low Carbon Energy Assessment October 2020	Evidence base to inform the development of renewable and low carbon energy policies for inclusion in the RLDP, undertaken in accordance with the Welsh Government's *Practice Guidance: Planning for Renewable and Low Carbon Energy – A Toolkit for Planners, September 2015*. The assessment aims to estimate the scale of renewable energy resource within Monmouthshire in order to provide some focus for setting local spatial policy and targets. Building on the findings of the 2020 report further work will be undertaken with the Carbon Trust to identify Local Search Areas and targets for renewable energy generation for inclusion in the Deposit Plan. These will be informed by industry engagement interviews, stakeholder workshops and further landscape sensitivity assessments.
Strategic Transport Assessment (STA) (2024)	Sets out the findings of transport modelling work undertaken in support of the Monmouthshire Strategic Transport Assessment (STA). The STA involves a high-level strategic transport assessment for Monmouthshire's proposed housing numbers and locations to determine their impact on the transport network across the County and also within the South East Wales Region. Consideration is given to the potential impact on both the highway and public transport network within the County.
Green Wedge Assessment (2024)	Assesses the Adopted LDP existing green wedges to assess whether these continues to meet the purposes as defined in PPW12. The review also assesses the potential for new green wedge designations in accordance with the provisions of national planning policy that "green wedges may be used to provide a buffer between the settlement edge and statutory designations and safeguard important views into and out of the area."
Green Infrastructure Strategy (2019)	Provides an overarching framework for positive actions by all stakeholders involved in the future protection, management and enhancement of GI in Monmouthshire and provides a delivery mechanism for actions set out in the Climate and Nature Emergency Strategy and Community and Corporate Plan, and sets out key objectives and priorities for guiding the planning management and delivery of GI in Monmouthshire. It also forms part of the baseline evidence to help inform the Strategic

	affordaRegional Green Infrastructure for Gwent delivered through the Gwent Green Grid Partnership, as well as a positive and proactive approach to the management of Monmouthshire's GI assets in tandem with the RLDP's strategy.
Strategic Flood Consequences Assessment (SFCA) (November 2022)	SFCA Stage 1 provides a high-level overview of flood risk. It brings together the policies, plans, strategies and studies relating to flood risk across the study area, and establishes the flood risk and development management objectives and priorities. It includes mapping of the flood risk from all sources.
Background Papers	A range of background papers have been prepared to support the RLDP, providing additional information/evidence in relation to specific topic areas relevant to the Plan.
Self-Assessment of the Deposit Plan against the Tests of Soundness (October 2024)	This sets out an assessment of the Deposit Plan against the Tests of Soundness, together with the Plan's general conformity with Future Wales 2040; the National Plan.
Candidate Sites	
Candidate Site Register (updated July 2023)	Provides a log of the Candidate Sites submitted during the second call for sites, to be considered for inclusion for development, redevelopment and/or protection in the RLDP.
Candidate Site Assessment Methodology (Updated July 2023)	Sets out the methodology used to assess candidate sites as part of the RLDP process.
Candidate Sites High-level Assessment (Updated July 2023)	Sets out a high-level assessment of Candidate sites submitted during the Second Call for Candidate Sites, based on a site's compatibility with the Preferred Strategy, insurmountable constraints to development of a site, site size threshold and site viability.
Candidate Sites Assessment Report (October 2024)	Sets out the findings of the Candidate Site Assessment process for the consideration of land for development and protection in the RLDP. It provides an overview of the candidate site assessment process from the Second Call for Candidate Sites to the proposed Deposit Plan allocations and identifies potential sites that are suitable for allocation within the RLDP, as well as those that are not considered suitable for allocation.

Appendix 2: RLDP Key Stages

Key Stages	Timescales	Additional Details
Delivery Agreement – establishes timetable for key stages of the plan preparation and approach to community engagement.	4-week consultation 21st March – 18th April 2018.	
	First revision March 2020	Amended to reflect the delays incurred up to the Preferred Strategy stage as a result of the pre-election period preceding the December 2019 General Election, the additional time and work needed to inform the Preferred Strategy and delays associated with joint working with neighbouring local authorities on joint evidence base work.
	Second revision October 2020	Update to reflect unavoidable delays relating to the Covid-19 pandemic, the review of the Issues, Vision, Objectives and Evidence Base, and publication of 2018-based population projections.
	Third Revision December 2022	Updated to reflect revised timescales following the decision to embark on a new Preferred Strategy.
	Fourth Revision, October 2024	Updated to reflect revised timescales given slippage incurred in relation to the preparation of the Deposit Plan.
Issues, Vision & Objectives- Identifies the key issues, challenges and drivers facing the County and sets out the vision and objectives for the RLDP	Consultation January – February 2019	
	Reviewed and amended June 2019.	Updated to reflect relevant feedback from targeted engagement process and the Council's declaration of a climate emergency in May 2019.
	Review undertaken in June 2020 incorporated into the RLDP Review of Issues, Vision and Objectives and Evidence Base in light of Covid 19 (September 2020	Review concluded that a number of issues and objectives are now considered to have increased emphasis and importance in light of Covid-19, consistent with the priorities identified in the Welsh Government Building Better Places document published in July 2020.

	approved by Council October 2020).	
	Updated December 2022	Minor updates to reflect latest position.
Growth and Spatial Options – sets out a number of alternative growth and spatial strategy options for the RLDP having regard to the Plan's evidence base and policy aspirations.	Non-statutory consultation for four-week period July – August 2019.	Undertaken based on WG 2014-based population and household projections.
	Growth & Spatial Options (December 2020)- Non-statutory consultation on updated options paper January – February 2021	Updated to take account of the 2018-based population and household projections.
	Progressing Monmouthshire's RLDP Council Report – 27th September 2022	Approval of the proposed growth and spatial options for progressing the RLDP, having regard to a number of challenges that have arisen including the Welsh Government objection to the Preferred Strategy (June 2021) and phosphate water quality issues in the Rivers Wye and Usk.
Preferred Strategy (alongside the Integrated Sustainability Appraisal (ISA) – first of the statutory consultation stages, providing the strategic direction for the development and use of land for the Plan period 2018-2033. It also identifies how much growth is needed and the broad locations of where this growth is likely to be.	Preferred Strategy (March 2020) – Issued for six-week consultation 9th March 2020 – 22nd April 2020.	
	20th July 2020 – notice of cessation of the Preferred Strategy Consultation due to Covid-19.	Following advice issued in a letter from the Minister for Housing and Local Government (7th July 2020), the decision was made to cease the RLDP Preferred Strategy consultation. The letter also required Local Planning Authorities to undertake an assessment of the RLDP evidence base, strategy and policies in terms of sensitivity to the consequences of the Covid-19 pandemic before progressing with Plan preparation.

	Preferred Strategy (June 2021) – Issued for eight-week consultation 5th July 2021 – 31st August 2021.	Updated to take account of 2018 population projections and reviewed in light of Covid-19.
	Preferred Strategy (Dec 2022)	Updated to have regard to the Welsh Government objection on the Preferred Strategy June 2021 and phosphate water quality issues in the Rivers Wye and Usk.
	Preferred Strategy Update (October 2023) (non-statutory stage)	Post-consultation key updates to the December 2022 Preferred Strategy as the basis for the ongoing preparation of the Deposit Plan – endorsed by Council 26th October 2023. These key updates included the change in stance to phosphates enabling the identification of a strategic site in Monmouth, the change of the strategic site allocation in Chepstow, an increase in the flexibility allowance and enhancing the sustainability credentials/energy efficiency of new homes to net zero carbon.

Appendix 3: Regional Strategic Partnerships

Monmouthshire is a border county in a strategic location, a "Gateway to Wales". Our County benefits from its involvement in regional economic partnerships including the Cardiff Capital Region City Deal, The Western Gateway and Marches Forward. Participation in these partnerships enable us to exploit areas of mutual benefit and added value, increase investment prospects, showcase best practice by building strong networks and identify opportunities to share services where it is cost effective.

Cardiff Capital Region City Deal

The Cardiff Capital Region (CCR) City Deal involves UK Government, Welsh Government and the ten regional Southeast Wales Authorities and will transition into the Southeast Wales Corporate Joint Committee (CJC) in March 2024. Its purpose is to build on the region's sectoral strengths, high skill base and three successful universities. The CCR City Deal seeks to accelerate economic growth and productivity through a series of considered targeted investments in skills, infrastructure, innovation-led scalable projects, businesses, and priority industry sectors including Compound Semi-Conductors and MedTech. It has brought a number of benefits to Monmouthshire, including:

- Partner member for the £50M Innovation Investment Fund;
- Shareholder in CCR Energy Ltd i.e., part ownership of the former Aberthaw Power Station which is being re-purposed as a green energy park;
- Lead partner in the deployment of c£4M InFuSe programme
- Co-agent on the Challenge Fund Food Security project (£2.4M) with Cardiff Council
- Circa £2M funds (debt finance) to Creo Medical – creating 40 high value jobs
- Recipient of c£1.5M funds for Metro Plus Scheme at Severn Tunnel Junction leveraging match contributions from the Local Transport Fund
- ULEV monies for roll-out of CCR Electric Vehicle Charging facilities.

The Western Gateway

The Western Gateway is a pan regional partnership for South Wales and Western England involving Local Authorities, City Regions, Local Enterprise Partnerships, UK and Welsh Governments. The purpose of the strategic partnership is to promote and maximise economic growth across South Wales and the West of England to create jobs, boost prosperity and support the world-renowned universities and businesses of the region.

This Gateway Partnership has set out the following ambitions:

- 'Net Zero'- Working to become the UK's first Green Energy Super Cluster by capitalising on the area's significant natural assets in solar, tidal, marine, and wind and leading capabilities in hydrogen, nuclear and industrial decarbonisation.
- 'Supporting Innovation'- Connecting the area's highly innovative sectoral clusters in Advanced Engineering, Creative Industries, Digital Connectivity (mobile telecommunications) and Data Solutions (businesses that create wealth from data such as fintech and space) to create a super-cluster with the scale to compete on the global stage.
- 'Connecting Communities'- Mapping the area's strategic transport plans to identify where there are gaps and use the information to help highlight where we need better connections that provide better transport and digital links to unlock 'net zero' potential.

- Investment – utilising its advantage of being a global gateway, the Partnership wishes to attract inward investment and grow exports by £4 billion.

Marches Forward Partnership

'Marches Forward' is a unique strategic cross border partnership between neighbouring local authorities in Herefordshire, Powys, Monmouthshire and Shropshire. Its key aims are:

- To tackle cross border shared interests, drive the best deal for our geography and boost investment into the region;
- To establish areas where there is mutual benefit and added value;
- To focus on the economy and green growth with other shared interests to include transport and digital transformation nature, energy and climate change, heath, housing and skills, food, rural development and the visitor economy.

The Partnership provides a flexible umbrella framework for joint working which supports local service delivery, based around how people and places function, rather than being confined within organisational or geographical boundaries. It enables us to harness the unique value of our cross-border location, supporting a shared understanding of 'life on the borders' as a focus for strategic joint working and to unlock additional investment into the area.

The priority themes of the Marches Forward Partnership are to work jointly as follows:

- Nature, Energy and Climate Adaptation.
- Transport and Digital Transformation.
- Health, Housing and Skills.
- Food, Rural Development and the Economy.

Appendix 4: Legislative and Policy Context

The RLDP has been prepared in the context of relevant national legislation and plans, policies and strategies at the national, regional and local level, details of which are set out below. Other topic specific legislation or policy documents are also be referenced throughout the RLDP, where relevant.

Legislative Context	
Well-being of Future Generations Act (Wales) 2015	The Wellbeing of Future Generations Act focuses on improving the economic, social, environmental and cultural well-being of Wales. It sets the framework for improving the well-being of Wales by ensuring that sustainable development is at the heart of government and public bodies. The Act is underpinned by seven well-being goals and sets out five ways of working needed for public bodies to achieve these goals.
Part 6 of the Planning and Compulsory Purchase Act 2004	This provides for a system of local development plans in Wales.
Planning (Wales) Act 2015	Sets out a series of legislative changes to deliver reform of the planning system in Wales, including strengthening the Plan-led approach to planning. The Act also introduces a legal basis for the preparation of a National Development Framework (NDF) and Strategic Development Plans (SDP).
Environment (Wales) Act 2016	Provides the legislation needed to plan and manage Wales' natural resources in a more proactive, sustainable and joined up way, providing an iterative framework which ensures that managing Wales' natural resources sustainably will be a core consideration in decision-making.
Active Travel (Wales) Act 2013	Seeks to instil a lasting transformation of how developments are planned to incorporate walking and cycling infrastructure from the outset as well as encouraging long term behavioural change. Makes provision for the mapping of active travel routes and related facilities in connection with Active Travel Network Maps.
A More Equal Wales - The Socio-economic Duty Equality Act 2010 (2021)	Supports the common purpose and ways of working put in place through the Well-being of Future Generations Act (Wales) 2015. Requires specified public bodies to consider how their decisions might help to reduce the inequalities associated with socio-economic disadvantage.

The Town and Country Planning (Local Development Plans, Wales) Regulations 2005 (as amended 2015)	The regulations establish a system for local development plan (LDPs) in Wales. These regulations prescribe the form and content of LDPs along with the procedures for LDP preparation.
Environmental Assessment of Plans and Programmes (Wales) Regulations 2004	These transpose into law the EU Strategic Environmental Assessment Directive in Wales. The set the procedures that must be followed and the information that must be contained in the Integrated Sustainability Assessment.
Conservation of Habitats and Species Regulations 2017 (as amended)	The need for an assessment of impacts on European sites us set out in the Conservation of Habitats and Species Regulations 2017 (as amended). To establish whether the integrity of any European sites will be affected, competent authorities must undertake a Habitats Regulations Assessment of the plan or project in question, including an Appropriate Assessment if necessary, before approving it.
National Policy Context	
Future Wales – The National Plan 2040 (Welsh Government, February 2021)	Published in February 2021, Future Wales is the National Development Framework for Wales and sets out the Welsh Government's land use priorities and provides a national land use framework for SDPs and LDPs, with a requirement for SDPs and LDPs to be in general conformity with Future Wales. It focusses on land use issues of national significance, setting out 11 outcomes which collectively are a statement of where the Welsh Government want Wales to be in 20 years' time.
Planning Policy Wales Edition 12 (Feb 2024)	Sets out the land use planning policies and overarching sustainable development goals for Wales. PPW12 secures a presumption in favour of sustainable development and considers a Plan-led approach to be the most effective means of securing sustainable development through the planning system. A strong focus on promoting placemaking is considered instrumental to achieving sustainable places, delivering socially inclusive development and promoting more cohesive communities. The latest iteration of PPW (ed 12) incorporates further clarification in relation Green Infrastructure and securing net benefit for biodiversity though the application of the step-wise approach.
Technical Advice Notes (TANs) and Minerals Technical Advice Notes (MTANs)	PPW is supported by Technical Advice Notes (TANs) and Minerals Technical Advice Notes (MTANs). They provide additional clarification on land use planning policies on a topic/issue basis and should be taken into account in the preparation of development plans.

Welsh National Marine Plan (2019)	Sits alongside Future Wales in identifying opportunities and guiding development both inshore and offshore. Contains plans and policies which will support the Welsh Government vision for clean, healthy, safe and diverse seas, guide future sustainable development and support the growth of marine space and natural resources ('blue growth'). Ensuring that coastal areas are planned in a socially, environmentally, culturally and economically sustainable way.
Llwybr Newydd: the Wales Transport Strategy 2021	Sets out the vision for how the transport system can help deliver the priorities for Wales and create a more prosperous, green and equal society. To achieve this vision it sets out three priorities that will improve health, tackle poverty and open the transport system to all, in particular for those without access to a car and those living in rural areas. This is supported by nine mini-plans explaining how these priorities will be delivered for different transport modes and sectors.
Local Development Plans Manual – Edition 3 March 2020	The Local Development Plans Manual contains practical guidance on how to prepare, monitor and revise a development plan, underpinned by robust evidence to ensure that plans are effective and deliverable.
Prosperity for All: A Low Carbon Wales, 2019	Prosperity for All: A Low Carbon Wales is a plan to achieve an 80% reduction of carbon emissions against a 1990 baseline by 2050. The plan is a collection of 100 policies and proposals that will help Wales meet its 2016 to 2020 carbon budget and 2020 emission reduction targets. It also sets out Welsh Government's commitment to respond to the impacts from climate change.
Regional Policy Context	
Strategic Development Plan for South East Wales	The preparation of Strategic Development Plans (SDP) is intended to provide a regional spatial framework for the future development and use of land within a defined region. This will allow larger than local issues such as housing demand, search areas for strategic employment sites and supporting transport infrastructure, which cut across a number of local planning authorities, to be considered and planned for in an integrated and comprehensive way. Monmouthshire is part of the South East Wales region.
Cardiff Capital Region (CCR) City Deal	Cardiff Capital Region comprises ten local authorities across the South East Wales region, including Monmouthshire, who are working collaboratively on projects and plans for the area. The authorities have entered into a City Deal to fund projects aimed at boosting the competitiveness of the region over the next 20 years. The CCR City Deal seeks to accelerate economic growth and productivity through a series of targeted

	investment in skills, infrastructure, innovation-led projects, businesses and priority industry sectors including compound semi-conductors and MedTech.
Cardiff Capital Region (CCR) Industrial and Economic Growth Plan	The CCR Growth Plan's two objectives are to boost competitiveness and tackle inequalities throughout the region by working collaboratively with public and private stakeholders within the CCR and with its neighbouring authorities.
Cardiff Capital Region (CCR) Strategic Business Plan and Wider Investment Fund	The purpose of this Business Plan is to establish policies that will attract new investment, improve connectivity, and develop the region's skills and education. It proposes a Strategic Sites Programme to address challenges facing the CCR relating to a shortage of good quality employment sites and premises.
The Western Gateway	The Western Gateway is a pan regional partnership for South Wales and Western England involving Local Authorities, West of England Combined Authority, City Regions, Local Enterprise Partnerships, UK and Welsh Governments. Its purpose is to promote and maximise economic growth across South Wales and the West of England to create jobs, boost prosperity and support the universities and businesses for the region. The Gateway Partnership has set the following ambitions: Net Zero; Support Innovation; Connecting Communities; and Investment.
Marches Forward Partnership	'Marches Forward' is a strategic cross border partnership between neighbouring local authorities in Herefordshire, Powys, Monmouthshire and Shropshire. Its priority themes are to work jointly on the following: nature, energy and climate adaption; transport and digital transformation; health, housing and skills; and food, rural development and the economy.
South-East Wales Regional Transport Plan	The Local Government and Elections (Wales) Act 2021 transferred the duty to develop a Transport Plan to the new Corporate Joint Committees (CJCs) in Wales. MCC is a member of the south east Wales CJC, which has the responsibility of preparing the Regional Transport Plan (RTP). The RTP will describe the key transport challenges and opportunities relevant to the region and set out policies and interventions for the local authorities to deliver in the five year period 2025 to 2030, as well as medium and longer term aspirations up to 2050.
South-East Wales Metro	The South Wales Metro will be an integrated network of bus, rail and walking and cycling routes that will improve connectivity, facilitating sustainable travel across south Wales. Improvements to Severn Tunnel Junction station, increased metro services along the Chepstow line, a new station at Magor and Undy and rail frequency enhancements are amongst the long term priorities of the South Wales Metro programme.

South-East Wales Area Statement	The South East Wales Area Statement area covers the local authorities of Blaenau Gwent, Caerphilly, Monmouthshire, Newport and Torfaen. It outlines the key challenges facing the locality, what we can all do to meet those challenges and how we can better manage our natural resources. In the South East a landscape scale approach has been taken to producing the Area Statement, considering where and why we want to build ecosystem resilience in terms of the special and distinctive landscape areas of South East Wales. The Statement covers four themes – Linking Our Landscapes; Climate Ready Gwent; Healthy Active Connected; Ways of Working.
Shoreline Management Plan (SMPs)	Shoreline Management Plans (SMPs) set out a strategic approach for managing the coastline from coastal flooding and erosion risks. In some areas there is a need to continue to defend the coastline form flooding and erosion. In other areas, sections of coast will be allowed to evolve naturally to adapt to changing environmental conditions. Monmouthshire's coastline is within the Severn Estuary Coastal Group (Shoreline Management Plan 19).
Gwent Public Services Board (PSB) Well-Being Plan for Gwent (2023)	The five separate Public Service Boards (PSBs) in the Gwent region (Blaenau Gwent, Caerphilly, Newport, Monmouthshire and Torfaen) have joined together to form the Gwent PSB. The Well-being Plan sets out what the PSB could do over the next five years to tackle the social, economic, environmental and cultural issues which can affect well-being in Gwent. The Plan contains two main objectives; to create a fairer, more equitable and inclusive Gwent for all and a climate-ready Gwent, where our environment is valued and protected, benefitting our well-being now and for future generations.
Neighbouring Local Planning Authorities: Joint Working and Collaboration	As a border County adjoins both Welsh and English Local Authorities. Monmouthshire is committed to working collaboratively with its neighbouring authorities. As part of collaboration with neighbouring authorities, regard has been given to national guidance which requires consideration of a collaborative approach to the site selection process to promote the development of previously developed land and to the development of a joint evidence base.
Regional Assessment of Future Growth and Migration for the Cardiff Capital Region (2024)	This report undertakes a regional assessment of future growth and migration for the Cardiff Capital Region (CCR). It aims to review how each LPA could contribute towards increasing the number of jobs across the region by 2040 and how the increase in jobs corresponds with projected growth in LPAs, the region and Future Wales 2040. It reviews the migration assumptions underpinning the proposed level of population/jobs growth

	and the potential implications of the spatial distribution of jobs and people on travel patterns. The study provides a policy-off approach to the assessment of potential growth in the region. As such, it sits alongside and complements RDLP evidence prepared by each authority in the region. It is not intended to replace or supersede the detailed consideration of growth potential prepared by individual authorities to inform the RLDP process.
Minerals Regional Technical Statement – 2nd Review for South Wales (September 2020) & Welsh Government RTS Clarification Letter – 11th November 2021	Minerals Technical Advice Note 1 (2004) requires the preparation of Regional Technical Statements (RTS) for the areas covered by both the South Wales and North Wales Regional Aggregates Working Parties (RAWPs). A revised RTS – 2nd Review for South Wales was published in September 2020 with an accompanying Welsh Government Clarification Letter published November 2021. These make recommendations for the apportionments necessary to ensure an adequate supply of crushed rock, including the nationally recommended minimum provision of 7 and 10 years, are available for the entire duration of the RLDP.
The South East Wales Waste Planning Report – 2018- 2019 (published 2020)	PPW11 and TAN 21: Waste, establish regional monitoring arrangements to inform the preparation of LDPs and assist in the determination of planning applications. The report assesses the need for additional landfill capacity and waste management facilities at a regional level.
Local Policy Context	
The Monmouthshire Well-being Plan (Public Service Board) February 2018 and Well-Being Plan Annual Report 2022	In May 2018 the Monmouthshire Well-being Plan was adopted by the Public Service Board (PSB), which is made up of public bodies such as Aneurin Bevan university Health Board, Gwent Police, MCC and South Wales Fire and Rescue Service. The Plan sets out what public services will work on together to address issues that matter to local communities. In 2022, the fourth annual report was published, reporting on the progress towards delivering the objectives of the Well-being Plan. The Monmouthshire Well-Being plan set the direction until 2023 when a new Gwent wide well-being plan was agreed as noted above.
Monmouthshire County Council Taking Monmouthshire Forward – Community and Corporate Plan, 2022-2028	The Monmouthshire County Council Community and Corporate Plan sets out the ambition for the Council and the county of Monmouthshire. It establishes the Council's purpose is for Monmouthshire to be "a zero-carbon county, supporting well-being, health and dignity for everyone at every stage of life". It sets out the objectives and values that will be adhered to and the actions needed to meet this purpose.
Monmouthshire County Council	In 2019 MCC declared a climate emergency. Since that date, the Council had published a climate emergency action plan, including an update in 2021 increasing the focus on the nature emergency. In 2022 the Council

Climate and Nature Emergency Strategy May 2024	declared a Motion for the Rivers and Ocean with a view to try and improve water quality in our rivers. This strategy aims to tie together the focus on all these areas of work and forms a high level strategy under which four actions plans sit, addressing Council Emissions, Nature Recovery, Rivers and Ocean and Communities and Climate.
Monmouthshire County Council Vision Monmouthshire 2040: Our Economic Growth and Ambition Statement (November 2019)	This statement identifies some of the challenges facing Monmouthshire that need to be addressed to strengthen its economy so that it can provide for future generations. A key aim is to attract investment and funding which will generate the right conditions for an 'inclusive economy'- one that is equitable, sustainable, stable, participatory and growing.
Monmouthshire County Council Inward Investment Prospectus 2020: Growing your Business in Monmouthshire	The prospectus builds on Vision Monmouthshire 2040 with the aim of attracting businesses to grow in Monmouthshire. It identifies some key focus areas that should be prioritised and advocates the provision of B use class employment land and a network of quality sites with varied characteristics in a mix of private and public ownership.
Monmouthshire County Council Economy, Employment & Skills Strategy (EESS) (2023)	The EESS sets out the Council's aspirations to foster a diverse, fairer, greener and circular economy, generating sustainable employment growth and creating conditions for shared prosperity. It focuses on four key priority themes: Place – A vibrant, greener Monmouthshire; Enterprise – A thriving ambitious Monmouthshire; People – A fairer, more successful Monmouthshire; and Infrastructure – A well connected Monmouthshire attracting business investment. This Strategy, together with the RLDP and Local Transport Strategy, will support sustainable economic growth/job creation through a range of mechanisms and interventions.
Monmouthshire Local Transport Strategy	A new Local Transport Strategy (LTP) has been produced to accompany the RLDP. The Strategy establishes a strategic framework for the development of the transport network in Monmouthshire. It identifies the key transport issues relevant to the County, the high-level interventions needed to address these and the specific priorities for Monmouthshire. Its aim is to facilitate and support the development of a modern, accessible, integrated and sustainable transport system, which increases opportunity, promotes prosperity for all and protects the environment; where walking, cycling, public transport and sustainable freight provide real travel alternatives.
Active Travel Network Maps (ATNMs)	In line with the Active Travel Act 2013 and the Welsh Government Travel Act Guidance 2021, the Council has produced Active Travel Network Maps (ATNMs) identifying the walking, cycling and wheeling routes required to

	create fully integrated networks. Proposed new developments are required to have regard to ATNMs and provide additional linkages where appropriate.
Green Infrastructure (GI) Strategy 2019	The GI Strategy sets out Monmouthshire's approach to the delivery of green infrastructure in the County. It promotes an integrated and joined up approach to delivering GI that takes into account the needs of Monmouthshire's communities, environment and economy.
Climate and Nature Emergency Action Plan (May 2024)	In May 2024 the Climate and Nature Emergency Strategy was published to update and combine previous strategies and better reflect the Community and Corporate Plan. The updated overarching strategy is underpinned by four work streams and action plans: Council Emissions, Nature Recovery, Rivers and Ocean and Communities and Climate.

Appendix 5: Regional Collaboration and Linkages with Neighbouring Local Authorities

The Plan has been prepared with regard to and where appropriate in co-operation with neighbouring authorities, in accordance with the tests of soundness as set out in the Development Plans Manual. Future Wales 2040 has brought further requirements to embrace regional planning and cross boundary working with neighbouring Local Authorities. The Council has therefore had regular and close contact with neighbouring LPAs and the wider South East Wales region, as well as English border authorities in preparing the RLDP.

This requires an understanding of existing and emerging potential linkages, strategies and policies in adjoining areas as well as active engagement in their development. Suitable consultation processes are in place to ensure that the existing and evolving planning policy context of neighbouring LPAs has been considered in the preparation of the RLDP, as well as regional collaboration through various regional groups.

In accordance with the requirements of soundness Test 1 'Does the plan fit? the Council must be able to demonstrate that the RLDP is consistent with other plans, (i.e. is it compatible with the plans of neighbouring LPAs? and has the LPA demonstrated it has exhausted all opportunities for joint working and collaboration on both plan preparation and the evidence base?). Monmouthshire adjoins 8 other LPA areas, all of which are at varying stages of their development plan production and are required to engage with the Council as part of their development plan preparation. As such, MCC has worked in collaboration with neighbouring LPAs throughout the different stages of the RLDP preparation process which has included engagement meetings to discuss and review the different stages of respective development plans – see Table X below. Considering the different timelines for the preparation of these local development plan, all neighbouring LPAs agreed that joint plans were not possible/appropriate. However, regional collaboration has enabled joint working, constructive discussions and shared information/experience between the LPAs which has minimised the risk of conflicting strategies/policy frameworks and an appropriate level of collaboration.

At the regional level, collaboration between the 10 LPAs in South East Wales takes place via various regional groups including South East Wales Strategic Planning Group (SEWSPG), South East Wales Planning Officer Society (SEWPOS) and South Wales Regional Aggregates Working Party (SWRARWP). Of note, through SEWSPG the LPAs have been working collaboratively on the preparation of a joint evidence base to inform RLDPs and the emerging SDP, details of which are set out in Table 2 below. SEWSPG/SEWPOS also facilitates the preparation and submission of joint responses to key consultation documents, including those published by Welsh Government. This demonstrates an appropriate level of collaboration at the regional level to inform the local development plan process, prior to formal regional collaboration on the preparation of the South East Wales SDP.

Table 1 sets out the regional collaboration work which has been undertaken and, where appropriate, has informed the RLDP process to date.

Table 1: Status of LDPs within neighbouring Local Planning Authorities

Local Authority	Current Adopted LDP	RLDP Plan Period	Context
Newport	2011-2026	2021-2036 Commenced preparation of a RLDP. The Preferred Strategy was consulted upon in 2023.	Newport is situated to the south west of Monmouthshire and acts as an important service and employment centre, in particular for the Severnside area of Monmouthshire, given the close proximity and good transport links between the settlements. Newport's Preferred Strategy seeks to prioritise the redevelopment and regeneration of land in the urban area, including the continued regeneration of the former Llanwern Steelworks at Glan Llyn and the former Whitehead Works, as well as edge of settlement development at appropriate locations on the edge of the urban area. The Council are proposing a mixed strategy of brown and greenfield sites. This is due to not enough brownfield land to meet their growth and there is therefore a need to develop some greenfield sites, some which have been identified towards the east of Newport's settlement near the M4 and A48 transport network. Monmouthshire collaborated with Newport and discussed whether we are able to utilise any their brownfield land to accommodate any of Monmouthshire's growth over the Plan period. However, it was concluded that Newport has no surplus brownfield land within the authority to accommodate growth from elsewhere. Monmouthshire will continue to work collaboratively with Newport as we progress with our respective RLDPs to ensure that any cross-boundary issues are fully considered.
Blaenau Gwent	2006- 2021	2018 – 2033 Commenced preparation of the RLDP. The	Blaenau Gwent has a small portion of county bordering the northwest of Monmouthshire in close proximity to Monmouthshire's primary settlement of Abergavenny. Blaenau Gwent's Preferred Strategy seeks to focus the growth based on the sustainable settlement hierarchy with the majority of development directed to their principal settlement of

Local Authority	Current Adopted LDP	RLDP Plan Period	Context
		Preferred Strategy was consulted upon in 2020.	Ebbw Vale, and remaining growth directed to main settlements in the Heads of the Valleys Area, maximising the use of brownfield land and ensuring development is located in more viable areas. Regard has been given to Blaenau Gwent's Preferred Strategy, however, it does not propose significant development in close proximity to Monmouthshire's border and therefore does not appear to generate any cross-border issues. Monmouthshire will continue to work collaboratively with Blaenau Gwent as we progress with our respective RLDPs to ensure that any cross-boundary issues are fully considered.
Torfaen	2013 – 2021	2022- 2037 Commenced preparation of the RLDP. Currently preparing the Preferred Strategy, with consultation expected in 2024.	Torfaen adjoins the western boundary of Monmouthshire, with the urban centre of Cwmbran providing a service centre for some of the western part of Monmouthshire, such as Little Mill, Penperlleni and Usk. Torfaen's Preferred Strategy is currently being prepared and it is therefore not known where new growth will be directed. Under the current adopted plan Mamhilad is identified for 1,700 homes and employment use. Given its proximity to the western parts of Monmouthshire this proposal may bring benefits of an expanding residential market and employment prospects. Monmouthshire will continue to work collaboratively with Torfaen as we progress with our respective RLDPs to ensure that any cross-boundary issues are fully considered.
Powys	2011-2026	2022 – 2037 Commenced preparation of the	Powys lies to the north west of Monmouthshire, however, the area adjoining Monmouthshire forms part of the BBNP and it is therefore under the National Park planning authority's jurisdiction. In view of this, development plan proposals in Powys are unlikely to generate any

Local Authority	Current Adopted LDP	RLDP Plan Period	Context
		RLDP. Currently preparing the Preferred Strategy with consultation is expected August-October 2024.	significant cross border issues. The Council however will continue to be involved in Powys's LDP process thought stakeholder engagement and wider consultation process.
Bannau Brycheiniog National Park(BBNP)	2007-2022	First RLDP withdrawn. New DA expected April 2025	Bannau Brycheiniog National Park (BBNP) is located to the north western area of Monmouthshire with some of Monmouthshire's settlements, namely Govilon and Gilwern, falling within Monmouthshire's the BBNP planning area. The BBNP's boundary lies to the north and west above the Primary Settlement of Abergavenny and Llanfoist. Abergavenny and Llanfoist are therefore recognised for their role in serving the south eastern areas of the National Park. BBNP's RLDP (2018-2033) was withdrawn in June 2024. A new Delivery Agreement is expected by April 2025. As such, it is not known where new growth will be directed, albeit within the National Park known for its special landscape quality, growth is traditionally low. As identified within the current plan and Future Wales 20240, Brecon is key settlement for regional growth. Monmouthshire will continue to work collaboratively with BBNP as we progress with our respective RLDPs to ensure that any cross-boundary issues are fully considered.
Cardiff	2006-2026	2021 – 2036 Commenced preparation of the RLDP. The Preferred Strategy	Cardiff, as the capital city of Wales is, and will remain a key strategic settlement of the south east Wales region, and due to the good transport links and close proximity with Monmouthshire acts as an important service and employment centre for Monmouthshire's residents. Cardiff's Preferred Strategy, which indicates a large land bank (21,400 homes) seeks to prioritise the redevelopment and regeneration of land in the urban area. All new allocations proposed are currently allocated within the existing LDP (and therefore effectively rolled forward).

Local Authority	Current Adopted LDP	RLDP Plan Period	Context
		was consulted upon in 2023.	Monmouthshire will continue to work collaboratively with Cardiff as we progress our respective RLDPs.
Forest of Dean (FoD)	2018-2026	**2021 – 2041** Commenced preparation of the Local Development Plan. The Preferred Option was consulted upon in 2022, with consultation on the Draft (Deposit) Plan in summer 2024.	The Forest of Dean adjoins the eastern boundary of Monmouthshire, in close proximity to the settlement of Chepstow. FoD's Draft Plan 2024 indicates strategic growth in the settlement of Lydney, which is located in close proximity to Chepstow connected by the A48 Trunk road. As part of the consultation for this growth Monmouthshire has been working with FoD LPA to ensure cross-boundary issues, including transport and air quality, are fully considered and addressed. Monmouthshire will continue to work collaboratively with the Forest of Dean as we progress with our respective RLDPs to ensure that any cross-boundary issues are fully considered.
South Gloucestershire	2006-2027	**2025-2040** Commenced preparation of the Local Development Plan. Currently preparing for the Preferred Spatial Strategy consultation. The	South Gloucestershire lies to the east of Monmouthshire linked by the Severn Bridge crossings. The current adopted Plan recognises the importance of the South Glos Severnside area as a strategically important location for employment uses, however, the focus for new growth is the Bristol north fringe and the east fringe areas. Accordingly, the planned growth does not create any significant cross boundary planning issues for Monmouthshire. South Gloucestershire's Preferred Spatial Strategy is currently being prepared and it is therefore not known where new future growth will be directed.

Local Authority	Current Adopted LDP	RLDP Plan Period	Context
		DA sets out that this is expected in 2024.	Monmouthshire will continue to work collaboratively with the South Gloucestershire as we progress with our respective RLDPs to ensure that any cross-boundary issues are fully considered.
Bristol	2006 – 2026	2025- 2040 Commenced preparation of the Local Plan review. The Plan review has been submitted for examination in April 2024.	As with Cardiff, Bristol acts as a key employment service centre for Monmouthshire residents. High levels of out commuting from the County to Bristol are evident as well as Bristol resident relocating to Monmouthshire to live. This has been exacerbated with the abolishment of the Severn Bridge Tolls. A Key Focus of Bristol's Plan is to deliver a thriving economy and as such Bristol is likely to remain a key employment and service area for Monmouthshire. Monmouthshire will continue to work collaboratively with Bristol as we progress our respective local development plans.
Herefordshire	2011-2031	2021-2041 Commenced preparation of the Local Plan review. Consultation on the Draft revised Plan took place in Spring 2024.	Herefordshire is situated to the north of Monmouthshire in close proximity to the settlement of Monmouth. Under the current adopted plan the nearest settlement to Monmouth, Ross-on Wye, has been identified for 900 homes and employment use. Given its proximity to Monmouth this proposal may bring benefits of an expanding residential market and employment prospects. Monmouthshire will continue to work collaboratively with Herefordshire as we progress with our respective RLDPs to ensure that any cross-boundary issues are fully considered

Table 2: Regional Collaboration as part of the RLDP Preparation Process

Regional Joint Work		LPAs	Purpose
Sustainable Settlement Assessment Methodology December 2022		SEWSPG	Developed a standardised methodology with the Sustainable Settlement Appraisal Paper to ensure consistency when assessing the sustainability of settlements across the region.
Regional Strategic Flood Consequences Assessment (Stage 1) November 2022		SEWSPG	Regional strategic flooding study to undertake a broad assessment of broad assessment of potential flood risks across the entire study area from all sources of flooding. The study identifies areas at potential high risk from flooding, as well as providing details of historical flood events and any details of any flood risk management structure or procedures present.
Green Wedge Methodology, February 2023		SEWSPG	Study to develop a standardised methodology for the identification and justification of green wedge designations in future LDPs.
Regional Assessment of Future Growth and Migration for the Cardiff Capital Region, July 2024		SEWSPG /SEWPOS	This study aims to review how each LPA could contribute towards increasing the number of jobs across the region by 2040 and how the increase in jobs corresponds with projected growth in LPAs, the region and Future Wales 2040. The study provides a policy-off approach to the assessment of potential growth in the region. As such, it sits alongside and complements RDLP evidence prepared by each authority in the region. It is not intended to replace or supersede the detailed consideration of growth potential prepared by individual authorities to inform the RLDP process.
SEWSPG Joint Working		SEWSPG	SEWSPG joint working is ongoing and includes: Viability toolkit Regional Gypsy Traveller Transit Sites Study

Appendix 6: RLDP Issues

Full details are set out in the Issues, Visions and Objectives Paper (Updated September 2024). The table below provides an extract of the issues facing the County and how the RLDP can influence these issues. The RLDP issues have been reviewed and updated throughout the RLDP process, as appropriate. The issues have been grouped in accordance with the seven well-being goals as set out in the Well- being of Future Generations (Wales) Act 2015 to ensure that they are framed within this context. This allows for the appreciation of social, economic and environmental matters to be embedded into the Plan.

A Prosperous Wales (Well-being Goal 1)

Employment & Economy
Issue
Issue 1 - There has been a slow uptake of employment land in the past. There is subsequently a need to consider whether existing available land is suitably located and fit for purpose. There is also a need to consider potential future demand for employment land along with Council aspirations for innovation across Monmouthshire and regional partnerships including the Cardiff Capital Region City Deal (CCRCD), Marches Forward Partnership and The Western Gateway. Opportunities associated with such partnership working include economic investment/innovation and transport and digital connectivity. **Issue 2** - While unemployment is low there is a net-outflow of commuters, both levels of out commuting and distances travelled to work are relatively high. There is a need to provide support for inward investment and local employment growth/opportunities to reduce the need to travel to work. **Issue 3** - Wage levels available for local jobs are lower than the average for Wales and the UK. Evidence continues to suggest that the income for economically active women who both live and work within the County is significantly lower than that of men within the same category. This coupled with high property prices makes it difficult for young people and future generations to live and work locally. Additional employment opportunities for young people are required to help reduce the numbers of this age group leaving the County. **Issue 4** - Monmouthshire has a dual economy. The qualifications, skills and earnings of the residents are above the regional and national average, however, for those working in the area earnings are lower and employment is relatively less skilled. **Issue 5** - The increasingly ageing population and shrinking working age population is limiting employment growth within Monmouthshire and social sustainability of communities. This is exacerbated by limited job opportunities and affordable housing availability.

Issue 6 - There is a need to sustain and regenerate the County's rural economy. There is current uncertainty regarding the impact of Brexit on agricultural subsidies.

Issue 7 - Higher levels of those in employment work at home compared to the Welsh average (2021 Census). Efficient digital infrastructure is essential to support home working and the general connectivity of the County's rural areas and to support economic growth.

Issue 8 - The role of high streets is changing due to out of town retail such as Cribbs Causeway, the increase in internet shopping, changing shopping habits (e.g. top-up grocery shopping), austerity, business rates and the cost of living crisis. As a result, vacancy rates in some of the County's town centres have increased. There is a leakage of expenditure out of the County and a need to protect and restore the vitality and viability of the County's town and local centres.

Issue 9 - Tourism plays a significant part in the Monmouthshire economy particularly in assisting in the diversification of the rural economy and in sustaining the County's historic town centres. In 2022 2.34 million visitors came to Monmouthshire, having an overall economic impact of £285 million. Staying visitors generate a higher economic impact than day visitors at £216 million in 2022 compared to £140 million in 2021 (Monmouthshire STEAM Report August 2023) highlighting the continued need for visitor accommodation. Changes relating to second homes and proposals for a tourist tax in Wales could affect this sector.

How can the RLDP influence these Issues?

A(i) The RLDP encourages a vibrant economy within the County, specifically by ensuring that sufficient employment sites are suitably located in attractive, accessible and sustainable locations and are of an appropriate size and type to meet the needs of the market/key employment/growth sectors, including, through support of start-up and growing businesses to help diversify the economy.

A(ii) The RLDP aims to ensure that there is a portfolio of sites available which is appropriate to market conditions and the needs of the Monmouthshire economy along with the wider Cardiff Capital Region. Consideration can be given to using CPO powers to ensure sites come forward.

A(iii) The RLDP ensures that, wherever possible, jobs and homes are located in close proximity to each other to provide greater opportunity for people to work and live locally. The RLDP will also ensure a range and choice of homes are available, in new developments, particularly where there is a need for affordable housing, to assist in regaining a balanced population.

A(iv) The RLDP takes a role in strengthening the local economy, ensuring an appropriate economic base to enable people to live and work in the County.

A(v) The RLDP contains policies that support the diversification of the rural economy.

A(vi) The RLDP helps to address digital exclusion by seeking to support the improvement of rural broadband and delivery of high speed connections.

A(vii) The RLDP contains polices that protect the vitality and viability of existing town centres, providing additional retail, commercial and social development opportunities where appropriate, including in relation to the regeneration of Caldicot and Usk, and ensures that the distribution of development supports these main centres in order to retain retail expenditure.

A(viii) The RLDP has reviewed the towns' primary shopping frontages (PSF) and related policies to have regard to the evolving role of the high street as a centre for a variety of retail, leisure and community uses. Sustainably located and well-connected development can support town centres.

A(ix) The RLDP contains policies that encourage tourism development while at the same time ensuring that the natural and built heritage that attracts visitors to the area is preserved and enhanced.

A Resilient Wales (Well-being Goal 2)

Air

Issue

Issue 10 - While air pollution is not a major problem throughout Monmouthshire, it can cause significant problems for people's health and there are localised problems in Chepstow and Usk, each having an Air Quality Management Area. The greatest problems associated with air quality in the County are caused by vehicle emissions.

How can the RLDP influence these Issues?

B(i) The RLDP seeks to minimise any polluting effects that might arise from new development in the County by ensuring it is sustainably located and well-connected to amenities. This can support modal shift to reduce the usage of private vehicles and to allow for increased walking, cycling and use of public transport. It also takes measures to ensure that the location of new development does not worsen conditions in existing Air Quality Management Areas or result in new ones. It supports the provision of ultra-low emission vehicle charging infrastructure.

Green Infrastructure, Biodiversity & Landscape
Issue
Issue 11 - Monmouthshire is renowned for its beautiful landscapes and major biodiversity resources including River SACs. The best of these assets should be protected, managed and enhanced for future generations. **Issue 12 -** There is a need to improve connectivity within the landscape through protecting and improving existing wildlife networks and corridors, including both green and blue infrastructure, and creating new linkages to allow species to move and adapt to climate change impacts. GI is also beneficial to human well-being.
How can the RLDP influence these Issues?
C(i) The RLDP ensures that new development is sustainable, does not cause harm to international, national and locally protected sites and species and, that where appropriate, necessary mitigation measures are taken to avoid any such adverse effects. The River Wye and River Usk water bodies within the County are currently experiencing water quality issues, specifically in relation to phosphate levels. The RLDP places a requirement for development to achieve phosphate neutrality or betterment in the River Usk and River Wye. **C(ii)** The RLDP must ensure biodiversity is considered in any development in order to protect any interest on the site and delivers Net Biodiversity Benefit. **C(iii)** An Integrated Sustainability Appraisal (ISA) and Habitats Regulations Assessment have been produced alongside the RLDP to ensure that any cumulative effects of development in Monmouthshire and adjoining areas does not result in harm to internationally designated nature conservation sites. **C(iv)** The RLDP contains policies to protect and enhance the green and blue infrastructure networks across the County.
Flooding
Issue
Issue 13 - Parts of the County are vulnerable to flooding. Climate change is likely to increase the risk of flooding, so mitigating climate change and ensuring building resilience is crucial.

How can the RLDP influence these Issues?
D(i) The RLDP ensures new built development is located away from flood risk areas and has a role to play in terms of reducing the risk from present day flood risk, as well as in relation to climate change adaptation and resilience. The provision of green open spaces and SUDs drainage features help reduce the risk of flooding.
Minerals & Waste
Issue
Issue 14 - Monmouthshire has made good progress in the promotion of the recycling and composting of waste, and the elimination of waste to landfill. Monmouthshire also has to make an appropriate contribution to the regional requirement for waste management. **Issue 15** - Mineral extraction plays a limited role in Monmouthshire's economy but there is a need to safeguard the County's resources in order to make an appropriate contribution to the sustainable supply of aggregates to the South Wales economy as a whole.
How can the RLDP influence these Issues?
E(i) The RLDP identifies sites that are appropriate for waste management or disposal facilities to meet local or regional requirements. **E(ii)** The RLDP ensures that mineral resources are safeguarded and exploited in a sustainable fashion that also enables Monmouthshire to meet its obligation to make a contribution to the requirements of the South Wales region.
Land
Issue
Issue 16 - There are limited opportunities for brownfield development within the County's existing urban areas. **Issue 17** - Monmouthshire has a significantly high percentage of best and most versatile agricultural land (i.e. Grade 1, 2 or 3a). While there is a need to conserve these resources, there are limited opportunities within the County for brownfield development and development on lower grades of agricultural land (i.e. Grade 3b, 4 and 5). Welsh Government clarification of policy priorities of protecting BMV land over renewable energy development has had implications in the findings of the Renewable Energy Assessment.

How can the RLDP influence these Issues?
F(i) The RLDP will seek to prioritise the use of previously developed land where opportunities arise. **F(ii)** The RLDP seeks to protect best and most versatile agricultural land whilst at the same time recognising that this will not always be possible where there is an overriding need for development.

A Healthier Wales (Well-being Goal 3)

Human Health
Issue
Issue 18 - While Monmouthshire performs relatively well on indicators relating to health, there is a need to promote opportunities for healthy living particularly in the context of an ageing population. **Issue 19** - While an ageing population brings many opportunities, it also brings challenges, increases in the number of people living with long term conditions can create pressures on existing health care provision. **Issue 20** - On the whole Monmouthshire's residents have good access to public open space, however, there are deficiencies in many of the County's communities in relation to community and formal recreational facilities. This can contribute to rural isolation in certain areas. **Issue 21** - Obesity is a growing problem throughout Wales. Although obesity rates in Monmouthshire are below the Welsh average consideration should be given to promoting healthy lifestyles.
How can the RLDP influence these Issues?
G(i) The RLDP can assist in creating a healthier Monmouthshire by ensuring sufficient policies are in place to support the provision of blue and green infrastructure and retention and/or improvement of the existing resource. **G(ii)** The RLDP provides policies to ensure health care provision is supported. **G(iii)** The RLDP helps ensure the provision of public open space and recreation facilities are protected by designating Areas of Amenity Importance as well as requiring new development to make a contribution to the provision of additional/improved facilities.

A More Equal Wales (Well-being Goal 4)

Population

Issue

Issue 22 - Monmouthshire is a predominantly rural County with almost half (47%) of the total population living in wards defined as being in rural areas (i.e. with a population of less than 10,000).

Issue 23 - The population of Monmouthshire at the time of the 2021 census was 92,961 an increase of 1.8% since 2011, a slower rate of growth than seen previously over previous census periods, although still higher than the Welsh average at 1.4%. This growth is being fuelled by in-migration.

Issue 24 - Monmouthshire has a significantly higher proportion of older age groups (65+) and lower proportion of young adults (16 – 44) compared to the Welsh average, the sharpest decline of which is in the working age population. The relative absence of young adults is often linked to the affordability of housing across the County and has an impact on future prospects of economic growth.

How can the RLDP influence these Issues?

H(i) The RLDP must decide on the level of growth appropriate for Monmouthshire and the spatial distribution of this growth between different urban and rural communities to address the challenges we face (including demography and affordability), balancing the greater sustainability of urban settlements with the difficulties of maintaining services in rural areas.

H(ii) There is a need to achieve a more balanced population structure to ensure there is a sufficient population of working aged people to support the Monmouthshire economy and to provide more opportunities for young people to both to stay within and move to the area. Due to the County's population shrinking due to more deaths than births, inward migration is essential to ensure communities are socially and economically sustainable. The RLDP plays a role in strengthening the local economy, ensuring an appropriate economic base to enable people to live and work in the County and ensuring that demand for homes is satisfied by providing good quality affordable homes for those who need them.

H(iii) The RLDP can help to address issues surrounding the ageing population through facilitating the provision of accessible services supported by connective infrastructure to meet local population growth needs.

A Wales of Cohesive Communities (Well-being Goal 5)

Housing

Issue

Issue 25 - Average house prices in the County are high at £400,496 when compared to the Welsh average of £238,871 (Hometrack, May 2024)[47] . The most significant increases have been experienced in recent years.

Issue 26 - House prices are also high in relation to earnings and there is a pressing need for additional affordable housing in the County in both urban and rural areas to assist in ensuring a balanced population.

Issue 27 - A range and choice of housing is needed to both meet the needs of an ageing population and to attract and retain the younger age groups.

Issue 28 - There is limited scope for significant or long-term expansion of the existing urban areas within the County due to a mix of physical, environmental and policy constraints.

How can the RLDP influence these Issues?

I(i) The RLDP affects the amount of housing to be provided by both deciding on overall levels of growth/spatial options and by setting thresholds and proportions to determine the amount of this residential development that is affordable. It also helps ensure a range and choice of homes are available in new developments and influences the type, tenure and nature of housing built within the County.

I(ii) The RLDP will have to resolve the amount of housing to be built in rural areas, balancing the need to sustain rural settlements by supporting services and enabling people to remain in their communities with the need to protect the countryside and ensure sustainable patterns of development.

I(iii) The RLDP enables provision of urgently needed affordable housing within exemplar, mixed, sustainable and well-connected places.

[47] Based on sales and valuations over six month period October 2023 – March 2024. Sales only over same period related to £360,465 for Monmouthshire and £230,710 for Wales. Data accessed on 13/05/2024.

Infrastructure
Issue
Issue 29 - Poor access to community facilities and declining local service provision is a particular issue for rural communities. **Issue 30** - Limited public transport, particularly in rural areas, makes it harder to access jobs, services and facilities, which could be exacerbated by rising fuel prices. There are nevertheless future opportunities for investment in public transport through the Cardiff Capital Region City Deal and advances in technology. **Issue 31** - There is a need to ensure that adequate physical, digital and social infrastructure is provided to support new development. This includes broadband infrastructure, the provision of sufficient water and sewerage infrastructure, transport infrastructure and active travel to support non-car modes of travel.
How can the RLDP influence these Issues?
J(i) The RLDP allocates land for housing and employment in rural areas in an attempt to sustain existing rural community facilities and services, weighing this against the need to avoid unsustainable travel patterns. **J(ii)** The RLDP helps ensure adequate provision of infrastructure to serve new development and contains policies to enable improvements or enhancements for existing development, e.g. provision of ultra-low emission vehicles (ULEV) charging, broadband connectivity and renewable energy. **J(iii)** The RLDP contains the policy framework to support the priorities of the local transport strategy.

A Wales of Vibrant Culture & Thriving Welsh Language (Well-being Goal 6)

Cultural Heritage
Issue
Issue 32 - Monmouthshire has a significant built heritage resource in terms of Scheduled Ancient Monuments, Listed Buildings, Conservation Areas, Historic Parks and Gardens, Historic Landscapes and Archaeologically Sensitive Areas that, together with their settings, require protection and enhancement.

Issue 33 - There is a need to protect, promote and enhance the best of our landscape and heritage which are an important part of our culture and play a key role in tourism and economic growth, along with providing support for the Welsh Language to ensure it is safeguarded and supported.

Issue 34 - The distinctive settlement pattern of Monmouthshire relates to historic towns and villages and their relationship with the surrounding rural areas. There has nevertheless been substantial suburban expansion in the South of the County, particularly adjacent to the M4 corridor. This area continues to receive further pressure for growth following the removal of the Severn Bridge Tolls in 2018 and the ambitions and opportunities associated with regional partnerships such as the Cardiff Capital Region City Deal (CCRCD), Marches Forward Partnership and The Western Gateway, which include economic investment/innovation and transport and digital connectivity.

How can the RLDP influence these Issues?

K(i) The RLDP contains measures to preserve and enhance the built heritage and best of the historic environment of Monmouthshire.

K(ii) The RLDP helps protect, promote and enhance the best of our landscape and heritage which are an important part of our culture and plays a key role in tourism and economic growth, along with providing support for the Welsh Language to ensure it is safeguarded and supported.

K(iii) Community involvement provides an opportunity to seek views on how Welsh language and culture interact with RLDP policies and proposals. The future of the Welsh language depends on a range of factors beyond the planning system, particularly education, demographic change, community activities and a sound economic base to maintain thriving sustainable communities. The planning system can contribute to the future well-being of the Welsh language by creating conditions for well-paid employment opportunities and a range of quality housing options resulting in sustainable communities. Planning policies must not seek to control housing occupancy on linguistic grounds[48].

K(iv) The RLDP plays a key role in promoting good quality sustainable design that enables new development and future growth to respect and enhance the existing distinctive character of Monmouthshire.

[48] Technical Advice Note 20 paragraphs 1.7.3, 2.2 and 2.6.4

Landscape
Issue
Issue 35 - Monmouthshire has a rich and diverse landscape that brings wider benefits to the local economy particularly through tourism and health and well-being. Monmouthshire as a whole incorporates parts of the Wye Valley National Landscape (AONB), the Bannau Brycheiniog National Park (BBNP) and the Blaenavon Industrial Landscape World Heritage Site.
How can the RLDP influence these Issues?
L(i) The RLDP seeks to protect high quality landscapes throughout the County, paying particular attention to those contained in the Wye Valley National Landscape (AONB), the Blaenavon World Heritage Site and in the setting of the Bannau Brycheiniog National Park (BBNP).

A Globally Responsible Wales (Well-being Goal 7)

Climatic Factors
Issue
Issue 36 - The volume of traffic in the County continues to increase (StatsWales, July 2024). There is a pattern of relatively long travel to work distances, high levels of car ownership and reliance on the private car. **Issue 37** - Small Scale and Local Authority wide Renewable Energy schemes are generally supported across Monmouthshire. **Issue 38 -** Monmouthshire's rurality, limited public transport, high levels of car ownership and the subsequent reliance on the private car, combined with high energy consumption and waste management can all contribute to carbon emissions. MCC recognises that we are in a climate and nature emergency and has committed to strive to limit the increase in global temperatures to 1.5^{o}C.

How can the RLDP influence these Issues?
M(i) Concerns about climate change require that efforts are made to reduce the reliance on the private car and the consequent impact of carbon dioxide emissions. The RLDP provides for appropriate development that promotes a safe, efficient, accessible and sustainable transport system providing opportunities for walking and cycling and encourages active travel in order to support carbon reduction. The RLDP provides a mix of employment and housing allocations with the aim of reducing the need to travel, acknowledging however that the reasons why people live where they do is complex. **M(ii)** A renewable energy assessment has been completed. The RLDP provides a positive policy framework to support renewable energy schemes. **M(iii)** The RLDP considers ways to support carbon reduction through a variety of measures including the use of renewable energy, the design and location of new development, the requirement for all new homes to be net zero carbon, encouraging balanced job and population growth to reduce out-commuting, the provision of broadband connectivity to reduce the need to travel, the provision of ultra-low emission vehicle charging infrastructure to reduce emissions and improve air quality, and the provision of quality Green and Blue Infrastructure. Proposals will be considered against our commitment to strive to limit the increase in global temperatures to 1.5°C.

Appendix 7: Housing Supply Components

Housing Supply Component	Number of Homes	Notes
Housing Provision	6,210	RLDP Housing Requirement – 5,400 +15% flexibility allowance
Less Commitments		
2018 – 24	2,220	Comprises 1,780 homes on large sites and 435 homes on small sites.
Existing Land Supply Commitments	798	Sites have only been included if construction is already underway or they have planning permission as at 01/04/2024 and they are expected to come forward during the Plan period.
Less Allowances		
Windfall Allowance (>10)	230	The windfall allowance is based on the number of homes estimated to be achievable on sites included within the Housing Potential Study. An allowance of 230 homes is included. Windfalls for the first 5 years of the plan are included within the completions (2018-2024). Windfalls with current permissions are included in the existing commitments. To avoid double counting the first 5 years of the remaining plan period are excluded from the calculations (2024-2029)
Small Site Allowance (<10)	657	A 15% reduction has been applied to the 10-year average for the remaining Plan period to reflect considerations including a reduction in the trend in recent years, fewer infill/conversion opportunities and the impact phosphate mitigation measures have had on planning applications.
Allocations		
LDP Rollover Allocations	175	Rollover Allocations are Adopted LDP large sites which do not currently benefit from planning permission, but there is evidence to demonstrate deliverability. Three sites make up the 'rollover' allocations component.
New Allocations	2,130	New allocations identified in the RLDP.

Total Allocations Provision	2,305	Rollover Allocations and New RLDP Allocations.

Appendix 8: Infrastructure Delivery Plan

Schedule of Infrastructure Projects

Land to the East of Abergavenny

Policy HA1: Land to the East of Abergavenny			
Site Area	**Allocation Type**	**Total Homes**	**Phasing Tranche**
Total Site: Circa 35.9ha	Strategic Mixed-Use Development including: Residential Mixed Use Commercial Hub Park & Ride B Use Class Uses	Total Homes: 500 Open Market: 250 Affordable Homes: 250	Years 11 to 15

Site Description

The site is located on the eastern edge of Abergavenny and is bounded by the A465 and railway line to its western boundary and the footslopes of the Ysgyryd Fach (Little Skirrid) to the east. Development here will expand the built-up area of the town beyond the railway line and A465 which currently form a hard development boundary to the town. The site will form a well-connected mixed-use urban expansion to Abergavenny.

Key site issues and constraints	Key policy requirements
• Integration of the site with Abergavenny and identifying and implementing connection crossings across the railway line and the A465. • Access and junction arrangements on to the A465. • Development to reflect character of historic Abergavenny and Abergavenny Conservation Area and respect surrounding landscape	• 50% affordable homes on site. • Net zero carbon homes. • Minimum of 1ha B1 Use Class uses. • Neighbourhood centre. • Green infrastructure. • Sustainable transport/Active travel • Park and ride facility serving Abergavenny Railway Station.

and views including Bannau Brycheiniog National Park (BBNP), Usk Valley and Blaenavon Industrial Landscape World Heritage site.
- The site is also within the River Usk phosphorus sensitive catchment area.

Key Infrastructure requirements (including broad costs where known):

Infrastructure requirements	Estimated cost	Funding sources	Delivery body	Phasing/ delivery period	Notes
Active Travel Routes to include: • To/from the site to the Railway Station and Abergavenny.	TBC	Developer/ Welsh Government/ Transport for Wales/ Network Rail	Developer/ Welsh Government/ SEWTRA/ Transport for Wales/ Network Rail	Prior to first occupation	To be delivered in accordance with the submitted connectivity strategy, Transport Assessment and Masterplan and informed by the WelTAG Abergavenny East Severence study. Internal layout and active travel routes within the site will be determined at the planning application stage in collaboration with active travel colleagues.
Highways and Sustainable Travel to include: • A465 reconfiguration to provide safe and accessible crossings. • Means of access and appropriate crossings over the railway line. • Off-site highway infrastructure improvements as necessary including, emergency secondary	TBC	Developer/ Welsh Government/ Transport for Wales/ Network Rail	Developer/ Welsh Government/ SEWTRA/ Transport for Wales/ Network Rail	TBC	Details to be determined through Transport Assessment and Masterplan and informed by the WelTAG Abergavenny East Severence study.

access onto Garth Road and accesses and junction onto the A465.					
Public transport financial contributions.	Circa £1,250,000	Developer	Regional and local bus providers	TBC	Financial contributions towards improved public transport and bus frequency. Cost may be subject to change, to be determined at the planning application stage.
Network Rail financial contributions	TBC	Developer	Network Rail	TBC	Financial contributions may be required towards improvements at Abergavenny Station. To be determined at the planning application stage.
Education – Primary and Secondary Schools	TBC	Developer	Developer	TBC	Education suggests there is currently capacity in both primary and secondary schools within the area. This will be reviewed at the planning application stage to determine whether any costs are required. There may also be a need for school transport costs, the cost of which will be determined at the planning application stage.
Green Infrastructure	TBC GI to be provided on-site as part of detailed	Developer	Developer / Monmouthshire County Council.	TBC	To be provided on site. GI includes informal open space, amenity green space, parks and

	masterplanning of the site in accordance with Policy GI1. Commuted sum TBC (see notes).				gardens, natural and semi natural space, community orchards and community growing. See policies GI1 and CI2 for further detail. The Councils preference is for GI is to be adopted by MCC a commuted sum will therefore apply – details to be determined at the planning application stage. PPW12 Chapter 6 indicates mitigation ratios for individual tree, hedgerow and woodland loss. Net biodiversity benefits e.g. bird/bat boxes to be provided on every home at the current cost of £100 per home. Further details to be determined at the planning application stage.
Nature Recovery	TBC Net Benefit for biodiversity to be provided on site as part of detailed master planning in accordance with policy NR1	Developer	Monmouthshire County Council.	TBC	To be provided on site, as far as is possible. Net Benefit for biodiversity relating to any loss or degradation and required compensation or net benefit and associated monitoring, management and maintenance in accordance with policy NR1.

	Commuted sum TBC, if necessary				This is additional to the requirements outlined under GI as it relates directly to existing ecological interests impacted by development.
Public Right of Way enhancements and connections	TBC	Developer	Developer	TBC	Details to be determined through Transport Assessment and Masterplanning.
Recreation and Open Space	A neighbourhood play area, local equipped play area and open space to be provided on site. Indicative cost of local equipped play area based on current requirements circa £85,000 + committed sum of circa £95,000. Indicative cost of neighbourhood play area based on current requirements circa £160,000 + committed sum of circa £190,000.	Developer	Developer / Monmouthshire County Council	TBC	Exact level and type of provision will be determined as part of Masterplanning and will account for existing local provision, including any deficiencies. Recreation and Open Space includes childrens play areas, formal pitches and other outdoor sports, see Policy CI2 for further detail. Off-site contributions only required if sufficient public open space, play areas and adult recreation provision is not included within the site. The Councils preference is for Recreation and Open Space to be adopted by MCC and therefore a commuted sum will be required. This is to be calculated at the time of the

	Off-site contributions may be required in accordance with the standards set out in Policy CI2. Commuted sum TBC (see notes).				planning application based on the layout and amount of open space.
Allotments	TBC	Developer	Developer	TBC	On site provision to be considered. Details to be determined at the planning application stage.
Drainage	TBC	Developer	Developer	TBC	Details to be determined at the planning application stage.
Water Supply/Sewerage	Hydraulic Modelling Assessment required for water supply network and public sewerage network.	Developer DCWW to fund any necessary phosphate infrastructure requirements	Hydraulic Modelling Assessment (HMA) to be funded by Developer. DCWW to deliver any necessary phosphate infrastructure requirements	TBC HMA at planning application stage.	DCWW note there are no issues with foul flows being accommodated for this site at the Llanfoist WwTW. Hydraulic Modelling Assessment required to ensure there is no detriment to existing customers supply and that there is sufficient hydraulic capacity to accommodate the site. If any works are required these would be developer funded via the requisition provisions of the Water Industry Act 1991.

					DCWW has confirmed upgrades to the Llanfoist WwTW to include phosphate stripping capability in AMP 8 2025-2030. The impact of development on water quality will be scrutinised as part of the planning application in consultation with relevant bodies including NRW and DCWW to ensure no adverse impacts to the river SAC. Any development proposal will need to be in accordance with the Environmental Permit issued by NRW.
Electricity – undergrounding of high voltage cables	Circa £1.6 million	Developer	Developer	TBC	Diversion of existing high voltage overhead cables is required along with other necessary works to facilitate development.

Key supporting information to include:

- Illustrative Masterplan.
- Ecological Assessments.
- Green Infrastructure and Landscape Assessments.
- Green Infrastructure Statement.
- Transport Assessment including Active Travel links and public transport enhancement arrangements.
- Connectivity Strategy setting out the number, location, form and delivery of connectivity points between the site and Abergavenny across the A465 and railway line.
- Drainage Strategy and TAN15 compliance statement.
- Noise Assessment.
- Air Quality Assessment.

- Hydraulic Modelling Assessment.
- Utilities Study.
- Agricultural Land Classification Assessment.
- Archaeological Desk Based Assessment
- Geoenvironmental and geotechnical desk study.
- Lidar Data.

Further reports/surveys as necessary to accompany planning application.

Land to the East of Caldicot/North of Portskewett

Policy HA2: Land to the East of Caldicot/North of Portskewett			
Site Area	**Allocation Type**	**Total Homes**	**Phasing Tranche**
Circa 64ha	Strategic Mixed-Use Development including: Residential Primary School Mixed use Local Centre B1 Use Class Employment Strategic public open space	Total Homes: 770 Open Market Homes: 385 Affordable Homes: 385	Years 6 to 15
Site Description			
The site is located to the north-east of Caldicot adjacent to the Crick Road, Portskewett site, to the south of a Council owned solar farm. The site includes previously developed land comprising a commercial equestrian centre, with much of the remainder being greenfield Council-owned land.			

Key site issues and constraints	Key policy requirements
• Location to the north of Caldicot Castle Scheduled Ancient Monument, the Caldicot Castle Country Park, Conservation Area and Area of Amenity Importance – no built development to take place in these areas. • Crick Road must be incorporated into the site as an active street frontage providing cohesion and a gateway for the development as a whole. • Proximity to Neddern Brook wetlands SSSI. • Site is located within the 12.6km Core Recreational Catchment Zone for the Severn Estuary European Marine Site, financial contributions may therefore be required as part of a mitigation strategy.	• 50% affordable homes on site. • Net zero carbon homes. • Minimum of 1ha B1 Use Class uses. • Primary School. • Local centre. • Sustainable transport/Active travel • Green infrastructure.

Key Infrastructure requirements (including broad costs where known):

Infrastructure requirements	Estimated cost	Funding sources	Delivery body	Phasing/ delivery period	Notes
Active Travel Routes to include: • A route to Caldicot Town Centre. • Connection to the former MoD railway cycle and walking route.	TBC	Developer / Public funding opportunities	Developer	Prior to first occupation	To be delivered in accordance with the submitted Transport Assessment and Masterplan which will be informed by the Caldicot Links WelTAG study. Internal layout and active travel routes within the site will be determined at the planning application stage in collaboration with active travel colleagues.

Highways and Sustainable Travel to include: • Access points on to Crick Road. • Access points on to B4245. • Speed limit revisions on Crick Road. • Off-site highway infrastructure contributions as necessary including, local and strategic highway network improvements.	TBC	Developer	Developer	TBC	Details to be determined through Transport Assessment and Masterplanning.
Public transport financial contributions.	Circa £1,925,000	Developer	Regional and local bus providers	TBC	Financial contributions towards improved public transport and bus frequency. Cost may be subject to change, to be determined at the planning application stage.
Education – Primary and Secondary Schools	Primary School required on site estimated cost circa £13 million	Welsh Government / Monmouthshire County Council / Developer – S106 contribution and Land contribution	Monmouthshire County Council	TBC	Primary School required to be provided on site. Location within the site and delivery timescale to be determined through Masterplanning. Land and S106 contributions to be provided by developer, cost of which to be determined. MCC Education suggests there is currently capacity in secondary schools in the locality. This will be reviewed at the

					planning application stage to determine whether any costs are required.
Green Infrastructure	TBC GI to be provided on-site as part of detailed masterplanning of the site in accordance with Policy GI1. Commuted sum TBC (see notes).	Developer	Developer / Monmouthshire County Council.	TBC	To be provided on site. GI includes informal open space, amenity green space, parks and gardens, natural and semi natural space, community orchards and community growing. See policies GI1 and CI2 for further detail. The Councils preference is for GI is to be adopted by MCC a commuted sum will therefore apply – details to be determined at the planning application stage. PPW12 Chapter 6 indicates mitigation ratios for individual tree, hedgerow and woodland loss. Net biodiversity benefits e.g. bird/bat boxes to be provided on every home at the current cost of £100 per home. Further details to be determined at the planning application stage.
Nature Recovery	TBC Net Benefit for biodiversity to	Developer	Monmouthshire County Council.	TBC	To be provided on site, as far as is possible. Net Benefit for biodiversity relating to any loss or degradation and required

	be provided on site as part of detailed master planning in accordance with policy NR1 Commuted sum TBC, if necessary				compensation or net benefit and associated monitoring, management and maintenance in accordance with policy NR1. This is additional to the requirements outlined under GI as it relates directly to existing ecological interests impacted by development.
Severn Estuary European Marine Site – financial contribution	TBC	Developer	Monmouthshire County Council.	TBC	Site is located in the 12.6km core recreational catchment zone for the Severn Estuary European Marine Site, a financial contribution may be required as part of the mitigation strategy for the protected site to reduce recreational pressure on the features of the Estuary.
Public Right of Way enhancements and connections	TBC	Developer	Developer	TBC	Details to be determined through Transport Assessment and Masterplanning.
Recreation and Open Space	A local equipped play area and open space to be provided on site. Indicative cost of local equipped play area based on current	Developer	Developer / Monmouthshire County Council	TBC	Exact level and type of provision will be determined as part of Masterplanning and will account for existing local provision, including any deficiencies. Recreation and Open Space includes childrens play areas, formal pitches and other outdoor sports, see Policy CI2 for further detail.

	requirements circa £85,000 + committed sum of circa £95,000. Off-site contribution required towards play provision at Caldicot Castle (Based on current indicative cost circa £775,000). Further off-site contributions may be required in accordance with the standards set out in Policy CI2. Commuted sum TBC (see notes).				Off-site contributions only required if sufficient public open space, play areas and adult recreation provision is not included within the site. The Councils preference is for Recreation and Open Space to be adopted by MCC and therefore a commuted sum will be required. This is to be calculated at the time of the planning application based on the layout and amount of open space.
Allotments	TBC	Developer	Developer	TBC	On site provision to be considered. Details to be determined at the planning application stage.

Drainage	TBC	Developer	Developer	TBC	Details to be determined at the planning application stage.
Water Supply/Sewerage	Hydraulic Modelling Assessment required for water supply network and public sewerage network.	Developer	Hydraulic Modelling Assessment (HMA) to be funded by Developer.	HMA at planning application stage.	DCWW note there are no issues with foul flows being accommodated for this site at the Newport Nash WwTW. Hydraulic Modelling Assessment required to ensure there is no detriment to existing customers supply and that there is sufficient hydraulic capacity to accommodate the site. If any works are required these would be developer funded via the requisition provisions of the Water Industry Act 1991.

Key supporting information to include:

- Masterplan.
- Viability Assessment.
- Agricultural Land Classification Report.
- Ecology Assessments.
- Green Infrastructure and Landscape Assessments.
- Green Infrastructure Statement.
- Flood Consequences Assessment & Drainage Report.
- Relevant Heritage Assessments.
- Highways and Transport Assessments.
- Environmental Health Assessments including Air Quality and Noise.
- National Grid feasibility study.
- Hydraulic Modelling Assessment.

Further reports/surveys as necessary to accompany planning application.

Mounton Road, Chepstow

Policy HA3: Mounton Road, Chepstow			
Site Area	**Allocation Type**	**Total Homes**	**Phasing Tranche**
Circa 12.8ha	Strategic Mixed Use development including: Residential Commercial uses such as Class C1 Hotel and Class C2 Residential care home	Total Homes: 146 Open Market Homes: 73 Affordable Homes: 73	Years 6 to 15

Site Description

Land at Mounton Road is located off the western edge of Chepstow's existing settlement boundary, west of the A466 (St Lawrence Road), north of the A48 and south of the highway Mounton Road

Key site issues and constraints	Key policy requirements
• Location in close proximity to Chepstow's air quality management area (AQMA)at Hardwick Hill and the potential effects of increased vehicular movement on the Highbeech Roundabout. • Location in close proximity to the setting of the Wye Valley National Landscape (AONB) and Mathern's Conservation Area. The site is within the parkland setting of Grade II Listed St Lawrence House. There are groups of mature woodland and mature hedgerows which contain several important natural ecological habitats. • Location within the 12.6km Core Recreational Catchment Zone for the Severn Estuary European Marine Site, financial contributions may therefore be required as part of a mitigation strategy.	• 50% affordable homes on site. • Net zero carbon homes. • Commercial uses such as Class C1 Hotel and Class C2 Residential care home. • Green infrastructure. • Sustainable transport/Active travel

Key Infrastructure requirements (including broad costs where known):					
Infrastructure requirements	**Estimated cost**	**Funding sources**	**Delivery body**	**Phasing/ delivery period**	**Notes**
Active Travel Routes	TBC	Developer	Developer	Prior to first occupation	Details to be determined through Transport Assessment and Masterplanning. Internal layout and active travel routes within the site will be determined at the planning application stage in collaboration with active travel colleagues.
Highways and Sustainable Travel to include: • Access point on to A466. • Highbeech Roundabout- improvements. • Speed limit revisions along A466 • Off-site highway infrastructure contributions as necessary including, local and strategic highway network improvements.	TBC Land to be safeguarded on site for Highbeech Roundabout.	Developer	Developer	TBC	Details to be determined through Transport Assessment and Masterplanning. No specific contribution identified for Highbeech Roundabout improvements, land to be safeguarded to futureproof and provide opportunity for improvements if deemed necessary.
Public transport financial contributions.	Circa £365,000	Developer	Regional and local bus providers	TBC	Financial contributions towards improved public transport and bus frequency. Cost may be subject to change, to be determined at the planning application stage.

Education – Primary and Secondary Schools.	TBC	Developer	Developer	TBC	MCC Education suggests there is currently capacity in both primary and secondary schools in the locality. This will be reviewed at the planning application stage to determine whether any costs are required.
Green Infrastructure.	TBC GI to be provided on-site as part of detailed masterplanning of the site in accordance with Policy GI1. Commuted sum TBC (see notes).	Developer	Developer / Monmouthshire County Council.	TBC	To be provided on site. GI includes informal open space, amenity green space, parks and gardens, natural and semi natural space, community orchards and community growing. See policies GI1 and CI2 for further detail. The Councils preference is for GI is to be adopted by MCC a commuted sum will therefore apply – details to be determined at the planning application stage. PPW12 Chapter 6 indicates mitigation ratios for individual tree, hedgerow and woodland loss. Net biodiversity benefits e.g. bird/bat boxes to be provided on every home at the current cost of £100 per home. Further details to be determined at the planning application stage.
Nature Recovery	TBC	Developer	Monmouthshire County Council	TBC	To be provided on site, as far as is possible.

	Net Benefit for biodiversity to be provided on site as part of detailed master planning in accordance with policy NR1 Commuted sum TBC, if necessary				Net Benefit for biodiversity relating to any loss or degradation and required compensation or net benefit and associated monitoring, management and maintenance in accordance with policy NR1. This is additional to the requirements outlined under GI as it relates directly to existing ecological interests impacted by development.
Severn Estuary European Marine Site – financial contribution	TBC	Developer	Monmouthshire County Council	TBC	Site is located in the 12.6km core recreational catchment zone for the Severn Estuary European Marine Site, a financial contribution may be required as part of the mitigation strategy for the protected site to reduce recreational pressure on the features of the Estuary.
Public Right of Way enhancements and connections	TBC	Developer	Developer	TBC	Details to be determined through Transport Assessment and Masterplanning.
Recreation and Open Space	TBC A local equipped play area and open space to be provided on site. Indicative cost of local equipped play area based	Developer	Developer / Monmouthshire County Council	TBC	Exact level and type of provision will be determined as part of Masterplanning and will account for existing local provision, including any deficiencies. Recreation and Open Space includes childrens play areas, formal pitches and other outdoor sports, see Policy CI2 for further detail.

	on current requirements circa £85,000 + committed sum of circa £95,000. Off-site contributions may be required in accordance with the standards set out in Policy CI2. Commuted sum TBC (see notes).				Off-site contributions only required if sufficient public open space, play areas and adult recreation provision is not included within the site. The Councils preference is for Recreation and Open Space to be adopted by MCC and therefore a commuted sum will be required. This is to be calculated at the time of the planning application based on the layout and amount of open space.
Allotments	TBC	Developer	Developer	TBC	On site provision to be considered. Details to be determined at the planning application stage.
Drainage	TBC	Developer	Developer	TBC	Details to be determined at the planning application stage.
Water Supply/Sewerage	Hydraulic Modelling Assessment required for water supply network.	Developer	Hydraulic Modelling Assessment (HMA) to be funded by Developer.	HMA at planning application stage.	DCWW note there are no issues with foul flows being accommodated for this site at the Newport Nash WwTW. Hydraulic Modelling Assessment required to ensure there is no detriment to existing customers supply and that there is sufficient hydraulic capacity to accommodate the site. If any works are required these would be developer funded via the requisition provisions of the Water Industry Act 1991.

Key supporting information to include:
• Masterplan. • Viability Assessment. • Agricultural Land Classification Report. • Ecology Assessments. • Green Infrastructure and Landscape Assessments. • Green Infrastructure Statement. • Archaeology and Heritage Assessments. • Flood Consequence Assessment and Drainage Strategy. • Highway and Transport Assessments. • Environmental Health Assessments including Air Quality. • National Grid feasibility study. • Hydraulic Modelling Assessment Further reports/surveys as necessary to accompany planning application.

Leasbrook, Monmouth

Policy HA4: Leasbrook, Monmouth			
Site Area	**Allocation Type**	**Total Homes**	**Phasing Tranche**
Circa 11ha	Residential	Total Homes: 270 Open Market Homes: 135 Affordable Homes: 135	Years 6 to 15
Site Description			
Leasbrook is located on the edge of Monmouth north of Dixton Road. The site is located adjacent existing development at Dixton Close and Hereford Road, including Haberdashers' Monmouth Schools playing pitches to the west and agricultural land to the east and north.			

Key site issues and constraints	Key policy requirements
• Flooding on entrance of site. • Close proximity to a Wye Valley and Forest of Dean bat SAC, located within the Core Sustenance Zone and immediately adjacent to the Juvenile Sustenance Zone. • Adjacent Conservation Area and Lower Wye Valley Landscape of Historic Interest. • Site is located within the River Wye phosphorus catchment area.	• 50% affordable homes on site. • Net zero carbon homes. • Green infrastructure. • Sustainable transport/Active travel

Key Infrastructure requirements (including broad costs where known):

Infrastructure requirements	Estimated cost	Funding sources	Delivery body	Phasing/ delivery period	Notes
Active Travel Routes to include: • MCC-M25A(DL).	TBC	Developer	Developer	Prior to first occupation	Details to be determined through Transport Assessment and Masterplanning. Internal layout and active travel routes within the site will be determined at the planning application stage in collaboration with active travel colleagues.
Highways and Sustainable Travel to include: • Access point on to A466 Dixton Road. • Emergency access point – A466 Hereford Road. • Off-site highway infrastructure contributions as necessary including, local	TBC	Developer	Developer	TBC	Details to be determined through Transport Assessment and Masterplanning.

and strategic highway network improvements.					
Public transport financial contributions.	Circa £675,000	Developer	Regional and local bus providers	TBC	Financial contributions towards improved public transport and bus frequency. Cost may be subject to change, to be determined at the planning application stage.
Education – Primary and Secondary Schools	Circa £838,071	Developer	Developer	TBC	MCC Education suggests there is currently capacity in primary schools within the locality. Additional provision required for 57 x secondary school pupils at Monmouth Comprehensive School. This sum and costs are indicative and will be reviewed at the planning application stage.
Green Infrastructure	TBC GI to be incorporated into site as part of detailed masterplanning of the site in accordance with Policy GI1. Commuted sum TBC (see notes).	**Developer**	Developer / Monmouthshire County Council.	TBC	To be provided on site. GI includes informal open space, amenity green space, parks and gardens, natural and semi natural space, community orchards and community growing. See policies GI1 and CI2 for further detail. The Councils preference is for GI is to be adopted by MCC a commuted sum will therefore apply – details to be determined at the planning application stage. Net biodiversity benefits e.g. bird/bat boxes to be provided on every home at the current cost of £100 per home. Further details to be

					determined at the planning application stage.
Nature Recovery	TBC Net Benefit for biodiversity to be provided on site as part of detailed master planning in accordance with policy NR1 Commuted sum TBC, if necessary	Developer	Monmouthshire County Council	TBC	To be provided on site, as far as is possible. Net Benefit for biodiversity relating to any loss or degradation and required compensation or net benefit and associated monitoring, management and maintenance in accordance with policy NR1. This is additional to the requirements outlined under GI as it relates directly to existing ecological interests impacted by development.
Wye Valley & Forest of Dean Bat Sites SAC Juvenile Sustenance Zone	Woodland planting to be incorporated within blue line of ownership. Commuted sum TBC (see notes).	Developer	Developer	TBC	Woodland buffer planting with well-designed public access to be provided, maintained, monitored and managed on the eastern edge of the site (in the blue line of ownership) to protect the Greater Horseshoe Bat Juvenile Sustenance Zone. A commuted sum will be required if the woodland planting is adopted by MCC, this will be considered at the time of the planning application.
Public Right of Way enhancements and connections	TBC	Developer	Developer	TBC	Details to be determined through Transport Assessment and Masterplanning.

Recreation and Open Space	TBC New neighbourhood play area and open space to be provided on site. Indicative cost of neighbourhood play area based on current requirements circa £160,000 + committed sum of circa £190,000. Off-site contributions may be required in accordance with the standards set out in Policy CI2. Commuted sum TBC (see notes).	Developer	Developer / Monmouthshire County Council	TBC	Exact level and type of provision will be determined as part of Masterplanning and will account for existing local provision, including any deficiencies. Recreation and Open Space includes childrens play areas, formal pitches and other outdoor sports, see Policy CI2 for further detail. Off-site contributions only required if sufficient public open space, play areas and adult recreation provision is not included within the site. The Councils preference is for Recreation and Open Space to be adopted by MCC and therefore a commuted sum will be required. This is to be calculated at the time of the planning application based on the layout and amount of open space.
Allotments	TBC	Developer	Developer	TBC	On site provision to be considered. Details to be determined at the planning application stage.

Drainage	TBC	Developer	Developer	TBC	Details to be determined at the planning application stage.
Water Supply/Sewerage	Hydraulic Modelling Assessment required for water supply network and public sewerage network.	Developer	Hydraulic Modelling Assessment (HMA) to be funded by Developer.	TBC HMA at planning application stage.	DCWW note there are no issues with foul flows being accommodated for this site at the Monmouth WwTW. Hydraulic Modelling Assessment required to ensure there is no detriment to existing customers supply and that there is sufficient hydraulic capacity to accommodate the site. If any works are required these would be developer funded via the requisition provisions of the Water Industry Act 1991. DCWW has confirmed upgrades to the Monmouth WwTW to include phosphate stripping capability in AMP 7 2020-2025. The impact of development on water quality will be scrutinised as part of the planning application in consultation with relevant bodies including NRW and DCWW to ensure no adverse impacts to the river SAC. Any development proposal will need to be in accordance with the Environmental Permit issued by NRW.

Key supporting information to include:

- Masterplan.
- Viability Assessment.

- Agricultural Land Classification Report.
- Ecology Assessments.
- Green Infrastructure and Landscape Assessments.
- Green Infrastructure Statement.
- Flood Consequences Assessment & Drainage Report.
- Highways and Transport Assessments.
- National Grid feasibility study.
- Hydraulic Modelling Assessment.

Further reports/surveys as necessary to accompany planning application.

Land at Penlanlas Farm, Abergavenny

Policy HA5: Land at Penlanlas Farm, Abergavenny			
Site Area	**Allocation Type**	**Total Homes**	**Phasing Tranche**
Circa 6.17ha	Residential	Total Homes: 100 Open Market Homes: 50 Affordable Homes: 50	Years 6 to 15

Site Description

Land at Penlanlas Farm is located to the north west of Abergavenny adjacent the Bannau Brycheiniog National Park (BBNP) eastern boundary. The site is bounded to the east and south by residential properties with Old Hereford Road to the west and an electrical substation and agricultural land to the north.

Key site issues and constraints	Key policy requirements
• Positioned within the landscape setting of Bannau Brycheiniog National Park (BBNP). • Site is located within the River Usk phosphorus catchment area.	• 50% affordable homes on site. • Net zero carbon homes. • Green infrastructure.

	• Sustainable transport/Active travel

Key Infrastructure requirements (including broad costs where known):

Infrastructure requirements	Estimated cost	Funding sources	Delivery body	Phasing/ delivery period	Notes
Active Travel Routes	TBC	Developer	Developer	Prior to first occupation	Details to be determined through Transport Assessment and Masterplanning. Internal layout and active travel routes within the site will be determined at the planning application stage in collaboration with active travel colleagues.
Highways and Sustainable Travel to include: • Access point on to Old Hereford Road • Old Hereford Road- speed limit revisions • Off-site highway infrastructure contributions as necessary including, local and strategic highway network improvements.	TBC	Developer	Developer	TBC	Details to be determined through Transport Assessment and Masterplanning.
Public transport financial contributions.	Circa £250,000	Developer	Regional and local bus providers	TBC	Financial contributions towards improved public transport and bus frequency. Cost may be subject to change, to be determined at the planning application stage.

Education – Primary and Secondary Schools.	TBC	Developer	Developer	TBC	MCC Education suggests there is currently capacity in both primary and secondary schools in the locality. This will be reviewed at the planning application stage to determine whether any costs are required.
Green Infrastructure.	TBC GI to be incorporated into site as part of detailed masterplanning of the site in accordance with Policy GI1. Commuted sum TBC (see notes).	Developer	Developer / Monmouthshire County Council.	TBC	To be provided on site. GI includes informal open space, amenity green space, parks and gardens, natural and semi natural space, community orchards and community growing. See policies GI1 and CI2 for further detail. The Councils preference is for GI is to be adopted by MCC a commuted sum will therefore apply – details to be determined at the planning application stage. Net biodiversity benefits e.g. bird/bat boxes to be provided on every home at the current cost of £100 per home. Further details to be determined at the planning application stage.
Nature Recovery	TBC Net Benefit for biodiversity to be provided on site as part of detailed master planning in accordance with policy NR1	Developer	Monmouthshire County Council	TBC	To be provided on site, as far as is possible. Net Benefit for biodiversity relating to any loss or degradation and required compensation or net benefit and associated monitoring, management and maintenance in accordance with policy NR1. This is additional to the requirements outlined under GI as it relates directly to existing ecological interests impacted by development.

	Commuted sum TBC, if necessary				
Public Right of Way enhancements and connections	TBC	Developer	Developer	TBC	Details to be determined through Transport Assessment and Masterplanning.
Recreation and Open Space	TBC Open space to be provided on site. Off-site contribution towards improvements to existing play provision at Underhill Crescent Playing Field (Based on current indicative cost circa £101,000). Further off-site contributions	Developer	Developer / Monmouthshire County Council	TBC	Exact level and type of provision will be determined as part of Masterplanning and will account for existing local provision, including any deficiencies. Recreation and Open Space includes childrens play areas, formal pitches and other outdoor sports, see Policy CI2 for further detail. Off-site contributions only required if sufficient public open space, play areas and adult recreation provision is not included within the site. The Councils preference is for Recreation and Open Space to be adopted by MCC and therefore a commuted sum will be required. This is to be calculated at the time of the planning application based on the layout and amount of open space.

	may be required in accordance with the standards set out in Policy CI2. Commuted sum TBC (see notes).				
Allotments	TBC	Developer	Developer	TBC	On site provision to be considered. Details to be determined at the planning application stage.
Drainage	TBC	Developer	Developer	TBC	Details to be determined at the planning application stage.
Water Supply/Sewerage	N/A	N/A	N/A	TBC	DCWW note there are no issues with water supply network or foul flows being accommodated for this site at the Llanfoist WwTW. DCWW has confirmed upgrades to the Llanfoist WwTW to include phosphate stripping capability in AMP 8 2025-2030. The impact of development on water quality will be scrutinised as part of the planning application in consultation with relevant bodies including NRW and DCWW to ensure no adverse impacts to the river SAC. Any development proposal will need to be in accordance with the Environmental Permit issued by NRW.

Key supporting information to include:
• Illustrative Masterplan. • Transport Assessment including active travel links and public transport enhancements. • Green Infrastructure and Landscape Assessments. • Green Infrastructure Statement. • Ecological Assessment. • Flood Consequence Assessment and Drainage Strategy. • Environmental Health Assessments including Air Quality, Noise Assessment and Land Contamination Strategy. • National Grid Feasibility Study. • Agricultural Land Classification Report. • Archaeological and Heritage Assessment. Further reports/surveys as necessary to accompany planning application.

Land at Rockfield Road, Monmouth

Policy HA6: Land at Rockfield Road, Monmouth			
Site Area	**Allocation Type**	**Total Homes**	**Phasing Tranche**
Circa 1.5ha	Residential	Total Homes: 60 Open Market Homes: 30 Affordable Homes: 30	Years 11 to 15
Site Description			
Land at Rockfield Road is located on the north-western edge of Monmouth. This site is located adjacent to a residential site on Rockfield Road with extant planning permission for 70 homes and sits neatly within a gap between this permitted site to the east and existing residential development to the south and west.			

Key site issues and constraints	Key policy requirements
• Adjacent public footpath must be linked into the site to provide connectivity. • Green buffer on the edge of the site must be retained to minimise any potential landscape impact on the wider surroundings. • Site is located within the River Wye phosphorus catchment area.	• 50% affordable homes on site. • Net zero carbon homes. • Sustainable transport/Active travel • Green infrastructure.

Key Infrastructure requirements (including broad costs where known):

Infrastructure requirements	Estimated cost	Funding sources	Delivery body	Phasing/ delivery period	Notes
Active Travel Routes	TBC	Developer	Developer	Prior to first occupation	Details to be determined through Transport Assessment and Masterplanning. Internal layout and active travel routes within the site will be determined at the planning application stage in collaboration with active travel colleagues.
Highways and Sustainable Travel to include: • Off-site highway infrastructure contributions as necessary including, local and strategic highway network improvements.	TBC	Developer	Developer	TBC	Details to be considered through Transport Assessment and determined at the planning application stage.

Public transport financial contributions.	Circa £150,000	Developer	Regional and local bus providers	TBC	Financial contributions towards improved public transport and bus frequency. Cost may be subject to change, to be determined at the planning application stage.
Education – Primary and Secondary Schools	Circa £191,139	Developer	Developer	TBC	MCC Education suggests there is currently capacity in primary schools within the locality. Additional provision required for 13 x secondary school pupils at Monmouth Comprehensive School. This sum and costs are indicative and will be reviewed at the planning application stage.
Green Infrastructure	TBC GI to be incorporated into site as part of detailed masterplanning of the site in accordance with Policy GI1. Commuted sum TBC (see notes).	Developer	Developer / Monmouthshire County Council.	TBC	To be provided on site. GI includes informal open space, amenity green space, parks and gardens, natural and semi natural space, community orchards and community growing. See policies GI1 and CI2 for further detail. The Councils preference is for GI is to be adopted by MCC a commuted sum will therefore apply – details to be determined at the planning application stage. Net biodiversity benefits e.g. bird/bat boxes to be provided on every home at the current cost of £100 per home. Further details to be determined at the planning application stage.

Nature Recovery	TBC Net Benefit for biodiversity to be provided on site as part of detailed master planning in accordance with policy NR1 Commuted sum TBC, if necessary	Developer	Monmouthshire County Council	TBC	To be provided on site, as far as is possible. Net Benefit for biodiversity relating to any loss or degradation and required compensation or net benefit and associated monitoring, management and maintenance in accordance with policy NR1. This is additional to the requirements outlined under GI as it relates directly to existing ecological interests impacted by development.
Recreation and Open Space	Off-site contribution towards existing play provision at Rockfield Estate central open space (Based on current indicative cost circa £60,000). Further off-site contributions may be required in accordance with the standards set out in CI2.	Developer	Developer / Monmouthshire County Council	TBC	Recreation and Open Space includes childrens play areas, formal pitches and other outdoor sports, see Policy CI2 for further detail. Recreation Open Space is provided as part of the adjacent site and therefore no provision on site and a subsequent need for off-site contributions. If a commuted sum is required this is to be calculated at the time of the planning application based on the layout and amount of open space.

	Commuted sum TBC (see notes).				
Public Right of Way enhancements and connections	TBC	Developer	Developer	TBC	Details to be determined through Transport Assessment and Masterplanning.
Allotments	TBC	Developer	Developer	TBC	On site provision to be considered. Details to be determined at the planning application stage.
Drainage	TBC	Developer	Developer	TBC	Details to be determined at the planning application stage.
Water Supply/Sewerage	N/A	N/A	N/A	TBC	DCWW note there are no issues with water supply network or foul flows being accommodated for this site at the Monmouth WwTW. DCWW has confirmed upgrades to the Monmouth WwTW to include phosphate stripping capability in AMP 7 2020-2025. The impact of development on water quality will be scrutinised as part of the planning application in consultation with relevant bodies including NRW and DCWW to ensure no adverse impacts to the river SAC. Any development proposal will need to be in accordance with the Environmental Permit issued by NRW.

Key supporting information to include:

- Masterplan.

- Viability Assessment.
- Agricultural Land Classification Report.
- Ecology Assessments.
- Green Infrastructure and Landscape Assessments.
- Green Infrastructure Statement.
- Flooding Assessment & Drainage Report.
- Relevant Heritage Assessments.
- Highways and Transport Assessments.
- National Grid feasibility study.

Further reports/surveys as necessary to accompany planning application.

Land at Drewen Farm, Monmouth

Policy HA7: Land at Drewen Farm, Monmouth			
Site Area	**Allocation Type**	**Total Homes**	**Phasing Tranche**
Circa 6.6ha	Residential	Total Homes: 110 Open Market Homes: 55 Affordable Homes: 55	Years 6 to 15
Site Description			
Land at Drewen Farm wraps around the Kingswood Gate site located to the south and west, with Watery Lane to the east and agricultural land to the north. It forms the remaining part of the adopted LDP Wonastow Road housing site in Monmouth known as Kingswood Gate.			
Key site issues and constraints		**Key policy requirements**	
• Public footpath links to Watery Lane are essential.		• 50% affordable homes on site.	

• Green buffer in and around the site must be retained to minimise any potential impact on ecology and landscape. • Adjacent to a SINC. Additional GI connectivity and buffers required between built development and the SINC. • Site is located within the River Wye phosphorus catchment area.	• Net zero carbon homes. • Sustainable transport/Active travel • Green infrastructure.

Key Infrastructure requirements (including broad costs where known):

Infrastructure requirements	Estimated cost	Funding sources	Delivery body	Phasing/ delivery period	Notes
Active Travel Routes to include: • Links into adjacent Kingswood Gate site.	TBC	Developer	Developer	Prior to first occupation	Details to be determined through Transport Assessment and Masterplanning. Internal layout and active travel routes within the site will be determined at the planning application stage in collaboration with active travel colleagues.
Highways and Sustainable Travel to include: • Off-site highway infrastructure contributions as necessary including, local and strategic highway network improvements.	TBC	Developer	Developer	TBC	Details to be determined through Transport Assessment and Masterplanning.

Public transport financial contributions.	Circa £275,000	Developer	Regional and local bus providers	TBC	Financial contributions towards improved public transport and bus frequency. Cost may be subject to change, to be determined at the planning application stage.
Education – Primary and Secondary Schools.	Circa £338,169	Developer	Developer	TBC	MCC Education suggests there is currently capacity in primary schools within the locality. Additional provision required for 23 x secondary school pupils at Monmouth Comprehensive School. This sum and costs are indicative and will be reviewed at the planning application stage.
Green Infrastructure	TBC GI to be incorporated into site as part of detailed masterplanning of the site in accordance with Policy GI1. Commuted sum TBC (see notes).	Developer	Developer / Monmouthshire County Council.	TBC	To be provided on site. GI includes informal open space, amenity green space, parks and gardens, natural and semi natural space, community orchards and community growing. See policies GI1 and CI2 for further detail. The Councils preference is for GI is to be adopted by MCC a commuted sum will therefore apply – details to be determined at the planning application stage. Net biodiversity benefits e.g. bird/bat boxes to be provided on every home at the current cost of £100 per home. Further details to be determined at the planning application stage.
Nature Recovery	TBC Net Benefit for biodiversity to be	Developer	Monmouthshire County Council	TBC	To be provided on site, as far as is possible. Net Benefit for biodiversity relating to any loss or degradation and required compensation or net

	provided on site as part of detailed master planning in accordance with policy NR1 Commuted sum TBC, if necessary				benefit and associated monitoring, management and maintenance in accordance with policy NR1. This is additional to the requirements outlined under GI as it relates directly to existing ecological interests impacted by development.
Public Right of Way enhancements and connections	TBC	Developer	Developer	TBC	Details to be determined through Transport Assessment and Masterplanning.
Recreation and Open Space	TBC Open space to be provided on site. Off-site contribution towards existing play provision at Rockfield central open space (Based on current indicative cost circa £111,000). Further off-site contributions may	Developer	Developer / Monmouthshire County Council	TBC	Exact level and type of provision will be determined as part of Masterplanning and will account for existing local provision, including any deficiencies. Recreation and Open Space includes childrens play areas, formal pitches and other outdoor sports, see Policy CI2 for further detail. Off-site contributions only required if sufficient public open space, play areas and adult recreation provision is not included within the site. The Councils preference is for Recreation and Open Space to be adopted by MCC and therefore a commuted sum will be required. This is to be calculated at the time of the planning application based on the layout and amount of open space.

	be required in accordance with the standards set out in Policy CI2. Commuted sum TBC (see notes).				
Allotments	TBC	Developer	Developer	TBC	On site provision to be considered. Details to be determined at the planning application stage.
Drainage	TBC	Developer	Developer	TBC	Details to be determined at the planning application stage.
Water Supply/Sewerage	Hydraulic Modelling Assessment required for water supply network and public sewerage network.	Developer	Hydraulic Modelling Assessment (HMA) to be funded by Developer.	TBC HMA at planning application stage.	DCWW note there are no issues with foul flows being accommodated for this site at the Monmouth WwTW. Hydraulic Modelling Assessment required to ensure there is no detriment to existing customers supply and that there is sufficient hydraulic capacity to accommodate the site. If any works are required these would be developer funded via the requisition provisions of the Water Industry Act 1991. DCWW has confirmed upgrades to the Monmouth WwTW to include phosphate stripping capability in AMP 7 2020-2025. The impact of development on water quality will be scrutinised as part of the planning application in consultation with relevant bodies including NRW and DCWW to ensure no adverse impacts to the river SAC. Any development

					proposal will need to be in accordance with the Environmental Permit issued by NRW.

Key supporting information to include:

- Masterplan.
- Viability Assessment.
- Agricultural Land Classification Report.
- Ecology Assessments.
- Green Infrastructure and Landscape Assessments.
- Green Infrastructure Statement.
- Flooding Assessment & Drainage Report.
- Relevant Heritage Assessments.
- Highways and Transport Assessments.
- National Grid feasibility study.
- Hydraulic Modelling Assessment.

Further reports/surveys as necessary to accompany planning application.

Tudor Road, Monmouth

Policy HA8: Tudor Road, Monmouth			
Site Area	**Allocation Type**	**Total Homes**	**Phasing Tranche**
Circa 2.1ha	Residential	Total Homes: 50 Open Market Homes: 25 Affordable Homes: 25	Years 6 to 10

Site Description
The Tudor Road site is located on the eastern side of Wyesham in Monmouth. Existing residential properties are located to the south and west of the site with agricultural land to the north and east. The site is located adjacent to the Wye Valley National Landscape (AONB).

Key site issues and constraints	Key policy requirements
• Linear hedgerow feature to be retained due to importance with foraging and commuting bats associated with the Wye Valley and Forest of Dean Bat Sites SAC. • Adjacent to the Wye Valley National Landscape (AONB). • Re-engineering of the existing Tudor Road junction is required, providing access to 7-19 Tudor Road along with relocation of the associated residents' off-street parking. • Overland water flows from land above site, management of these flows must be incorporated into the scheme. • Site is located within the River Wye phosphorus catchment area.	• 50% affordable homes on site. • Net zero carbon homes. • Sustainable transport/Active travel • Green infrastructure.

Key Infrastructure requirements (including broad costs where known):

Infrastructure requirements	Estimated cost	Funding sources	Delivery body	Phasing/ delivery period	Notes
Active Travel Routes to include: • Links to nearby Active Travel route MCC-M14A.	TBC	Developer	Developer	Prior to first occupation	Details to be determined through Transport Assessment and Masterplanning. Internal layout and active travel routes within the site will be determined at the planning application stage in collaboration with active travel colleagues.

Highways and Sustainable Travel to include: • Off-site highway infrastructure contributions as necessary including, local and strategic highway network improvements.	TBC	Developer	Developer	TBC	Details to be determined through Transport Assessment and Masterplanning.
Public transport financial contributions.	Circa £125,000	Developer	Regional and local bus providers	TBC	Financial contributions towards improved public transport and bus frequency. Cost may be subject to change, to be determined at the planning application stage.
Education – Primary and Secondary Schools.	Circa £161,733	Developer	Developer	TBC	MCC Education suggests there is currently capacity in primary schools within the locality. Additional provision required for 11 x secondary school pupils at Monmouth Comprehensive School. This sum and costs are indicative and will be reviewed at the planning application stage.
Green Infrastructure	TBC GI to be incorporated into site as part of detailed masterplanning of the site in	Developer	Developer / Monmouthshire County Council.	TBC	To be provided on site. GI includes informal open space, amenity green space, parks and gardens, natural and semi natural space, community orchards and community growing. See policies GI1 and CI2 for further detail. The Councils preference is for GI is to be adopted

	accordance with Policy GI1. Commuted sum TBC (see notes).				by MCC a commuted sum will therefore apply – details to be determined at the planning application stage. PPW12 Chapter 6 indicates mitigation ratios for individual tree, hedgerow and woodland loss. Net biodiversity benefits e.g. bird/bat boxes to be provided on every home at the current cost of £100 per home – details to be determined at the planning application stage.
Nature Recovery	TBC Net Benefit for biodiversity to be provided on site as part of detailed master planning in accordance with policy NR1 Commuted sum TBC, if necessary	Developer	Monmouthshire County Council	TBC	To be provided on site, as far as is possible. Net Benefit for biodiversity relating to any loss or degradation and required compensation or net benefit and associated monitoring, management and maintenance in accordance with policy NR1. This is additional to the requirements outlined under GI as it relates directly to existing ecological interests impacted by development.
Public Right of Way enhancements and connections	TBC	Developer	Developer	TBC	Details to be determined through Transport Assessment and Masterplanning.

Recreation and Open Space	TBC Allotment and open space to be provided on site. Off-site contribution towards improvements to existing provision at Tudor Road (Based on current indicative cost circa £50,000). Further off-site contributions may be required in accordance with the standards set out in Policy CI2. Commuted sum TBC (see notes).	Developer	Developer / Monmouthshire County Council	TBC	Exact level and type of provision will be determined as part of Masterplanning and will account for existing local provision, including any deficiencies. Recreation and Open Space includes childrens play areas, formal pitches and other outdoor sports, see Policy CI2 for further detail. Off-site contributions only required if sufficient public open space, play areas and adult recreation provision is not included within the site. The Councils preference is for Recreation and Open Space to be adopted by MCC and therefore a commuted sum will be required. This is to be calculated at the time of the planning application based on the layout and amount of open space.
Allotments	TBC	Developer	Developer	TBC	On site provision to be considered. Details to be determined at the planning application stage.

Drainage	TBC	Developer	Developer	TBC	Details to be determined at the planning application stage.
Water Supply/Sewerage	N/A	N/A	N/A	TBC	DCWW note there are no issues with water supply network or foul flows being accommodated for this site at the Monmouth WwTW. DCWW has confirmed upgrades to the Monmouth WwTW to include phosphate stripping capability in AMP 7 2020-2025. The impact of development on water quality will be scrutinised as part of the planning application in consultation with relevant bodies including NRW and DCWW to ensure no adverse impacts to the river SAC. Any development proposal will need to be in accordance with the Environmental Permit issued by NRW.

Key supporting information to include:

- Masterplan.
- Viability Assessment.
- Ecology Assessments.
- Green Infrastructure and Landscape Assessments.
- Green Infrastructure Statement.
- Flooding Assessment & Drainage Report.
- Highways and Transport Assessments.
- National Grid feasibility study.

Further reports/surveys as necessary to accompany planning application.

Land at former MoD, Caerwent

Policy HA9: Land at former MoD land, Caerwent			
Site Area	**Allocation Type**	**Total Homes**	**Phasing Tranche**
Circa 4.2ha	Mixed-Use Residential Commercial B1	Total Homes: 40 Open Market Homes: 20 Affordable Homes: 20	Years 6 to 10

Site Description

Land at the former Ministry of Defence Site is a brownfield site on the north-eastern edge of Caerwent, north of the A48. The site is surrounded by agricultural land with two farms either side of the site. There is an existing large derelict red brick building and other utilitarian buildings within the site.

Key site issues and constraints	Key policy requirements
• The site which has been unoccupied for several years has been neglected and as such has regenerating scrubland/overgrown vegetation within the site and along the boundary with the A48. Protected and priority species and habitats have been identified within the site including a maternity roost for lesser horseshoe bats. • Location within the 12.6km Core Recreational Catchment Zone for the Severn Estuary European Marine Site, financial contributions may therefore be required as part of a mitigation strategy.	• 50% affordable homes on site. • Net zero carbon homes. • Sustainable transport/Active travel • Green infrastructure.

Key Infrastructure requirements (including broad costs where known):

Infrastructure requirements	Estimated cost	Funding sources	Delivery body	Phasing/ delivery period	Notes
Active Travel Routes	TBC	Developer	Developer	Prior to first occupation	Details to be determined through Transport Assessment and Masterplanning. Internal layout and active travel routes within the site will be determined at the planning application stage in collaboration with active travel colleagues.
Highways and Sustainable Travel to include: • Access onto A48 • Off-site highway infrastructure contributions as necessary including, local and strategic highway network improvements.	TBC	Developer	Developer	TBC	Details to be determined through Transport Assessment and Masterplanning.
Public transport financial contributions.	Circa £100,000	Developer	Regional and local bus providers	TBC	Financial contributions towards improved public transport and bus frequency. Cost may be subject to change, to be determined at the planning application stage.
Education – Primary and Secondary Schools.	TBC	Developer	Developer	TBC	MCC Education suggests there is currently capacity in both primary and secondary schools in the locality. This will be reviewed at the planning application stage to determine whether any costs are required. There may also be a need for school transport costs, the cost of which also to be determined at the planning application stage.

Green Infrastructure	TBC GI to be incorporated into site as part of detailed masterplanning of the site in accordance with Policy GI1. Commuted sum TBC (see notes).	Developer	Developer / Monmouthshire County Council.	TBC	To be provided on site. GI includes informal open space, amenity green space, parks and gardens, natural and semi natural space, community orchards and community growing. See policies GI1 and CI2 for further detail. The Councils preference is for GI is to be adopted by MCC a commuted sum will therefore apply – details to be determined at the planning application stage. PPW12 Chapter 6 indicates mitigation ratios for individual tree, hedgerow and woodland loss. Net biodiversity benefits e.g. bird/bat boxes to be provided on every home at the current cost of £100 per home. Further details to be determined at the planning application stage.
Nature Recovery	TBC Net Benefit for biodiversity to be provided on site as part of detailed master planning in accordance	Developer	Developer/ Monmouthshire County Council	TBC	To be provided on site, as far as is possible. Net Benefit for biodiversity relating to any loss or degradation and required compensation or net benefit and associated monitoring, management and maintenance in accordance with policy NR1. This is additional to the requirements outlined under GI as it relates directly to existing ecological interests impacted by development.

	with policy NR1 Commuted sum TBC, if necessary				Of note here is the lesser horseshoe maternity roost that will need to be retained and managed in perpetuity by the developer.
Severn Estuary European Marine Site – financial contribution	TBC	Developer	Monmouthshire County Council	TBC	Site is located in the 12.6km core recreational catchment zone for the Severn Estuary European Marine Site, a financial contribution may be required as part of the mitigation strategy for the protected site to reduce recreational pressure on the features of the Estuary.
Public Right of Way enhancements and connections	TBC	Developer	Developer	TBC	Details to be determined through Transport Assessment and Masterplanning.
Recreation and Open Space	TBC Allotment and open space to be provided on site. Off-site contribution towards existing play area at Lawrence Crescent	Developer	Developer / Monmouthshire County Council	TBC	Exact level and type of provision will be determined as part of Masterplanning and will account for existing local provision, including any deficiencies. Recreation and Open Space includes childrens play areas, formal pitches and other outdoor sports, see Policy CI2 for further detail. Off-site contributions only required if sufficient public open space, play areas and adult recreation provision is not included within the site. The Councils preference is for Recreation and Open Space to be adopted by MCC and therefore a

	(Based on current indicative cost circa £40,000). Further off-site contributions may be required in accordance with the standards set out in Policy CI2. Commuted sum TBC (see notes).				commuted sum will be required. This is to be calculated at the time of the planning application based on the layout and amount of open space.
Drainage	TBC	Developer	Developer	TBC	Details to be determined at the planning application stage.
Water Supply/Sewerage	TBC	Developer	Developer	TBC	DCWW note there are no issues with water supply network being accommodated for this site at the Caerwent WwTW. The foul flows would however overload the Caerwent WwTW and there are no reinforcement works proposed within the current AMP7. As such, for this site to progress then it will be necessary for a Developer Impact Assessment to be

					undertaken on the WwTW which will conclude any reinforcement works required.

Key supporting information to include:

- Masterplan.
- Viability Assessment.
- Ecology Assessments.
- Green Infrastructure and Landscape Assessments.
- Green Infrastructure Statement.
- Flooding and Drainage Assessments.
- Highways and Transport Assessments.
- Environmental Health Assessments.
- National Grid feasibility study.
- Hydraulic Modelling Assessment.

Further reports/surveys as necessary to accompany planning application.

Land south of Monmouth Road, Raglan

Policy HA10: Land south of Monmouth Road, Raglan			
Site Area	**Allocation Type**	**Total Homes**	**Phasing Tranche**
Circa 4.5ha	Residential	Total Homes: 54 Open Market Homes: 27 Affordable Homes: 27	Years 6 to 15

Site Description
Land south of Monmouth Road, Raglan is located to the south-east of Raglan. on the eastern edge of Raglan. The site borders Raglan Conservation Area located to the south of Raglan Castle. The site benefits from less than 15 minutes walking time to Raglan's centre, with other key services and facilities including a school in closer proximity.

Key site issues and constraints	Key policy requirements
• Located within the setting of Raglan Castle Scheduled Ancient Monument and Grade 1 Building and Raglan Castle Registered Historic Park and Garden. • The site is located adjacent to Raglan Conservation Area. • Site is located within the River Usk phosphorus catchment area.	• 50% affordable homes on site. • Net zero carbon homes. • Sustainable transport/Active travel • Green infrastructure.

Key Infrastructure requirements (including broad costs where known):

Infrastructure requirements	Estimated cost	Funding sources	Delivery body	Phasing/ delivery period	Notes
Active Travel Routes	TBC	Developer	Developer	Prior to first occupation	Details to be determined through Transport Assessment and Masterplanning. Internal layout and active travel routes within the site will be determined at the planning application stage in collaboration with active travel colleagues.
Highways and Sustainable Travel to include: • Access point on to Monmouth Road.	TBC	Developer	Developer	TBC	Details to be determined through Transport Assessment and Masterplanning.

• Emergency Access Point – Station Road. • Off-site highway infrastructure contributions as necessary including, local and strategic highway network improvements.					
Public transport financial contributions.	Circa £135,000	Developer	Regional and local bus providers	TBC	Financial contributions towards improved public transport and bus frequency. Cost may be subject to change, to be determined at the planning application stage.
Education – Primary and Secondary Schools.	Circa £176,436	Developer	Developer	TBC	MCC Education suggests there is currently capacity in primary schools within the locality. Additional provision required for 12 x secondary school pupils at Monmouth Comprehensive School. This sum and costs are indicative and will be reviewed at the planning application stage.
Green Infrastructure	TBC GI to be incorporated into site as part of detailed masterplanning of the site in	Developer	Developer / Monmouthshire County Council.	TBC	To be provided on site. GI includes informal open space, amenity green space, parks and gardens, natural and semi natural space, community orchards and community growing. See policies GI1 and CI2 for further detail. The Councils preference is for GI is to be

	accordance with Policy GI1. Commuted sum TBC (see notes).				adopted by MCC a commuted sum will therefore apply – details to be determined at the planning application stage. Net biodiversity benefits e.g. bird/bat boxes to be provided on every home at the current cost of £100 per home. Further details to be determined at the planning application stage.
Nature Recovery	TBC Net Benefit for biodiversity to be provided on site as part of detailed master planning in accordance with policy NR1 Commuted sum TBC, if necessary	Developer	Monmouthshire County Council	TBC	To be provided on site, as far as is possible. Net Benefit for biodiversity relating to any loss or degradation and required compensation or net benefit and associated monitoring, management and maintenance in accordance with policy NR1. This is additional to the requirements outlined under GI as it relates directly to existing ecological interests impacted by development.
Public Right of Way enhancements and connections	TBC	Developer	Developer	TBC	Details to be determined through Transport Assessment and Masterplanning.
Recreation and Open Space	TBC New local equipped play	Developer	Developer / Monmouthshire County Council	TBC	Exact level and type of provision will be determined as part of Masterplanning and will account for existing local provision, including any deficiencies.

	area and open space to be provided on site. Indicative cost of local equipped play area based on current requirements circa £85,000 + committed sum of circa £95,000. Off-site contributions may be required in accordance with the standards set out in Policy CI2. Commuted sum TBC (see notes).				Recreation and Open Space includes childrens play areas, formal pitches and other outdoor sports, see Policy CI2 for further detail. Off-site contributions only required if sufficient public open space, play areas and adult recreation provision is not included within the site. The Councils preference is for Recreation and Open Space to be adopted by MCC and therefore a commuted sum will be required. This is to be calculated at the time of the planning application based on the layout and amount of open space.
Allotments	TBC	Developer	Developer	TBC	On site provision to be considered. Details to be determined at the planning application stage.

Drainage	TBC	Developer	Developer	TBC	Details to be determined at the planning application stage.
Water Supply/Sewerage	N/A	N/A	N/A	N/A	DCWW note there are no issues with water supply network or foul flows being accommodated for this site at the Raglan WwTW. From a phosphorus perspective, NRW have completed the Environmental Permit review process and this proposal would be accommodated within the existing capacity of the permit.

Key supporting information to include:

- Heritage Assessment
- Agricultural Land Classification Report
- Flood Consequence Assessment and Drainage Strategy
- Transport Assessment including Active Travel links and public transport enhancements.
- Utilities Note
- Ecological Assessments.
- Green Infrastructure and Landscape Assessments.
- Green Infrastructure Statement.
- Environmental Health Assessments including Noise Assessment, Land Contamination Strategy and Air Quality Assessment.

Further reports/surveys as necessary to accompany planning application.

Land east of Burrium Gate, Usk

Policy HA11: Land east of Burrium Gate, Usk			
Site Area	**Allocation Type**	**Total Homes**	**Phasing Tranche**
Circa 2.6ha	Residential	Total Homes: 40 Open Market Homes: 20 Affordable Homes: 20	Years 6 to 10
Site Description			
Land east of Burrium Gate is located at the eastern edge of Usk, north of Monmouth Road. To the west and south of the site are existing residential properties with agricultural fields to the north and east.			
Key site issues and constraints		**Key policy requirements**	
• Proximity to Usk's air quality management area (AQMA). • The site's impact on overland drainage flow. • Site is located within the River Usk phosphorus catchment area.		• 50% affordable homes on site. • Net zero carbon homes. • Green infrastructure. • Sustainable transport/Active travel	

Key Infrastructure requirements (including broad costs where known):					
Infrastructure requirements	**Estimated cost**	**Funding sources**	**Delivery body**	**Phasing/ delivery period**	**Notes**
Active Travel Routes	TBC	Developer	Developer	Prior to first occupation	Details to be determined through Transport Assessment and Masterplanning. Internal layout and active travel routes within the site will be determined at the planning application

					stage in collaboration with active travel colleagues.
Highways and Sustainable Travel to include: • Access point onto Monmouth Road. • Speed limit revisions on Monmouth Road • Off-site highway infrastructure contributions as necessary including, local and strategic highway network improvements.	TBC	Developer	Developer	TBC	Details to be determined through Transport Assessment and Masterplanning.
Public transport financial contributions.	Circa £100,000	Developer	Regional and local bus providers	TBC	Financial contributions towards improved public transport and bus frequency. Cost may be subject to change, to be determined at the planning application stage.
Education – Primary and Secondary Schools.	Circa £117,624	Developer	Developer	TBC	MCC Education suggests there is currently capacity in primary schools within the locality. Additional provision required for 8 x secondary school pupils at Monmouth Comprehensive School. This sum and costs are indicative and will be reviewed at the planning application stage.

Green Infrastructure	TBC GI to be incorporated into site as part of detailed masterplanning of the site in accordance with Policy GI1. Commuted sum TBC (see notes).	Developer	Developer / Monmouthshire County Council.	TBC	To be provided on site. GI includes informal open space, amenity green space, parks and gardens, natural and semi natural space, community orchards and community growing. See policies GI1 and CI2 for further detail. The Councils preference is for GI is to be adopted by MCC a commuted sum will therefore apply – details to be determined at the planning application stage. PPW12 Chapter 6 indicates mitigation ratios for individual tree, hedgerow and woodland loss. Net biodiversity benefits e.g. bird/bat boxes to be provided on every home at the current cost of £100 per home. Further details to be determined at the planning application stage.
Nature Recovery	TBC Net Benefit for biodiversity to be provided on site as part of detailed master planning in accordance with policy NR1	Developer	Monmouthshire County Council	TBC	To be provided on site, as far as is possible. Net Benefit for biodiversity relating to any loss or degradation and required compensation or net benefit and associated monitoring, management and maintenance in accordance with policy NR1.

	Commuted sum TBC, if necessary				This is additional to the requirements outlined under GI as it relates directly to existing ecological interests impacted by development.
Public Right of Way enhancements and connections	TBC	Developer	Developer	TBC	Details to be determined through Transport Assessment and Masterplanning.
Recreation and Open Space	Open space to be provided on site. Off-site contribution towards improvements to existing play area at Castle Oaks (Based on current indicative cost circa £40,000). Further off-site contributions may be required in accordance with the standards set out in Policy CI2. Commuted sum TBC (see notes).	Developer	Developer / Monmouthshire County Council	TBC	Exact level and type of provision will be determined as part of Masterplanning and will account for existing local provision, including any deficiencies. Recreation and Open Space includes childrens play areas, formal pitches and other outdoor sports, see Policy CI2 for further detail. Off-site contributions only required if sufficient public open space, play areas and adult recreation provision is not included within the site. The Councils preference is for Recreation and Open Space to be adopted by MCC and therefore a commuted sum will be required. This is to be calculated at the time of the planning application based on the layout and amount of open space.

Drainage	TBC	Developer	Developer	TBC	Details to be determined at the planning application stage following details relating to a scheme for the management of overland flows from adjacent land.
Water Supply/Sewerage	N/A	N/A	N/A	TBC	DCWW note there are no issues with water supply network or foul flows being accommodated for this site at the Usk WwTW provided development takes place after March 2025. From a phosphorus perspective, NRW have completed the Environmental Permit review process and this proposal would be accommodated within the existing capacity of the permit.

Key supporting information to include:

- Masterplan.
- Viability Assessment.
- Agricultural Land Classification Report.
- Ecological Assessments.
- Green Infrastructure and Landscape Assessments.
- Green Infrastructure Statement.
- Archaeology and Heritage Assessments.
- Flooding and Drainage Assessments.
- Highway and Transport Assessments.
- Environmental Health Assessments including Air Quality.

- National Grid feasibility study.

Further reports/surveys as necessary to accompany planning application.

Land west of Trem yr Ysgol, Penperlleni

Policy HA12: Land west of Trem yr Ysgol, Penperlleni			
Site Area	**Allocation Type**	**Total Homes**	**Phasing Tranche**
Circa 3.4ha	Residential	Total Homes: 42 Open Market Homes: 21 Affordable Homes: 21	Years 11 to 15

Site Description

Land west of Trem yr Ysgol is located on the south-western edge of Penperlleni. An existing residential development is located to the east of the site with agricultural land to the south and west. The A4042 is located to the north of the site with agricultural land beyond in the backdrop of the Bannau Brycheiniog National Park (BBNP).

Key site issues and constraints	Key policy requirements
• The site is bounded by the Ffynnon Ddu watercourse along the eastern and southern boundaries. • The site is also within the River Usk phosphorus sensitive catchment area.	• 50% affordable homes on site. • Net zero carbon homes. • Sustainable transport/Active travel • Green infrastructure.

Key Infrastructure requirements (including broad costs where known):

Infrastructure requirements	Estimated cost	Funding sources	Delivery body	Phasing/ delivery period	Notes
Active Travel Routes	TBC	Developer	Developer	Prior to first occupation	Details to be determined through Transport Assessment and Masterplanning. Internal layout and active travel routes within the site will be determined at the planning application stage in collaboration with active travel colleagues.
Highways and Sustainable Travel to include: • Off-site highway infrastructure contributions as necessary including, local and strategic highway network improvements.	TBC	Developer	Developer	TBC	Details to be determined through Transport Assessment.
Public transport financial contributions.	Circa £105,000	Developer	Regional and local bus providers	TBC	Financial contributions towards improved public transport and bus frequency. Cost may be subject to change, to be determined at the planning application stage.
Education – Primary and Secondary Schools.	TBC	Developer	Developer	TBC	MCC Education suggests there is currently capacity in both the primary and secondary schools in the locality. This will be reviewed at the planning

					application stage to determine whether any costs are required.
Green Infrastructure	TBC GI to be incorporated into site as part of detailed masterplanning of the site in accordance with Policy GI1. Commuted sum TBC (see notes).	Developer	Developer / Monmouthshire County Council.	TBC	To be provided on site. GI includes informal open space, amenity green space, parks and gardens, natural and semi natural space, community orchards and community growing. See policies GI1 and CI2 for further detail. The Councils preference is for GI is to be adopted by MCC a commuted sum will therefore apply – details to be determined at the planning application stage. PPW12 Chapter 6 indicates mitigation ratios for individual tree, hedgerow and woodland loss. Net biodiversity benefits e.g. bird/bat boxes to be provided on every home at the current cost of £100 per home. Further details to be determined at the planning application stage.
Nature Recovery	TBC	Developer	Monmouthshire County Council	TBC	To be provided on site, as far as is possible.

	Net Benefit for biodiversity to be provided on site as part of detailed master planning in accordance with policy NR1 Commuted sum TBC, if necessary				Net Benefit for biodiversity relating to any loss or degradation and required compensation or net benefit and associated monitoring, management and maintenance in accordance with policy NR1. This is additional to the requirements outlined under GI as it relates directly to existing ecological interests impacted by development.
Public Right of Way enhancements and connections	TBC	Developer	Developer	TBC	Details to be determined through Transport Assessment and Masterplanning.
Recreation and Open Space	Open space to be provided on site. Off-site contributions towards improvements to existing play area at Goytre playing field (Based on current indicative cost circa £42,000). Further off-site contributions may be	Developer	Developer / Monmouthshire County Council	TBC	Exact level and type of provision will be determined as part of Masterplanning and will account for existing local provision, including any deficiencies. Recreation and Open Space includes childrens play areas, formal pitches and other outdoor sports, see Policy CI2 for further detail. Off-site contributions only required if sufficient public open space, play areas and adult recreation provision is not included within the site.

	required in accordance with the standards set out in Policy CI2. Commuted sum TBC (see notes).				The Councils preference is for Recreation and Open Space to be adopted by MCC and therefore a commuted sum will be required. This is to be calculated at the time of the planning application based on the layout and amount of open space.
Drainage	TBC	Developer	Developer	TBC	Details to be determined at the planning application stage.
Water Supply/Sewerage	N/A	N/A	N/A	N/A	DCWW note there are no issues with water supply network or foul flows being accommodated for this site at the Goytre WwTW. From a Phosphorus perspective NRW have completed the Environmental Permit review process and this proposal would be accommodated within the existing capacity of the permit.

Key supporting information to include:

- Masterplan.
- Viability Assessment.
- Agricultural Land Classification Report.
- Ecological Assessments.
- Green Infrastructure and Landscape Assessments.

- Green Infrastructure Statement.
- Archaeology and Heritage Assessments.
- Flooding and Drainage Assessments.
- Highway and Transport Assessments.
- Environmental Health Assessments.
- National Grid feasibility study.

Further reports/surveys as necessary to accompany planning application .

Land adjacent to Piercefield Public House, St. Arvans

Policy HA13: Land adjacent to Piercefield Public House, St. Arvans			
Site Area	**Allocation Type**	**Total Homes**	**Phasing Tranche**
Circa 1.1ha	Residential	Total Homes: 16 Open Market Homes: 8 Affordable Homes: 8	Years 6 to 10

Site Description

Land adjacent to Piercefield Public House is located to the southern edge of St Arvans, west of the A466. Residential development and the public house are located to the north of the site with agricultural land to the south and west. The site is located within the Wye Valley National Landscape (AONB).

Key site issues and constraints	Key policy requirements
• Located within the Wye Valley National Landscape (AONB). • The site is within the Otter Hole Regionally Important Geodiversity Sites (RIGS).	• 50% affordable homes on site. • Net zero carbon homes. • Sustainable transport/Active travel as appropriate. • Green infrastructure.

• Site is located within 12.6km Core Recreational Catchment Zone for the Severn Estuary European Marine site, financial contributions may therefore be required as part of a mitigation strategy.	

Key Infrastructure requirements (including broad costs where known):

Infrastructure requirements	Estimated cost	Funding sources	Delivery body	Phasing/ delivery period	Notes
Active Travel Routes	TBC	Developer	Developer	Prior to first occupation	Details to be determined through Transport Assessment and Masterplanning. Internal layout and active travel routes within the site will be determined at the planning application stage in collaboration with active travel colleagues.
Highways and Sustainable Travel to include: • Off-site highway infrastructure contributions as necessary including, local and strategic highway network improvements.	TBC	Developer	Developer	TBC	Details to be determined through Transport Assessment and Masterplanning.
Public transport financial contributions.	Circa £40,000	Developer	Regional and local bus providers	TBC	Financial contributions towards improved public transport and bus frequency. Cost may be subject to change, to be determined at the planning application stage.

Education – Primary and Secondary Schools.	TBC	Developer	Developer	TBC	MCC Education suggests there is currently capacity in both the primary and secondary schools in the locality. This will be reviewed at the planning application stage to determine whether any costs are required.
Green Infrastructure	TBC GI to be incorporated into site as part of detailed masterplanning of the site in accordance with Policy GI1. Commuted sum TBC (see notes).	Developer	Developer / Monmouthshire County Council.	TBC	To be provided on site. GI includes informal open space, amenity green space, parks and gardens, natural and semi natural space, community orchards and community growing. See policies GI1 and CI2 for further detail. The Councils preference is for GI is to be adopted by MCC a commuted sum will therefore apply – details to be determined at the planning application stage. PPW12 Chapter 6 indicates mitigation ratios for individual tree, hedgerow and woodland loss. Net biodiversity benefits e.g. bird/bat boxes to be provided on every home at the current cost of £100 per home. Further details to be determined at the planning application stage.
Nature Recovery	TBC Net Benefit for biodiversity to be provided on site	Developer	Monmouthshire County Council	TBC	To be provided on site, as far as is possible. Net Benefit for biodiversity relating to any loss or degradation and required compensation or net

	as part of detailed master planning in accordance with policy NR1 Commuted sum TBC, if necessary				benefit and associated monitoring, management and maintenance in accordance with policy NR1. This is additional to the requirements outlined under GI as it relates directly to existing ecological interests impacted by development.
Severn Estuary European Marine Site – financial contribution	TBC	Developer	Monmouthshire County Council	TBC	Site is located in the 12.6km core recreational catchment zone for the Severn Estuary European Marine Site, a financial contribution may be required as part of the mitigation strategy for the protected site to reduce recreational pressure on the features of the Estuary.
Public Right of Way enhancements and connections	TBC	Developer	Developer	TBC	Details to be determined through Transport Assessment and Masterplanning.
Recreation and Open Space	TBC Open space to be provided on site. Off-site contribution towards existing play area at King George V playing	Developer	Developer / Monmouthshire County Council	TBC	Exact level and type of provision will be determined as part of Masterplanning and will account for existing local provision, including any deficiencies. Recreation and Open Space includes childrens play areas, formal pitches and other outdoor sports, see Policy CI2 for further detail. Off-site contributions only required if sufficient public open space, play areas and adult recreation provision is not included within the site.

	field (Based on current indicative cost circa £16,000). Further off-site contributions may be required in accordance with the standards set out in Policy CI2. Commuted sum TBC (see notes).				The Councils preference is for Recreation and Open Space to be adopted by MCC and therefore a commuted sum will be required. This is to be calculated at the time of the planning application based on the layout and amount of open space.
Drainage	TBC	Developer	Developer	TBC	Details to be determined at the planning application stage
Water Supply/Sewerage	N/A	N/A	N/A	N/A	DCWW note there are no issues with water supply network or foul flows being accommodated for this site at the Nash WwTW.

Key supporting information to include:

- Masterplan.
- Viability Assessment.
- Agricultural Land Classification Report.
- Ecological Assessments.
- Green Infrastructure and Landscape Assessments.

- Green Infrastructure Statement.
- Archaeology and Heritage Assessments.
- Flooding and Drainage Assessments.
- Highway and Transport Assessments.
- Environmental Health Assessments.
- National Grid feasibility study.

Further reports/surveys as necessary to accompany planning application

Land at Churchfields, Devauden

Policy HA14: Land at Churchfields, Devauden			
Site Area	**Allocation Type**	**Total Homes**	**Phasing Tranche**
Circa 1ha	Residential	Total Homes: 20 Open Market Homes: 10 Affordable Homes: 10	Years 11 to 15
Site Description			
Land at Churchfields is located on the western edge of Devauden adjacent to existing residential development. Agricultural land is located to the north, west and south of the site. The site is located within the National Landscape Wye Valley (AONB).			
Key site issues and constraints		**Key policy requirements**	
• Located within the Wye Valley National Landscape (AONB). • The site is also within the River Usk phosphorus sensitive catchment area.		• 50% affordable homes on site. • Net zero carbon homes. • Sustainable transport/Active travel as appropriate. • Green infrastructure.	

Key Infrastructure requirements (including broad costs where known):					
Infrastructure requirements	**Estimated cost**	**Funding sources**	**Delivery body**	**Phasing/ delivery period**	**Notes**
Active Travel Routes	TBC	Developer	Developer	Prior to first occupation	Details to be determined through Transport Assessment and Masterplanning. Internal layout and active travel routes within the site will be determined at the planning application stage in collaboration with active travel colleagues.
Highways and Sustainable Travel to include: • Off-site highway infrastructure contributions as necessary including, local and strategic highway network improvements	TBC	Developer	Developer	TBC	Details to be determined through Transport Assessment and Masterplanning.
Public transport financial contributions.	Circa £50,000	Developer	Regional and local bus providers	TBC	Financial contributions towards improved public transport and bus frequency. Cost may be subject to change, to be determined at the planning application stage.
Education – Primary and Secondary Schools.	TBC	Developer	Developer	TBC	MCC Education suggests there is currently capacity in both the primary and secondary schools in the locality. This will be reviewed at the planning application stage to determine whether any costs are required.

Green Infrastructure	TBC GI to be incorporated into site as part of detailed masterplanning of the site in accordance with Policy GI1. Commuted sum TBC (see notes).	Developer	Developer / Monmouthshire County Council.	TBC	To be provided on site. GI includes informal open space, amenity green space, parks and gardens, natural and semi natural space, community orchards and community growing. See policies GI1 and CI2 for further detail. The Councils preference is for GI is to be adopted by MCC a commuted sum will therefore apply – details to be determined at the planning application stage. PPW12 Chapter 6 indicates mitigation ratios for individual tree, hedgerow and woodland loss. Net biodiversity benefits e.g. bird/bat boxes to be provided on every home at the current cost of £100 per home. Further details to be determined at the planning application stage.
Nature Recovery	TBC Net Benefit for biodiversity to be provided on site as part of detailed master planning in accordance with policy NR1	Developer	Monmouthshire County Council	TBC	To be provided on site, as far as is possible. Net Benefit for biodiversity relating to any loss or degradation and required compensation or net benefit and associated monitoring, management and maintenance in accordance with policy NR1. This is additional to the requirements outlined under GI as it relates directly to existing ecological interests impacted by development.

	Commuted sum TBC, if necessary				
Public Right of Way enhancements and connections	TBC	Developer	Developer	TBC	Details to be determined through Transport Assessment and Masterplanning.
Recreation and Open Space	Open space to be provided on site. Off-site contribution towards improvement of existing play area adjacent to Hood Memorial Hall (Based on current indicative cost circa £20,000). Further off-site contributions may be required in accordance with the standards set out in Policy CI2. Commuted sum TBC (see notes).	Developer	Developer / Monmouthshire County Council	TBC	Exact level and type of provision will be determined as part of Masterplanning and will account for existing local provision, including any deficiencies. Recreation and Open Space includes childrens play areas, formal pitches and other outdoor sports, see Policy CI2 for further detail. Off-site contributions only required if sufficient public open space, play areas and adult recreation provision is not included within the site. The Councils preference is for Recreation and Open Space to be adopted by MCC and therefore a commuted sum will be required. This is to be calculated at the time of the planning application based on the layout and amount of open space.

Drainage	TBC	Developer	Developer	TBC	Details to be determined at the planning application stage
Water Supply/Sewerage	TBC	DCWW	DCWW	TBC	DCWW note there are no issues with water supply network or foul flows being accommodated for this site at the Devauden WwTW. From a phosphorus perspective a scheme to ensure the proposal can be accommodated within the existing capacity of the permit must be undertaken. Development cannot be consented until a detailed scheme showing compliance with the environmental permit has been agreed with NRW and DCWW.

Key supporting information to include:

- Masterplan.
- Viability Assessment.
- Agricultural Land Classification Report.
- Ecological Assessments.
- Green Infrastructure and Landscape Assessments.
- Green Infrastructure Statement.
- Archaeology and Heritage Assessments.
- Flooding and Drainage Assessments.
- Highway and Transport Assessments.
- Environmental Health Assessments.
- National Grid feasibility study.

Further reports/surveys as necessary to accompany planning application

Land east of Little Mill

Policy HA15: Land east of Little Mill			
Site Area	**Allocation Type**	**Total Homes**	**Phasing Tranche**
Circa 1.68ha	Residential	Total Homes: 20 Open Market Homes: 10 Affordable Homes: 10	Years 6 to 10

Site Description

Land east of Little Mill is located to the north of the A472 on the eastern side of the village. The site has residential development to the west, separated by a development access road and agricultural land to the north and east.

Key site issues and constraints	Key policy requirements
• The site is within the Usk Glacier Terminal Moraine Regionally Important Geodiversity Site (RIGS) • A 225mm foul sewer crosses the site. • Site is located within the River Usk phosphorus catchment area. • The site is adjacent to a former sawmill, that may have resulted in contamination of the land.	• 50% affordable homes on site. • Net zero carbon homes. • Sustainable transport/Active travel as appropriate. • Green infrastructure.

Key Infrastructure requirements (including broad costs where known):

Infrastructure requirements	Estimated cost	Funding sources	Delivery body	Phasing/ delivery period	Notes
Active Travel Routes	TBC	Developer	Developer	Prior to first occupation	Details to be determined through Transport Assessment and Masterplanning. Internal layout and

					active travel routes within the site will be determined at the planning application stage in collaboration with active travel colleagues.
Highways and Sustainable Travel to include: • Off-site highway infrastructure contributions as necessary including, local and strategic highway network improvements.	TBC	Developer	Developer	TBC	Details to be determined through Transport Assessment and Masterplanning.
Public transport financial contributions.	Circa £50,000	Developer	Regional and local bus providers	TBC	Financial contributions towards improved public transport and bus frequency. Cost may be subject to change, to be determined at the planning application stage.
Education – Primary and Secondary Schools.	TBC	Developer	Developer	TBC	MCC Education suggests there is currently capacity in both the primary and secondary schools in the locality. This will be reviewed at the planning application stage to determine whether any costs are required.
Green Infrastructure	TBC GI to be incorporated into site as part of detailed	Developer	Developer / Monmouthshire County Council.	TBC	To be provided on site. GI includes informal open space, amenity green space, parks and gardens, natural and semi natural space, community orchards and community growing. See policies GI1 and CI2 for further detail.

	masterplanning of the site in accordance with Policy GI1. Commuted sum TBC (see notes).				The Councils preference is for GI is to be adopted by MCC a commuted sum will therefore apply – details to be determined at the planning application stage. PPW12 Chapter 6 indicates mitigation ratios for individual tree, hedgerow and woodland loss. Net biodiversity benefits e.g. bird/bat boxes to be provided on every home at the current cost of £100 per home. Further details to be determined at the planning application stage.
Nature Recovery	TBC Net Benefit for biodiversity to be provided on site as part of detailed master planning in accordance with policy NR1 Commuted sum TBC, if necessary	Developer	Monmouthshire County Council	TBC	To be provided on site, as far as is possible. Net Benefit for biodiversity relating to any loss or degradation and required compensation or net benefit and associated monitoring, management and maintenance in accordance with policy NR1. This is additional to the requirements outlined under GI as it relates directly to existing ecological interests impacted by development.
Public Right of Way enhancements and connections	TBC	Developer	Developer	TBC	Details to be determined through Transport Assessment and Masterplanning.

Recreation and Open Space	Open space to be provided on site. Off-site contributions towards existing play provision in the village (Based on current indicative cost circa £20,000). Further off-site contributions may be required in accordance with the standards set out in Policy CI2. Commuted sum TBC (see notes).	Developer	Developer / Monmouthshire County Council	TBC	Exact level and type of provision will be determined as part of Masterplanning and will account for existing local provision, including any deficiencies. Recreation and Open Space includes childrens play areas, formal pitches and other outdoor sports, see Policy CI2 for further detail. Off-site contributions only required if sufficient public open space, play areas and adult recreation provision is not included within the site. The Councils preference is for Recreation and Open Space to be adopted by MCC and therefore a commuted sum will be required. This is to be calculated at the time of the planning application based on the layout and amount of open space.
Drainage	TBC	Developer	Developer	TBC	Details to be determined at the planning application stage following details relating to a scheme for the management of overland flows from adjacent land.
Water Supply/Sewerage	TBC	Developer	Developer	TBC	DCWW note there are no issues with water supply network being accommodated for this site at the Little Mill WwTW.

					The Little Mill WwTW however currently has limited capacity to accommodate foul flows, a Developer Impact Assessment may need to be undertaken on the WwTW which will conclude any reinforcement works required. From a phosphorus perspective, NRW have completed the Environmental Permit review process and this proposal would be accommodated within the existing capacity of the permit.

Key supporting information to include:

- Masterplan.
- Viability Assessment.
- Agricultural Land Classification Report.
- Ecological Assessments.
- Green Infrastructure and Landscape Assessments.
- Green Infrastructure Statement.
- Flooding and Drainage Assessments.
- Relevant Heritage Assessments.
- Highways and Transport Assessments.
- Environmental Health Assessments including Air Quality and Noise

Further reports/surveys as necessary to accompany planning application.

Land north of Little Mill

Policy			
Site Area	**Allocation Type**	**Total Homes**	**Phasing Tranche**
Circa 0.87ha	Residential	Total Homes: 15 Open Market Homes: 7 Affordable Homes: 8	Years 6 to 10

Site Description

The site is situated at the northern edge of Little Mill. Residential development borders the southern edge of the site, with a railway line to the north-west and grazing land to the north and east. This allocation is a continuation of an Adopted LDP allocation for 60% affordable homes.

Key site issues and constraints	Key policy requirements
• The site is within the Usk Glaciar Terminal Moraine Regionally Important Geodiversity Site (RIGS). • Public footpath along the site's eastern boundary. • Noise and vibration mitigation measures required due to the site's proximity to the adjacent railway line. • Site is located within the River Usk phosphorus catchment area.	• Site has planning permission for 15 homes, 60% of which are affordable homes in accordance with the LDP allocation.

Key Infrastructure requirements (including broad costs where known):					
Infrastructure requirements	**Estimated cost**	**Funding sources**	**Delivery body**	**Phasing/ delivery period**	**Notes**
Education – Primary and Secondary Schools.	TBC	Developer	Developer	N/A	Education suggests there is currently capacity in both primary and secondary schools within the area. No costs required.
Green Infrastructure	To be incorporated into site.	Developer	Developer / Monmouthshire County Council.	TBC	To be provided on site.
Water Supply/Sewerage	N/A	N/A	N/A	N/A	DCWW note there are no issues with foul flows or the water supply network being accommodated for this site at the Little Mill WwTW. From a phosphorus perspective, NRW have completed the Environmental Permit review process and this proposal would be accommodated within the existing capacity of the permit.

Key supporting information submitted as part of planning application:

- Geotechnical and Geo-environmental Report
- Tree Constraints Plan
- Arboricultural Method Statement
- LVIA
- Landscaping Plan
- Landscape Specification and Management Plan

- Green Infrastructure Assets and Opportunities Plans
- GI Management Plan
- Transport Statement
- Flood Assessment and Drainage Strategy
- Ecological Assessments
- Acoustic Report
- Thermal Comfort Analysis

Land adjacent to Llanellen Court Farm, Llanellen

Policy HA17: Land adjacent to Llanellen Court Farm, Llanellen			
Site Area	**Allocation Type**	**Total Homes**	**Phasing Tranche**
Circa 1.56ha	Residential	Total Homes: 26 Open Market Homes: 13 Affordable Homes: 13	Years 11 to 15

Site Description

The site is located adjacent Llanellen Court Farm, to the north-west of the A4042. Existing residential development is located to the north of the site with agricultural land to the west and east.

Key site issues and constraints	Key policy requirements
• Protect, buffer and maintain existing TPO trees and other trees and hedgerows. The creation of accessible pedestrian access to the bus stop on Elm Drive, a shared-use path to link to the Monmouthshire and Brecon Canal and exploration of better links to the village centre. • Site is located within the River Usk phosphorus catchment area.	• 50% affordable homes on site. • Net zero carbon homes. • Sustainable transport/Active travel as appropriate. • Green infrastructure.

Key Infrastructure requirements (including broad costs where known):					
Infrastructure requirements	**Estimated cost**	**Funding sources**	**Delivery body**	**Phasing/ delivery period**	**Notes**
Active Travel Routes	TBC	Developer	Developer	Prior to first occupation	Details to be determined through Transport Assessment and Masterplanning. Internal layout and active travel routes within the site will be determined at the planning application stage in collaboration with active travel colleagues.
Highways and Sustainable Travel to include: • Off-site highway infrastructure contributions as necessary including, local and strategic highway network improvements	TBC	Developer	Developer	TBC	Details to be determined through Transport Assessment and Masterplanning.
Public transport financial contributions.	Circa £65,000	Developer	Regional and local bus providers	TBC	Financial contributions towards improved public transport and bus frequency. Cost may be subject to change, to be determined at the planning application stage.
Education – Primary and Secondary Schools.	TBC	Developer	Developer	TBC	Education suggests there is no capacity in catchment primary school so would need to attend alternative schools in the cluster but quantum of children not sufficient to increase capacity and therefore no

					contribution currently required. MCC Education suggests there is currently capacity in secondary schools in the locality. This will be reviewed at the planning application stage to determine whether any costs are required.
Green Infrastructure	TBC GI to be incorporated into site as part of detailed masterplanning of the site in accordance with Policy GI1. Commuted sum TBC (see notes).	Developer	Developer / Monmouthshire County Council.	TBC	To be provided on site. GI includes informal open space, amenity green space, parks and gardens, natural and semi natural space, community orchards and community growing. See policies GI1 and CI2 for further detail. The Councils preference is for GI is to be adopted by MCC a commuted sum will therefore apply – details to be determined at the planning application stage. PPW12 Chapter 6 indicates mitigation ratios for individual tree, hedgerow and woodland loss. Net biodiversity benefits e.g. bird/bat boxes to be provided on every home at the current cost of £100 per home. Further details to be determined at the planning application stage.
Nature Recovery	TBC Net Benefit for biodiversity to be provided on site as part of	Developer	Monmouthshire County Council	TBC	To be provided on site, as far as is possible. Net Benefit for biodiversity relating to any loss or degradation and required compensation or net benefit and associated monitoring, management and maintenance in accordance with policy NR1.

	detailed master planning in accordance with policy NR1 Commuted sum TBC, if necessary				This is additional to the requirements outlined under GI as it relates directly to existing ecological interests impacted by development.
Public Right of Way enhancements and connections	TBC	Developer	Developer	TBC	Details to be determined through Transport Assessment and Masterplanning.
Recreation and Open Space	Open space to be provided on site. Off-site contribution towards existing play area at Owain Glyndwr playing field (Based on current indicative cost circa £26,000). Further off-site contributions may be required	Developer	Developer / Monmouthshire County Council	TBC	Exact level and type of provision will be determined as part of Masterplanning and will account for existing local provision, including any deficiencies. Recreation and Open Space includes childrens play areas, formal pitches and other outdoor sports, see Policy CI2 for further detail. Off-site contributions only required if sufficient public open space, play areas and adult recreation provision is not included within the site. The Councils preference is for Recreation and Open Space to be adopted by MCC and therefore a commuted sum will be required. This is to be calculated at the time of the planning application based on the layout and amount of open space.

	in accordance with the standards set out in Policy CI2. Commuted sum TBC (see notes).				
Drainage	TBC	Developer	Developer	TBC	Details to be determined at the planning application stage.
Water Supply/Sewerage	N/A	N/A	N/A	N/A	DCWW note there are no issues with water supply network or foul flows being accommodated for this site at the Llanellen WwTW. From a phosphorus perspective, NRW have completed the Environmental Permit review process and this proposal would be accommodated within the existing capacity of the permit.

Key supporting information to include:

- Masterplan.
- Viability Assessment.
- Ecological Assessments.
- Green Infrastructure and Landscape Assessments.
- Green Infrastructure Statement.
- Agricultural Land Classification Report.
- Archaeological Desk-Based Assessment.
- Drainage Strategy Report.

- Highways and Transport Assessments.
- Tree Survey and Protection Plan.
- Noise Assessment (TAN11 - BS4142 type assessment).
- Land Contamination Strategy.
- National Grid Feasibility Study.

Further reports/surveys as necessary to accompany planning application.

Land west of Redd Landes, Shirenewton

Policy HA18 Land west of Redd Landes, Shirenewton:			
Site Area	**Allocation Type**	**Total Homes**	**Phasing Tranche**
Circa 1.76ha	Residential	Total Homes: 26 Open Market Homes: 13 Affordable Homes: 13	Years 6 to 10

Site Description

Land west of Redd Landes is located on the western edge of Shirenewton with existing residential properties to the east and agricultural land to the north and west. The site is located opposite a recreation ground, play area and recreation hall.

Key site issues and constraints	Key policy requirements
• Additional hedgerow and tree planting required to boundaries to respond to its edge of settlement location. • Connections to the road frontage on the eastern part of the site to provide ease of access to the recreation hall and grounds. • Site is located within the 12.6km Core Recreational Catchment Zone for the Severn Estuary European Marine Site, financial	• 50% affordable homes on site. • Net zero carbon homes. • Sustainable transport/Active travel as appropriate. • Green infrastructure.

contributions may therefore be required as part of a mitigation strategy.	

Key Infrastructure requirements (including broad costs where known):

Infrastructure requirements	Estimated cost	Funding sources	Delivery body	Phasing/ delivery period	Notes
Active Travel Routes	TBC	Developer	Developer	Prior to first occupation	Details to be determined through Transport Assessment and Masterplanning. Internal layout and active travel routes within the site will be determined at the planning application stage in collaboration with active travel colleagues.
Highways and Sustainable Travel to include: • Off-site highway infrastructure contributions as necessary including, local and strategic highway network improvements.	TBC	Developer	Developer	TBC	Details to be determined through Transport Assessment and Masterplanning.
Public transport financial contributions.	Circa £65,000	Developer	Regional and local bus providers	TBC	Financial contributions towards improved public transport and bus frequency. Cost may be subject to change, to be determined at the planning application stage.

Education – Primary and Secondary Schools.	TBC	Developer	Developer	TBC	Education suggests there are capacity issues in some year groups in the catchment primary school so may need to attend alternative schools in the cluster but quantum of children not sufficient to increase capacity and therefore no contribution currently required. MCC Education suggests there is currently capacity in secondary schools in the locality. This will be reviewed at the planning application stage to determine whether any costs are required.
Green Infrastructure	TBC GI to be incorporated into site as part of detailed masterplanning of the site in accordance with Policy GI1. Commuted sum TBC (see notes).	Developer	Developer / Monmouthshire County Council.	TBC	To be provided on site. GI includes informal open space, amenity green space, parks and gardens, natural and semi natural space, community orchards and community growing. See policies GI1 and CI2 for further detail. The Councils preference is for GI is to be adopted by MCC a commuted sum will therefore apply – details to be determined at the planning application stage. Net biodiversity benefits e.g. bird/bat boxes to be provided on every home at the current cost of £100 per home. Further details to be determined at the planning application stage.
Nature Recovery	TBC Net Benefit for biodiversity to	Developer	Monmouthshire County Council	TBC	To be provided on site, as far as is possible. Net Benefit for biodiversity relating to any loss or degradation and required compensation or net benefit and associated

	be provided on site as part of detailed master planning in accordance with policy NR1 Commuted sum TBC, if necessary				monitoring, management and maintenance in accordance with policy NR1. This is additional to the requirements outlined under GI as it relates directly to existing ecological interests impacted by development.
Public Right of Way enhancements and connections	TBC	Developer	Developer	TBC	Details to be determined through Transport Assessment and Masterplanning.
Severn Estuary European Marine Site – financial contribution	TBC	Developer	Monmouthshire County Council	TBC	Site is located in the 12.6km core recreational catchment zone for the Severn Estuary European Marine Site, a financial contribution may be required as part of the mitigation strategy for the protected site to reduce recreational pressure on the features of the Estuary.
Recreation and Open Space	Open space to be provided on site. Off-site contribution towards	Developer	Developer / Monmouthshire County Council	TBC	Exact level and type of provision will be determined as part of Masterplanning and will account for existing local provision, including any deficiencies. Recreation and Open Space includes childrens play areas, formal pitches and other outdoor sports, see Policy CI2 for further detail.

	improvements at existing play area at Shirenewton Playing Field (Based on current indicative cost circa £26,000). Further off-site contributions may be required in accordance with the standards set out in Policy CI2. Commuted sum TBC (see notes).				Off-site contributions only required if sufficient public open space, play areas and adult recreation provision is not included within the site. The Councils preference is for Recreation and Open Space to be adopted by MCC and therefore a commuted sum will be required. This is to be calculated at the time of the planning application based on the layout and amount of open space.
Drainage	TBC	Developer	Developer	TBC	Details to be determined at the planning application stage.

Water Supply/Sewerage	N/A	N/A	N/A	N/A	DCWW note there are no issues with water supply network or foul flows being accommodated for this site at the Newport Nash WwTW.
Water mains – traversing the site	TBC	Developer	Developer	TBC	A diversion or easement may be required to protect any water mains traversing the site. Details to be determined at the planning application stage once further investigation has taken place.

Key supporting information to include:

- Masterplan.
- Viability Assessment.
- Ecological Assessments.
- Green Infrastructure and Landscape Assessments.
- Green Infrastructure Statement.
- Flooding Assessment & Drainage Report.
- Highways and Transport Assessments.
- National Grid feasibility study.

Further reports/surveys as necessary to accompany planning application.

Appendix 9: Housing Trajectory

Table 1: The Timing and Phasing of Allocations (2018-2033)

Settlement Tier	CS Ref	RLDP Policy Ref	Site Name	Total Site Capacity	Planning Application Details where applicable	Time lag to construction start in			Phasing of Development (2018-33) (Base Date 1st April 2024)																		
											Actual Completions							Estimated Completions									
						Time period for pre-application discussions/ PAC consultation	Time between submission of planning application and determination	Time taken from planning consent to the discharge of relevant conditions to enable site construction	Completions To Date	U/C (units also incl. in phasing)	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033 +9mth	Units phased beyond the plan period
											1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	15+9 mths	
Abergavenny (Tier 1)(Primary)	CS0213 & part CS0293	HA1	Land to the East of Abergavenny	500		6 months	12 months	6 months	0	0	0	0	0	0	0	0	0	0	0	0	70	90	90	90	90	70	0
Abergavenny (Tier 1)(Primary)	CS0094	HA5	Land at Penlanlas Farm	100		4 months	6 months	6 months	0	0	0	0	0	0	0	0	0	0	0	50	50	0	0	0	0	0	0
Chepstow (Tier	CS0165	HA3	Land at Mounton Road	146		4 months	9 months	6 months	0	0	0	0	0	0	0	0	0	0	0	50	50	46	0	0	0	0	0
Monmouth (Tier 1)(Primary)	CS0076	HA6	Land at Rockfield Road	60		4 months	6 months	6 months	0	0	0	0	0	0	0	0	0	0	0	0	40	20	0	0	0	0	0
Monmouth (Tier 1)(Primary)	CS0270	HA4	Land at Leasbrook	270		6 months	12 months	6 months	0	0	0	0	0	0	0	0	0	0	0	25	50	50	50	50	45	0	0
Monmouth (Tier 1)(Primary)	CS0277	HA7	Land at Drewen Farm*	110	PAC ended 6th September.	4 months	6 months	6 months	0	0	0	0	0	0	0	0	0	0	10	50	50	0	0	0	0	0	0
Monmouth (Tier 1)(Primary)	CS0189	HA8	Tudor Road, Wyesham*	50	DM/2024/00557 - 50 affordable dwellings under consideration.	4 months	6 months	6 months	0	0	0	0	0	0	0	0	0	25	25	0	0	0	0	0	0	0	0
Severnside (Tier 1)(Primary)	CS0087 &CS025	HA2	Caldicot East	770		6 months	12 months	6 months	0	0	0	0	0	0	0	0	0	0	0	75	125	125	125	125	125	70	0
Severnside (Tier 1)(Primary)	CS0009	HA9	Land at Former MoD, Caerwent	40		4 months	9 months	8 months	0	0	0	0	0	0	0	0	0	0	0	40	0	0	0	0	0	0	0
Raglan (Tier 2)(Secondary)	CS0183	HA10	South of Monmouth Rd, Raglan	54		4 months	6 months	6 months	0	0	0	0	0	0	0	0	0	0	0	40	14	0	0	0	0	0	0
Usk (Tier 2)(Secondary)	CS0113	HA11	Land East of Burrium Gate, Usk	40		4 months	6 months	6 months	0	0	0	0	0	0	0	0	0	0	10	30	0	0	0	0	0	0	0
Penperlleni (Tier 2)(Secondary)	CS0037	HA12	Land West of Trem yr Ysgol, Penperlleni	42		2 months	6 months	6 months	0	0	0	0	0	0	0	0	0	0	0	30	12	0	0	0	0	0	0
St Arvans (Tier 3) (Main Rural)	CS0077	HA13	Land adj, Piercefield Pub, St Arvans	16		2 months	6 months	6 months	0	0	0	0	0	0	0	0	0	0	0	16	0	0	0	0	0	0	0
Devauden (Tier 3)(Main Rural)	CS0214	HA14	Land at Churchfields, Devauden	20		2 months	6 months	6 months	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	10	10	0	0
Little Mill (Tier 3)(Main Rural)	CS0016	HA15	Land East Little Mill	20		2 months	6 months	6 months	0	0	0	0	0	0	0	0	0	0	5	15	0	0	0	0	0	0	0
Little Mill (Tier 3)(Main Rural)	CS0241	HA16	Land North of Little Mill*	15	DM/2020/01438 - 15 units resolution to approve subject to signing of S106.	2 months	Granted	6 months	0	0	0	0	0	0	0	0	0	0	5	10	0	0	0	0	0	0	0
Llanellen (Tier 3)(Main Rural)	CS0027	HA17	Land adjacent Llanellen Court Farm, Llanellen	26		4 months	6 months	6 months	0	0	0	0	0	0	0	0	0	0	0	0	0	10	16	0	0	0	0
Shirenewton (Tier 3)(Main	CS0232	HA18	Land west of Redd Landes, Shirenewton	26		2 months	6 months	6 months	0	0	0	0	0	0	0	0	0	0	7	19	0	0	0	0	0	0	0
									0	0	0	0	0	0	0	0	0	30	67	440	461	341	281	275	270	140	0

Table 2: The Timing and Phasing of Sites with Planning Permission (2018-2033)

Settlement Tier	Planning Application	Site Name	Total Capacity	Phasing of Development (2018-33) (Base Date 1st April 2024)																	
				Completions To Date	U/C (units also incl. in phasing)	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033 +9mths	Units excluded from housing figures
						1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	15+9mths	
Abergavenny (Tier 1) (Primary)	DC/2014/01360	Deri Farm	250	250	0	32	68	83	51	16	0	0	0	0	0	0	0	0	0	0	0	0
Abergavenny (Tier 1) (Primary)		Goed Glas	51	51	0	0	32	19	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Abergavenny (Tier 1) (Primary)	DC/2014/01015	Mulberry House	27	0	0	0	0	0	0	0	7	0	0	0	0	0	0	0	0	0	0	20
Abergavenny (Tier 1) (Primary)		The Hill	44	44	0	20	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Abergavenny (Tier 1) (Primary)		Magistrates Court	47	47	0	0	0	47	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Abergavenny (Tier 1) (Primary)		Brecon Road	24	24	0	0	0	24	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Llanfoist (Tier 1) (Primary)	DM/2019/00346	Grove Farm	106	77	0	0	0	0	6	31	40	29	0	0	0	0	0	0	0	0	0	0
Chepstow (Tier 1) (Primary)	DM/2019/00001	Fairfield Mabey	373	317	51	0	0	18	88	97	114	56	0	0	0	0	0	0	0	0	0	0
Chepstow (Tier 1) (Primary)	DC/2009/00910	Osborn International	161	44	25	35	0	0	4	0	0	25	0	0	0	0	0	0	0	0	0	92
Monmouth (Tier 1) (Primary)	DM/2019/02054	Hillcrest Road, Wyesham	11	0	0	0	0	0	0	0	11	0	0	0	0	0	0	0	0	0	0	0
Monmouth (Tier 1) (Primary)		Wonastow Road (TW)	166	166	0	81	30	4	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Monmouth (Tier 1) (Primary)		Wonastow Road (Barratt/DW)	174	174	0	64	44	9	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Monmouth (Tier 1) (Primary)	DC/2017/00539	West of Rockfield Road	70	0	0	0	0	0	0	0	0	0	0	35	35	0	0	0	0	0	0	0
Severnside (Tier 1) (Primary)		Brookside, Caldicot	25	25	0	25	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Severnside (Tier 1) (Primary)		Former White Hart Inn, Caldicot	16	16	0	0	0	16	0	0	0	0	0	0	0	0	0	0	0	0	0
Severnside (Tier 1) (Primary)		Church Road, Caldicot	130	115	15	0	0	0	44	40	31	15	0	0	0	0	0	0	0	0	0
Severnside (Tier 1) (Primary)		Ifton Manor, Rogiet	14	14	0	0	0	12	2	0	0	0	0	0	0	0	0	0	0	0	0
Severnside (Tier 1) (Primary)		Old Shipyard, Sudbrook	46	46	0	0	0	22	24	0	0	0	0	0	0	0	0	0	0	0	0
Severnside (Tier 1) (Primary)		Sudbrook Paper Mill	210	210	0	33	61	28	41	45	0	0	0	0	0	0	0	0	0	0	0
Severnside (Tier 1) (Primary)	DM/2018/01606	Rockfield Farm (Phase 1), Undy	144	144	0	0	16	41	49	38	0	0	0	0	0	0	0	0	0	0	0
Severnside (Tier 10) (Primary)	DM/2021/00357	Rockfield Farm (Remainder), Undy	120	0	0	0	0	0	0	0	0	20	35	35	30	0	0	0	0	0	0
Severnside (Tier 1) (Primary)	DM/2019/01041	Crick Road, Portskewett	269	14	35	0	0	0	0	0	14	50	50	50	50	50	5	0	0	0	0
Severnside (Tier 1) (Primary)	DM/2022/01042	Land at Vinegar Hill, Undy	142	23	49	0	0	0	0	0	23	40	40	39	0	0	0	0	0	0	0
Severnside (Tier 1) (Primary)	DM/2023/01030	Land to North Caldicot School	46	0	0	0	0	0	0	0	0	0	46	0	0	0	0	0	0	0	0
Penperlleni (Tier 2) (Secondary)		South of Usk Road	25	25	0	25	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Penperlleni (Tier 2) (Secondary)		South of Usk Road	40	40	0	39	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Raglan (Tier 2) (Secondary)	DM/2021/02070	Land at Chepstow Rd, Raglan	38	0	0	0	0	0	0	0	0	10	28	0	0	0	0	0	0	0	0
Usk (Tier 2) (Secondary)		Cwrt Burrium, Usk	7	7	0	0	0	0	7	0	0	0	0	0	0	0	0	0	0	0	0
Shirenewton (Tier 3) (Main Rural)		(North of Minor Rd) Shirenewton	5	5	0	5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Shirenewton (Tier 3) (Main Rural)	DM/2018/02066	(South of Minor Rd) Shirenewton	11	0	0	0	0	0	0	0	0	0	11	0	0	0	0	0	0	0	0
Cross Ash (Tier 4) (Minor Rural)	DC/2017/01335	Land adj Cross Ash Garage	6	0	6	0	0	0	0	0	0	6	0	0	0	0	0	0	0	0	0
Devauden (Tier 3)(Main Rural)	DM/2018/01741	Land at Well Lane, Devauden	15	15	0	0	0	0	0	15	0	0	0	0	0	0	0	0	0	0	0
Dingestow (Tier 3) (Main Rural)		Land south east Dingestow	15	15	0	0	0	15	0	0	0	0	0	0	0	0	0	0	0	0	0
Llanishen (Tier 4) (Minor Rural)	DM/2019/02053	R/O Carpenters Arms, Llanishen	8	0	8	0	0	0	0	0	0	8	0	0	0	0	0	0	0	0	0
				Small Site Completions		84	104	81	45	61	58										
Grey cells represent completed sites/years				Total Completions		**443**	**356**	**419**	**361**	**343**	**298**	259	210	159	115	50	5	0	0	0	0	112

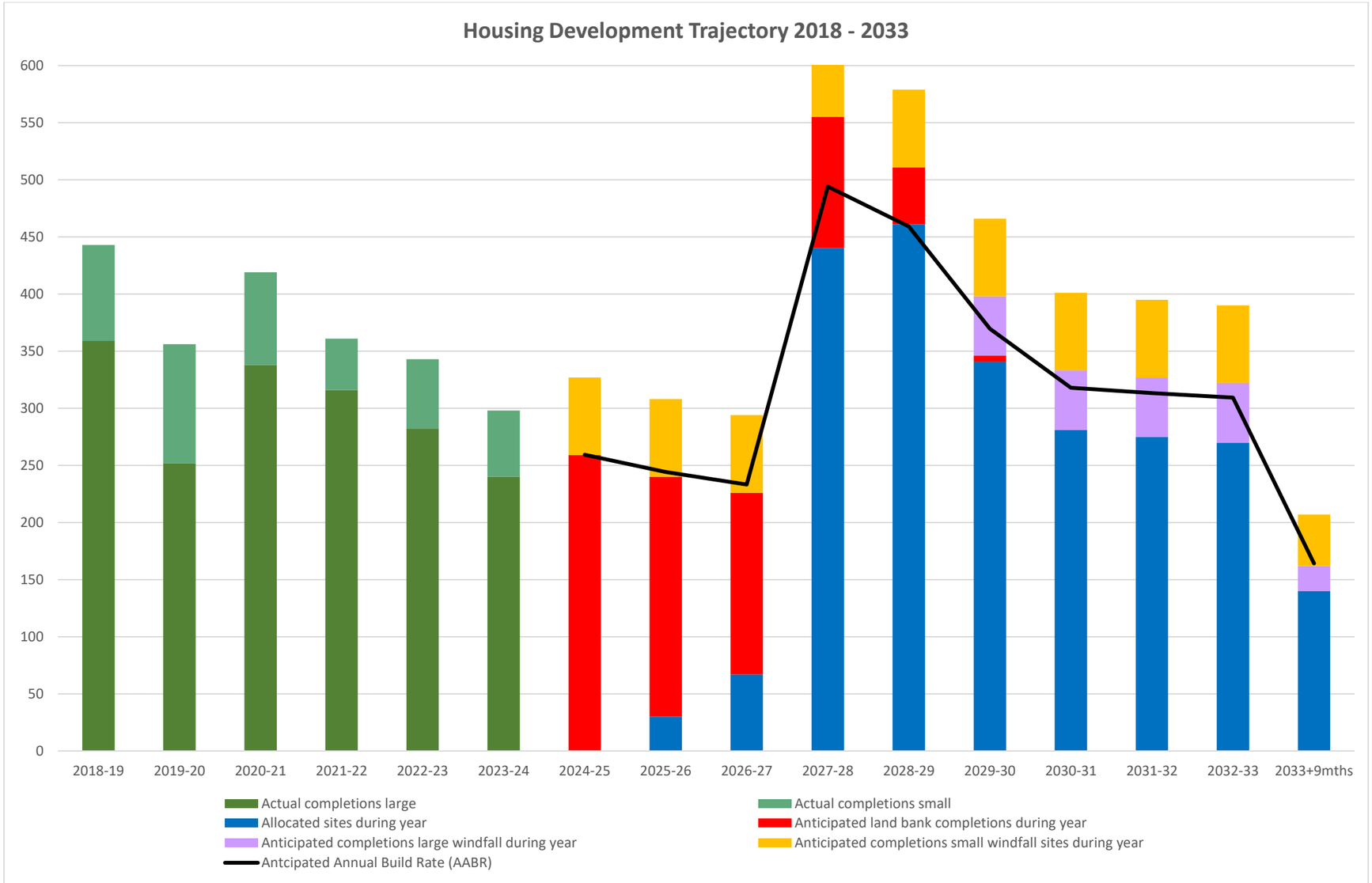
Table 3: Anticipated Annual Build Rate Calculation

LDP Year	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	15+9mths
Year	**2018-19**	**2019-20**	**2020-21**	**2021-22**	**2022-23**	**2023-24**	**2024-25**	**2025-26**	**2026-27**	**2027-28**	**2028-29**	**2029-30**	**2030-31**	**2031-32**	**2032-33**	**2033+9mths**
Remaining Years	15	14	13	12	11	10	9	8	7	6	5	4	3	2	1	0
Total Housing Provision	6210	6210	6210	6210	6210	6210	6210	6210	6210	6210	6210	6210	6210	6210	6210	6210
Total RLDP Housing Requirement	5400	5400	5400	5400	5400	5400	5400	5400	5400	5400	5400	5400	5400	5400	5400	5400
Actual recorded completions on large sites during year	359	252	338	316	282	240	0	0	0	0	0	0	0	0	0	0
Actual recorded completions on small sites during year	84	104	81	45	61	58	0	0	0	0	0	0	0	0	0	0
Anticipated completions on **allocated** sites during year	0	0	0	0	0	0	0	30	67	440	461	341	281	275	270	140
Anticipated **land bank** completions during year	0	0	0	0	0	0	259	210	159	115	50	5	0	0	0	0
Anticipated completions large **windfall** during year*	0	0	0	0	0	0	0	0	0	0	0	52	52	52	52	22
Anticipated completions **small windfall** sites during year	0	0	0	0	0	0	68	68	68	68	68	68	68	68	68	45
Total completions (E+F+G+H+I+J)	**443**	**356**	**419**	**361**	**343**	**298**	**327**	**308**	**294**	**623**	**579**	**466**	**401**	**395**	**390**	**207**
Anticipated Annual Build Rate - total anticpated annual completions (G+H+I+J) adjusted with X% adjustment factor to future completions. The adjustment factor is not applied to any actual completions recorded in rows E &F.							259	244	233	494	459	370	318	313	309	164
Total projected cumulative completions	443	799	1218	1579	1922	2220	2547	2855	3149	3772	4351	4817	5218	5613	6003	6210
Remaining housing completions (housing requirement minus projected completions by year)	4957	4601	4182	3821	3478	3180	2921	2676	2443	1949	1490	1121	803	489	180	16

*No double counting of large windfalls as the next five years of completions are already assumed to be in the land bank

**As per page 126 of the DPM there is a small margin of error due to rounding up/down issues once the adjustment factor is applied.

Figure 1: Housing Development Trajectory 2018 - 2033



Appendix 10: Employment Land Schedule

Employment Site		Available Land (ha)	Phasing		
			Short 18/19 – 22/23	Medium 23/24 – 27/28	Long 28/29 – 32/33
Industrial and Business Sites					
EA1a	Land at Nantgavenny Business Park, Abergavenny	0.59		0.59	
EA1b	Poultry Units, Rockfield Road, Monmouth	1.3		1.3	
EA1c	Land north of Wonastow Road, Monmouth	4.5			4.5
EA1d	Newhouse Farm (South of M48), Chepstow	2.5		2.5	
EA1e	Land adjoining Oak Grove Farm, Caldicot	6		6	
EA1f	Quay Point, Magor	14			13.76
EA1g	Rockfield Farm, Undy	3.2		3.2	
EA1h	Gwent Euro Park, Magor	7		7	
EA1i	Raglan Enterprise Park, Raglan	1.5		1.5	
EA1j	Land West of Raglan	4.5			4.5
Identified Mixed Use Sites					
EA1k	Land to the East of Abergavenny	1			1
EA1l	Land at Former MoD Site, Caerwent	1			1
EA1m	Land to the East of Caldicot	1			1
Total			**45.85ha**		

Appendix 11: Supplementary Planning Guidance Schedule

The RLDP will be supported by Supplementary Planning Guidance (SPG) to cover a range of policy areas, including those set out below, which will be prepared following adoption of the RLDP. A number of existing SPGs which were prepared to support the adopted LDP will be updated as relevant to reflect and support the updated RLDP policy framework. This list in not exhaustive.

SPG Topic	Timescale
Planning Obligations	Within 12 months of adoption
Affordable Housing	Within 12 months of adoption
Placemaking and Design	Within 12 months of adoption
Net Zero Carbon Homes	Within 12 months of adoption
Rural Conversions to Residential and Tourism Use	Within 12 months of adoption
Replacement Dwellings in the Open Countryside and Extension of Rural Dwellings	Within 12 months of adoption
Conversion of Agricultural Buildings Design Guide	Within 12 months of adoption
Sustainable Tourism	Within 12 months of adoption
Primary Shopping Frontages	Within 12 months of adoption
Green Infrastructure	Within 12 months of adoption
Trees, Woodland and Hedgerows	Within 12 months of adoption
Nature Recovery and Geodiversity	Within 12 months of adoption
Severn Estuary European Marine Site: Recreational Disturbance	Within 12 months of adoption
Dark Skies and Lighting	Within 12 months of adoption

Appendix 12: Glossary of terms

Adopted Plan	The final version of the RLDP.
Adoption	The final stage of Local Development Plan preparation where the RLDP becomes the statutory development plan for the area it covers.
Affordable Housing	Housing where there are secure mechanisms in place to ensure that it is accessible to those who cannot afford market housing, both on first occupation and for subsequent occupiers.
Annual Monitoring Report (AMR)	A yearly report to monitor the effectiveness of the RLDP and ultimately determines whether any revisions to the Plan are necessary. It assesses the extent to which the RLDP strategy and objectives are being achieved and whether the RLDP policies are functioning effectively.
Area of Outstanding Natural Beauty (AONB)	An Area of Outstanding Natural Beauty (AONB) is designated for conservation due to its significant landscape value. In Monmouthshire the Wye Valley National Landscape is designated as an AONB.
Baseline	A description of the present state of an area.
Blue Infrastructure	Blue infrastructure is an element of GI and refers to water features, including ponds, lakes, streams, rivers and storm water provision, swales, rain gardens, wetlands and canals and their banks
Brownfield Site	See definition for Previously Developed Land.
Candidate Site	A site nominated by an individual with an interest in land (i.e. landowner, developer, agent or member of the public) to be considered for inclusion in the RLDP. All Candidate Sites will be assessed for suitability for inclusion as potential allocations.
Central Shopping and Commercial Area (CSCA)	Central Shopping and Commercial Areas (CSCA) are designated through the RLDP as retail and commercial centres. There are CSCAs in Monmouthshire in Abergavenny, Caldicot, Chepstow, Monmouth, Magor and Usk.
Community	People living in a defined geographical area, or who share other interests and therefore form communities of interest.
Conservation Area	An area designated by the LPA which is of a special architectural or historic interest that the distinctive character or appearance of which is desirable to preserve or enhance. There area 31 Conservations in Monmouthshire.
Consultation	A formal process in which comments are invited on a particular topic or draft document usually within a defined time period.

Council	Monmouthshire County Council (excluding for planning purposes the Brecon Beacons National Park administrative area that falls within Monmouthshire).
Delivery Agreement (DA)	A document comprising the local planning authority's timetable for the preparation of a Local Development Plan, together with its Community Involvement Scheme, submitted to the Welsh Government for agreement.
Deposit Plan	This is a full draft of the RLDP which undergoes a formal consultation period prior to it being submitted to the Welsh Government for public examination.
Development Plans Manual (DPM)	The Development Plans Manual, 'The Manual', is an online reference document for practitioners who are responsible for, or contribute to, the preparation and implementation of development plans. It contains practical guidance on how to prepare, monitor and revise a development plan, underpinned by robust evidence to ensure that plans are effective and deliverable and contribute to placemaking, as defined in national policy set out in Planning Policy Wales (PPW).
Engagement	A proactive process that seeks to encourage the involvement and participation of the community and other groups in the decision making process.
Evidence Base	Information and data that provides the basis for the preparation of the RLDP vision, objectives, policies and proposals and justifies the soundness of the policy approach of the RLDP.
Examination	The examination involves public examination of the Deposit RLDP, the Deposit representations, the report of consultation, evidence base/background documents and the Integrated Sustainability Appraisal Report. This is carried out by the PEDW on behalf of the Welsh Government.
Green Infrastructure (GI)	Green infrastructure (GI) is the network of natural and semi-natural features, green spaces, rivers and lakes that intersperse and connect places. GI functions at landscape, local and smaller scales and can include entire ecosystems, GI networks, local parks, natural green spaces, fields, woodland, allotments, verges and SUDs.
Habitat Regulations Assessment (HRA)	Habitats Regulations Assessment (HRA) relates to the assessment of the impacts of a Plan (or project) against the nature conservation objectives of European designated sites for any likely significant effects. HRA also ascertains whether the proposed Plan would adversely affect the integrity of the site.
Indicator	A measure of variables over time, often used to measure progress in the achievement of objectives, targets and policies.

Infrastructure Delivery Plan (IDP)	The Infrastructure Delivery Plan (IDP) identifies key infrastructure needed to support the development of sites allocated within the plan.
Inspector's Report	The Report prepared by an independent Inspector who examines the RLDP. The Inspector's Report contains recommendations on the content of the final RLDP and is binding upon the Council. The Council must adopt the RLDP in the manner directed by the Inspector.
Local Development Plan (LDP)	A land use plan which includes a vision, strategy, area wide policies for development types, land allocations, and policies and proposals for key areas of change and protection. Allocations and certain policies are shown geographically on the Proposals Map forming part of the Plan. The LDP is a statutory development plan that each local planning authority area is required to produce in Wales.
Local Nature Reserve (LNR)	Local Nature Reserves (LNR) are non-statutory local nature conservation designations and relate to areas of natural heritage of local importance.
Local Planning Authority (LPA)	In the case of Monmouthshire, this is Monmouthshire County Council (excluding the Brecon Beacons National Park administrative area where the local planning authority is the National Park).
Monmouthshire County Council (MCC)	This is the name of the Local Planning Authority preparing the RLDP.
National Nature Reserve (NNR)	National Nature Reserves (NNR) are statutory national nature conservation designations relating to wildlife, habitats and geological features of special interest.
Objective	A statement of what is intended, specifying the desired direction of change in trends.
Partners	Other local authority departments and statutory bodies where the RLDP will help to deliver some of the objectives of their strategies. Partners may be expected to contribute in the formulation of relevant parts of the Plan.
Plan Period	The period of time the plan is in effect, after which it no longer ceases to provide the planning policy framework for a given area, the Monmouthshire RLDP covers the plan period of 2018 – 2033.
Planning and Environment Decisions Wales (PEDW)	PEDW are an independent body who will be responsible for the formal examination of the RLDP.
Planning Policy Wales (PPW)	Planning policy guidance for Wales produced by the Welsh Government is set out in this document

Preferred Strategy	This sets out the broad strategic direction for the RLDP. This includes the preferred level of growth along with the spatial strategy for distributing the growth. It also includes the vision, issues and objectives of the Plan.
Previously Developed Land	Previously developed land is also known as brownfield land and generally relates to land that is or has been occupied by a permanent structure and associated fixed surface infrastructure. A full definition of previously developed land is provided in PPW including exclusions.
Primary Shopping Frontages (PSF)	Primary Shopping Frontages (PSF) are designated in the RLDP to cover areas in the County's main town centres where retail uses (Use Class A1) predominate. These are located in Abergavenny, Caldicot, Chepstow and Monmouth.
Public Right of Way (PROW)	Paths that the public have a right to pass such as footpaths, bridleways and byways.
Ramsar Site	A Ramsar Site is a wetland of international importance and a statutory international nature conservation designation.
Replacement Local Development Plan (RLDP)	The Replacement Local Development Plan replaces the Adopted Local Development Plan for a given area. See Local Development Plan definition for further information.
Representations	Comments received in relation to the RLDP, either in support of, or in opposition to.
Regionally Important Geological/ Geomorphological Sites (RIGs)	Regionally Important Geological/Geomorphological Sites (RIGs) are non-statutory sites selected for their scientific, educational, historical and aesthetic features.
Section 106 Agreement (S106)	A legal agreement between the LPA and applicant/developer to ensure a development is carried out in a certain way and/or monetary contributions are collected to support different needs associated with the site. S106 are also known as planning obligations.
Site of Importance for Nature Conservation (SINC)	Site of Importance for Nature Conservation (SINC) are non-statutory local nature conservation designations recognised for their importance for wildlife.
Site of Special Scientific Interest (SSSI)	Sites of Special Scientific Interest (SSSI) are statutory national nature conservation designations protected to safeguard the range, quality and variety of habitats, species and geological features.
Soundness Tests	In order to adopt a RLDP it must be determined to be 'sound' by the Planning Inspector. The Tests of Soundness are set out in the Development Plans Manual (Edition 3, March 2020). There are three tests to make that

	judgement in relation to the Plan as a whole. A framework for assessing the soundness of LDPs has been developed by the Planning Inspectorate.
Special Area of Conservation (SAC)	Special Areas of Conservation (SAC) are statutory international nature conservation designations protected for a wide range of habitats and species other than birds.
Special Protection Area (SPA)	Special Protection Areas (SPA) are statutory international nature conservation designations and are of importance due to rare or migratory birds and their habitats.
Strategic Environmental Assessment (SEA)	Generic term used internationally to describe environmental assessment as applied to policies, Plans and programmes. The European Strategic Environmental Assessment Directive (2001/42/EC) requires a formal "environmental assessment of certain Plans and programmes, including those in the field of planning and land use".
Strategic Development Plan (SDP)	A Strategic Development Plan is a tool for regional planning to cover cross-boundary issues such as housing and transport. It will be prepared by a Strategic Planning Panel across a region. LPA's must have regard to the SDP when developing their RLDPs.
Supplementary Planning Guidance (SPG)	Provide more detailed or site specific guidance on the application of RLDP Policies. They provide supplementary information in respect of the policies in a LDP. SPG does not form part of the RLDP and is not subject to independent examination.
Integrated Sustainability Appraisal (ISA)	Tool for appraising policies, including LDPs, to ensure they reflect sustainable development objectives (i.e. social, environmental and economic factors). Each LPA is required by Section 62(6) of the Act to undertake SA of their Local Development Plan. This form of sustainability appraisal fully incorporates the requirements of the Strategic Environmental Assessment Directive.
Well-being of Future Generations (Wales) Act (2015)	The Well-being of Future Generations (Wales) Act 2015 is legislation that requires public bodies, such as local authorities, to put long term sustainability at the forefront of their thinking to make a difference to lives of people in Wales. Local authorities must work towards the seven well-being goals and enact the five ways of working set out in the Act.

APPENDIX 1

Replacement Local Development Plan

2018-2033

Proposals Plan Inset Maps

monmouthshire
sir fynwy

Key

Development: General

Monmouthshire County Boundary

Settlement Boundaries

Green Infrastructure, Landscape & Nature Recovery

Bannau Brycheiniog National Park LC3

Blaenavon Industrial Landscape World Heritage Site LC2

Wye Valley Natural Landscape (AONB) LC4

Green Wedge GW1

Placemaking & Design

Conservation Areas HE1

Residential Allocations

Strategic Sites HA1-4

Mixed Use Sites HA1-3, 9

Primary Settlement Sites HA1-4

Secondary Settlement Sites HA5-9

Main Rural Settlement Sites HA10-18

Gypsy And Traveller Sites S9

Retail & Commercial Centres

Central Shopping and Commercial Areas RC1

Primary Shop Frontages RC2

Local Centres RC3

Neighbourhood Centres RC3

Employment & Economy

Protected Employment Sites EA2

Identified Industrial and Business Sites EA1

Waste

Identified Potential Waste Management Sites W3

Minerals

Minerals Safeguarding - Limestone M2

Minerals Safeguarding - Sand and Gravel M2

Minerals Safeguarding - Limestone Quarry Buffer Zone M3

Climate Change

Solar Sites CC2

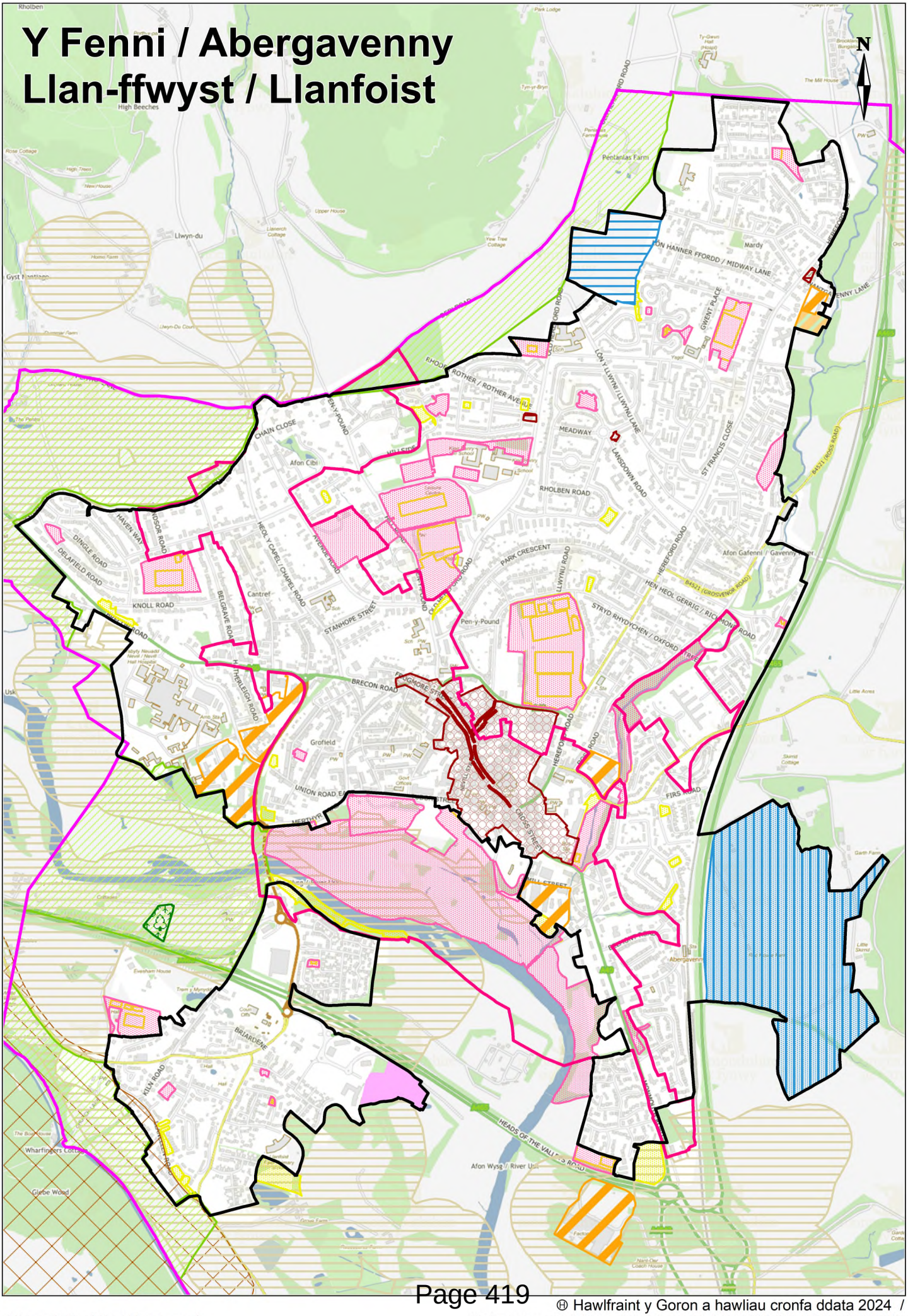
Community Infrastructure

Areas of Amenity Importance CI4

Open Space CI3

Allotments CI3

Y Fenni / Abergavenny
Llan-ffwyst / Llanfoist



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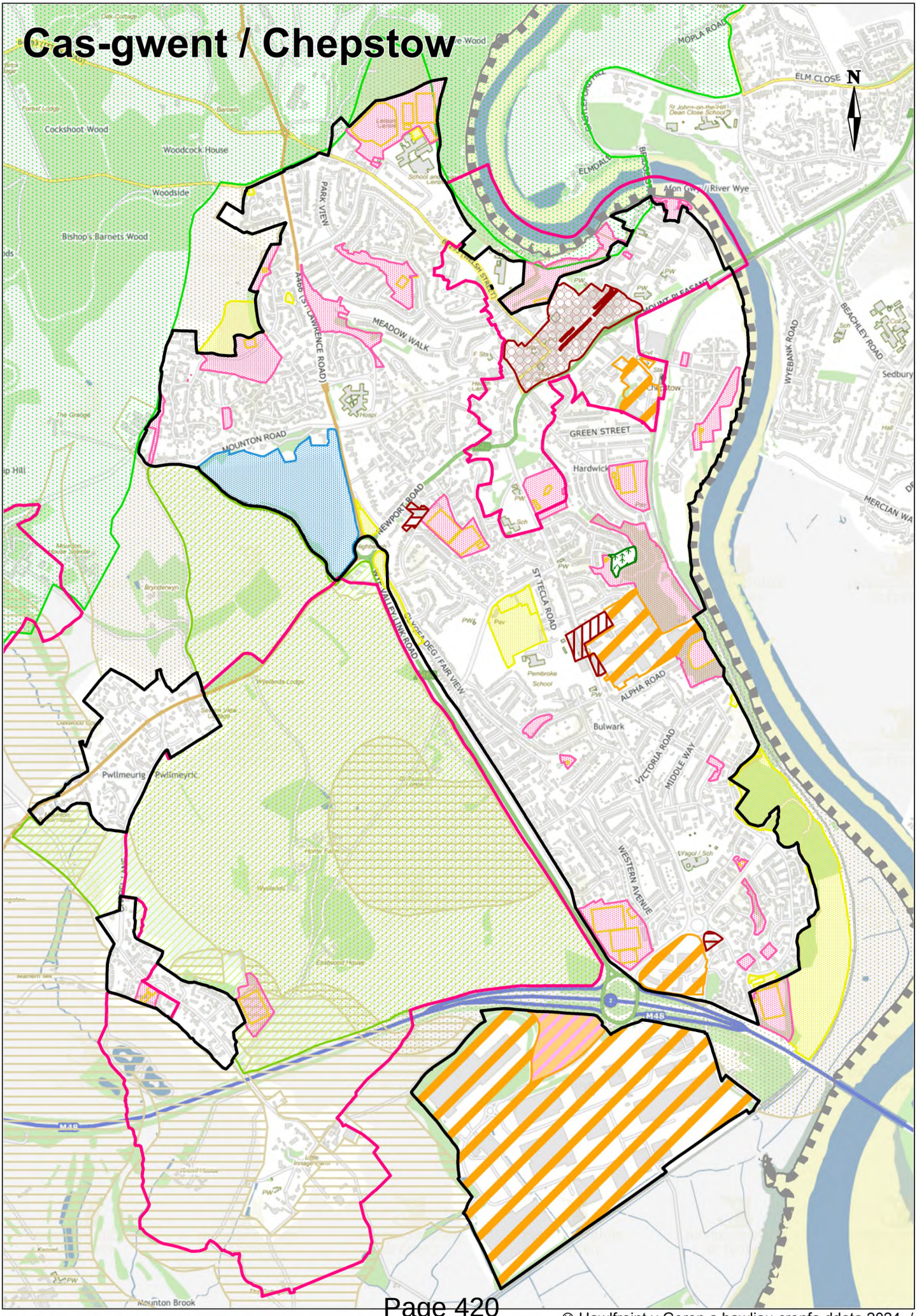
Cas-gwent / Chepstow



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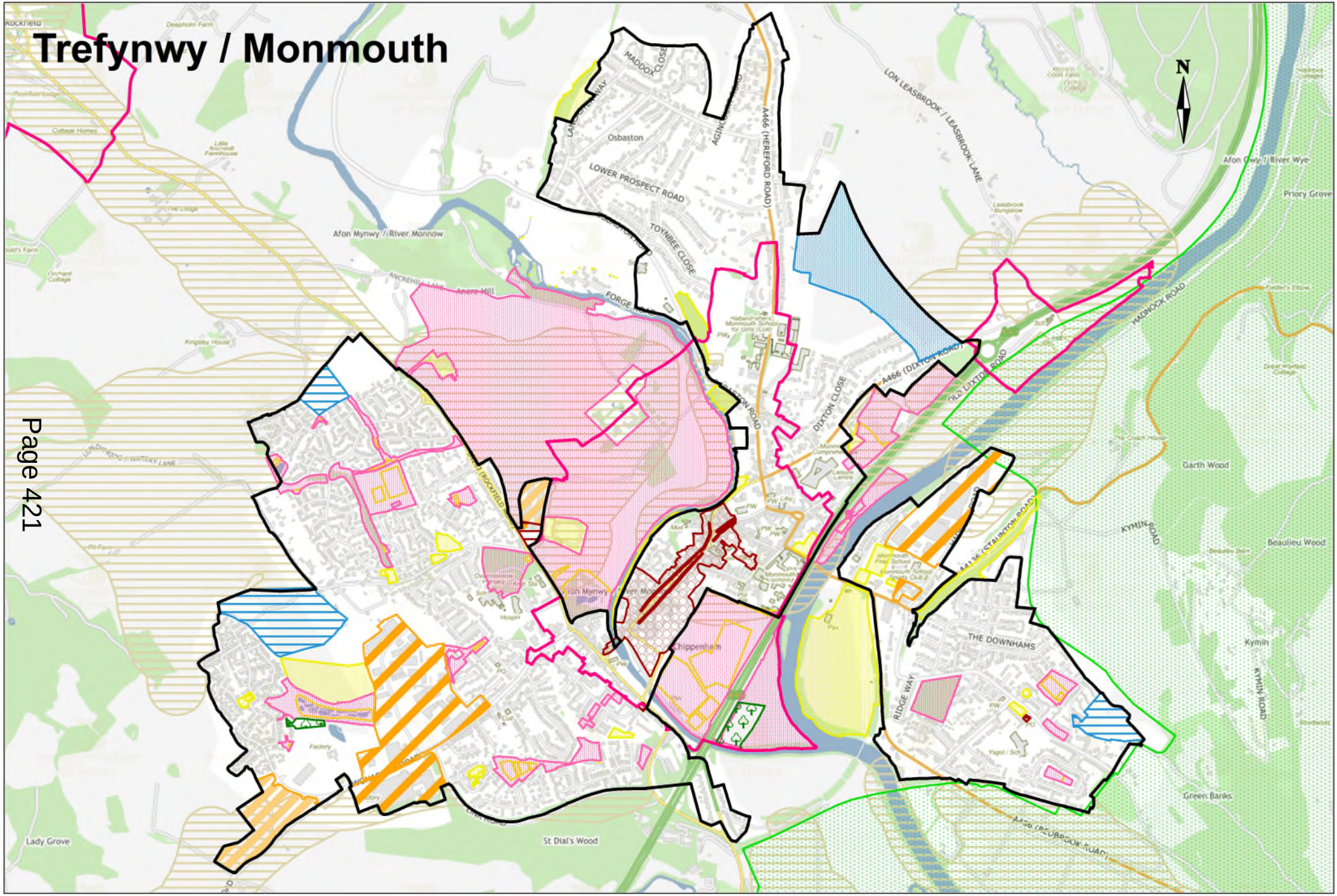
Trefynwy / Monmouth



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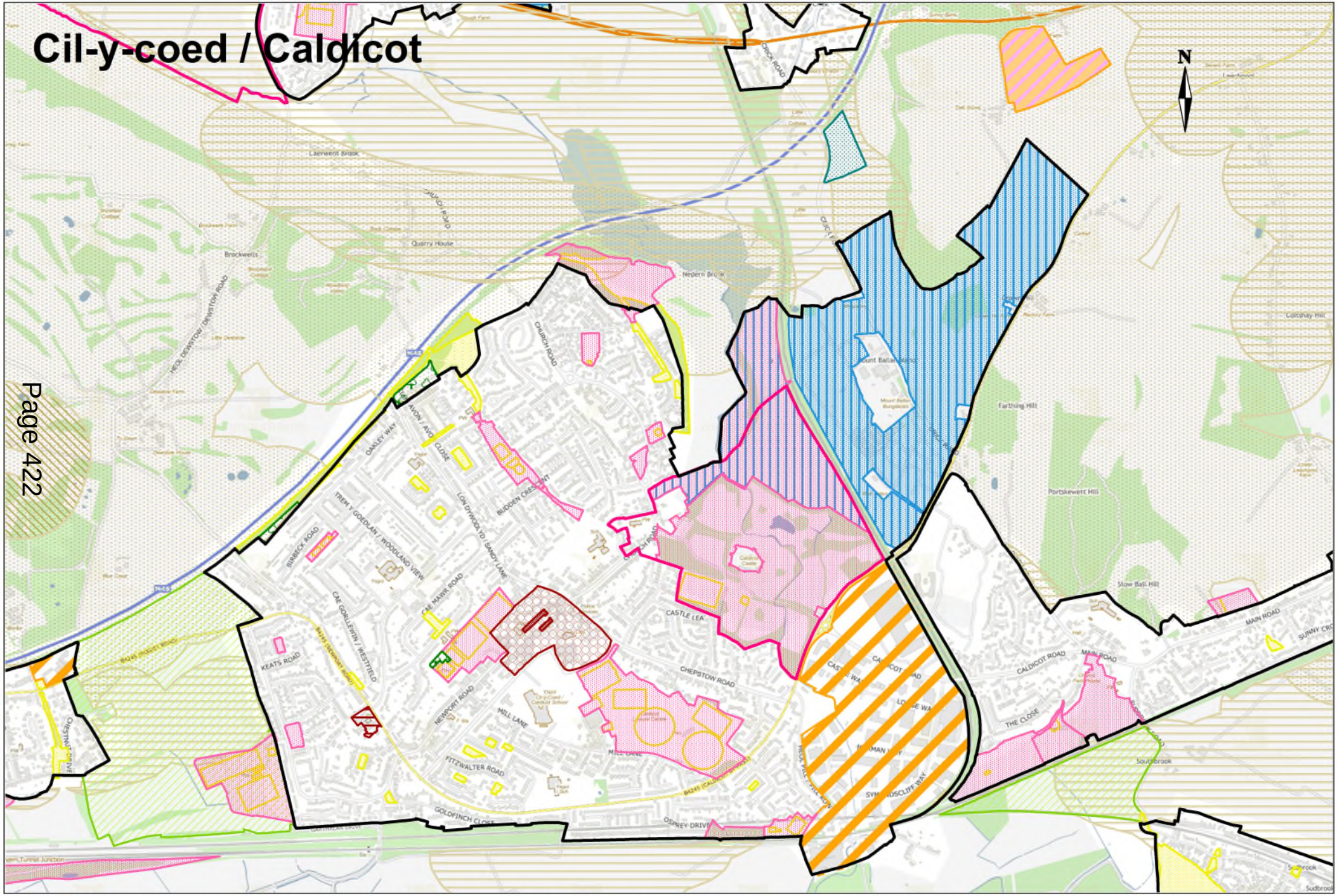
Cil-y-coed / Caldicot



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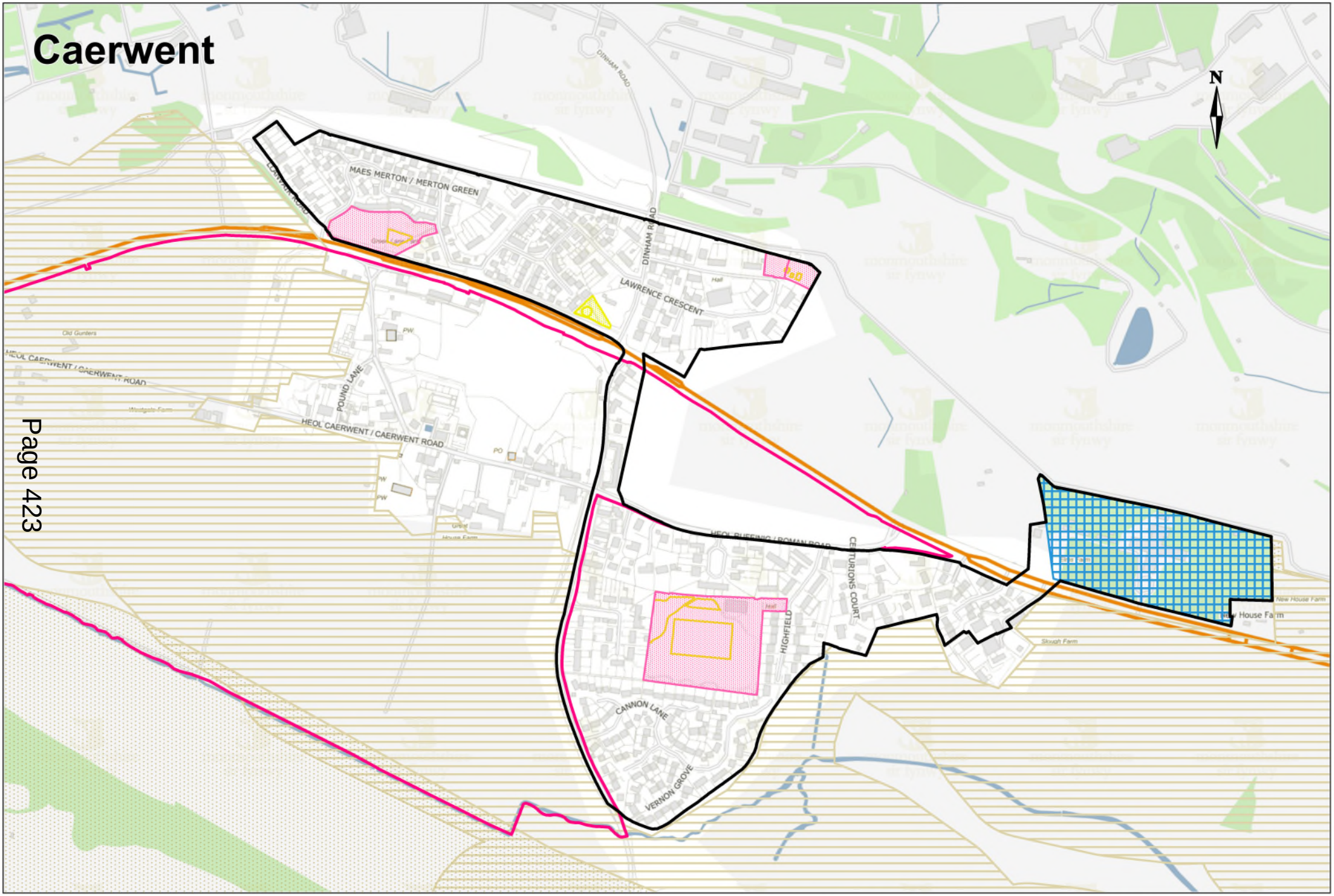
Caerwent



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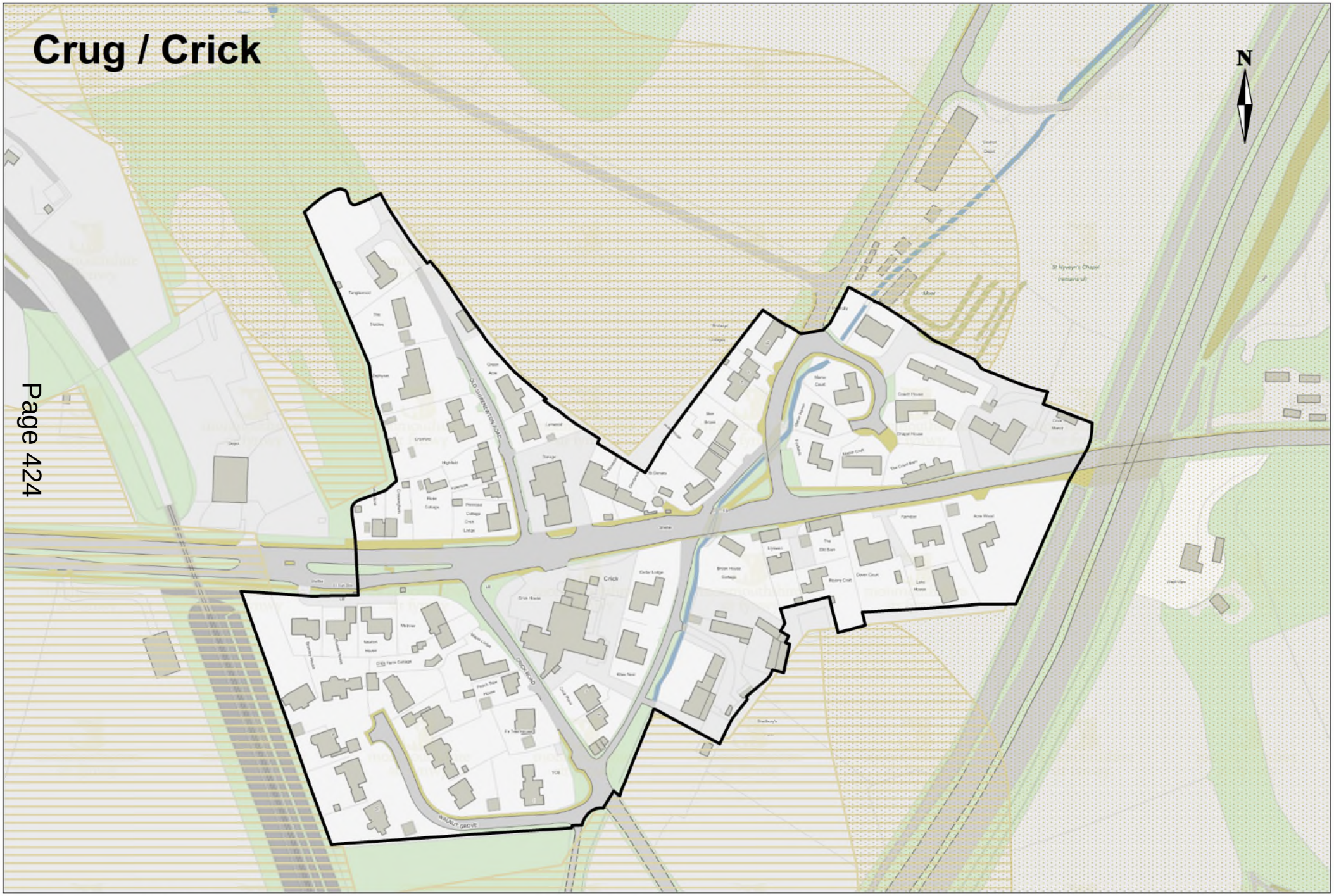
Crug / Crick



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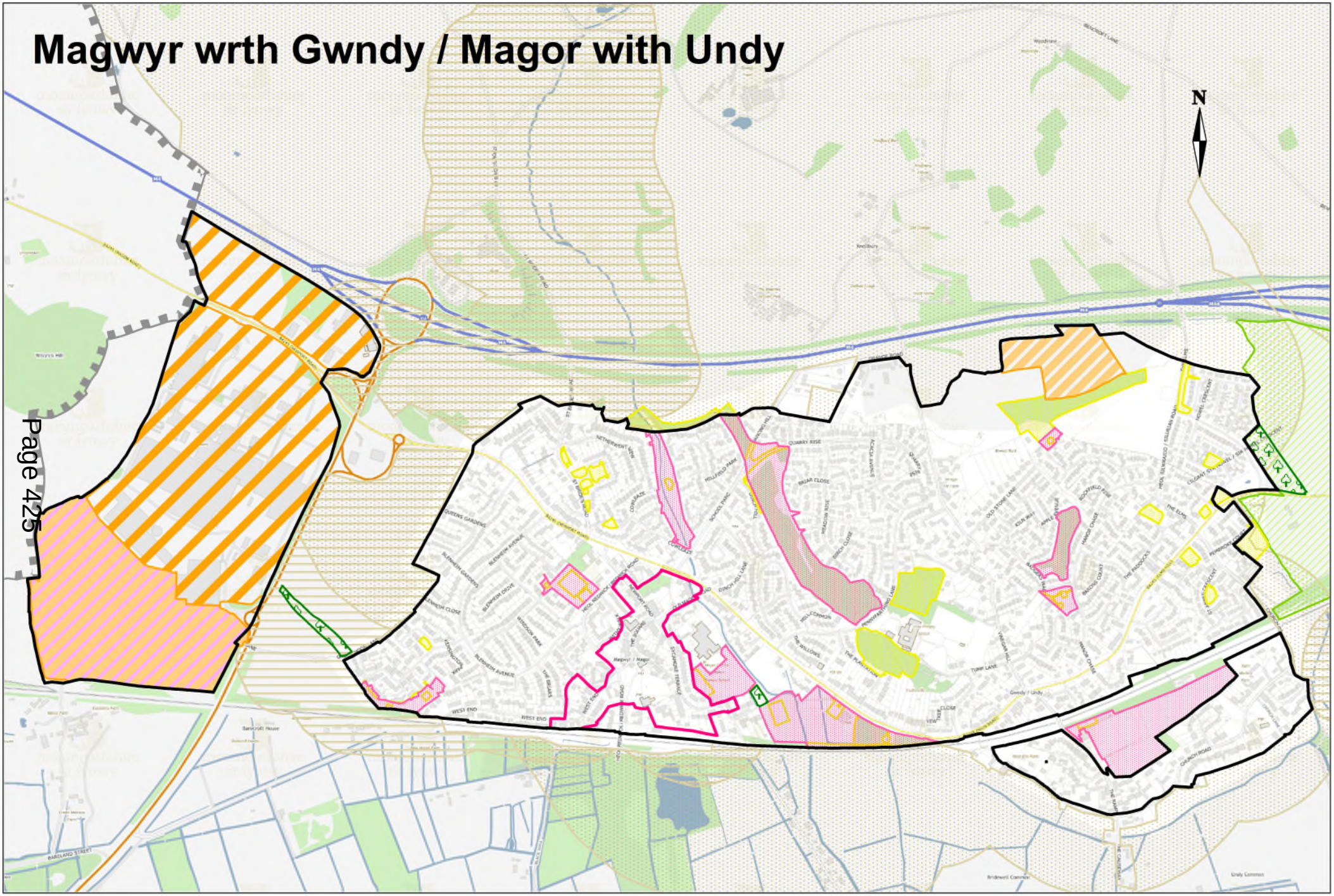
Magwyr wrth Gwndy / Magor with Undy



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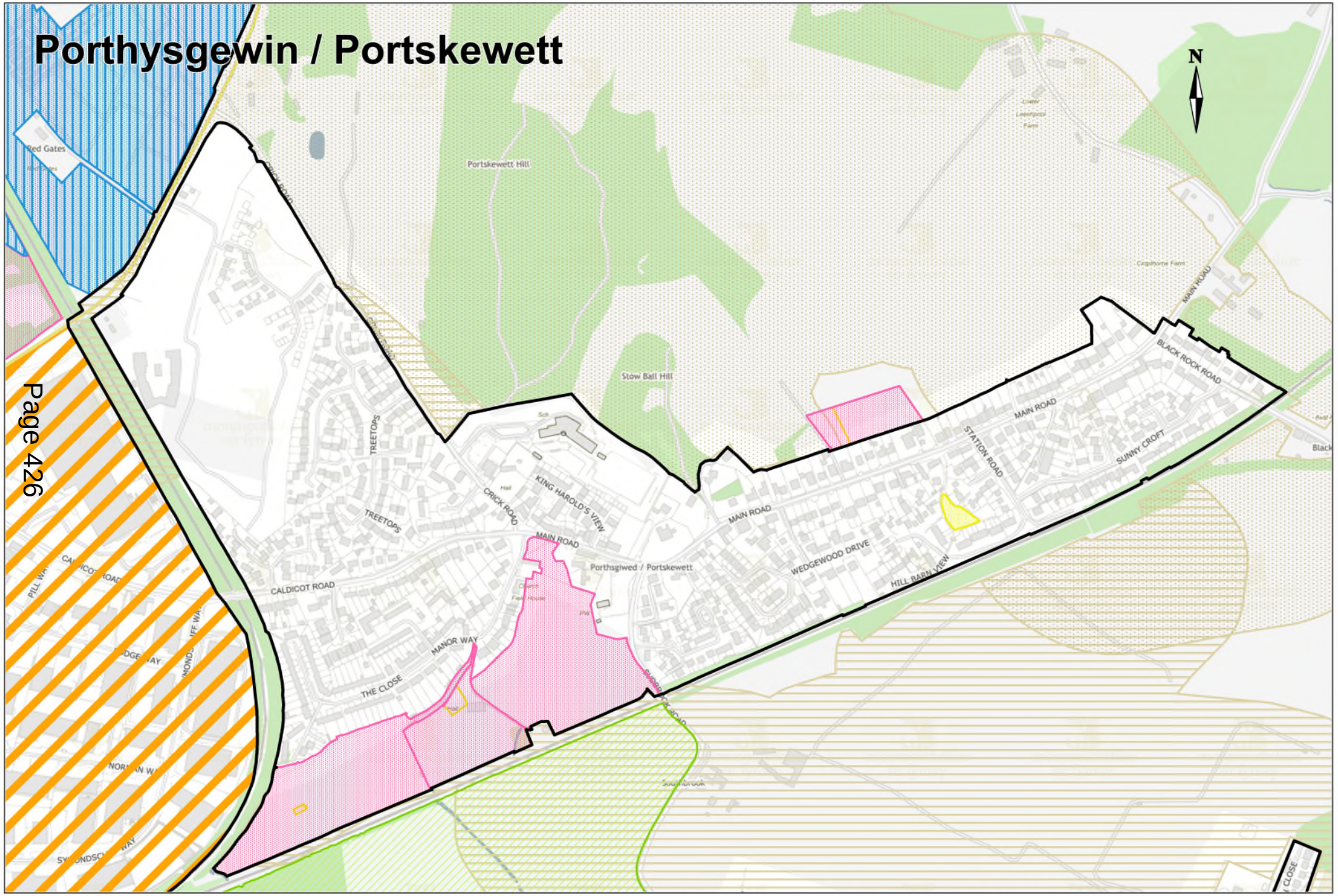
Porthysgewin / Portskewett



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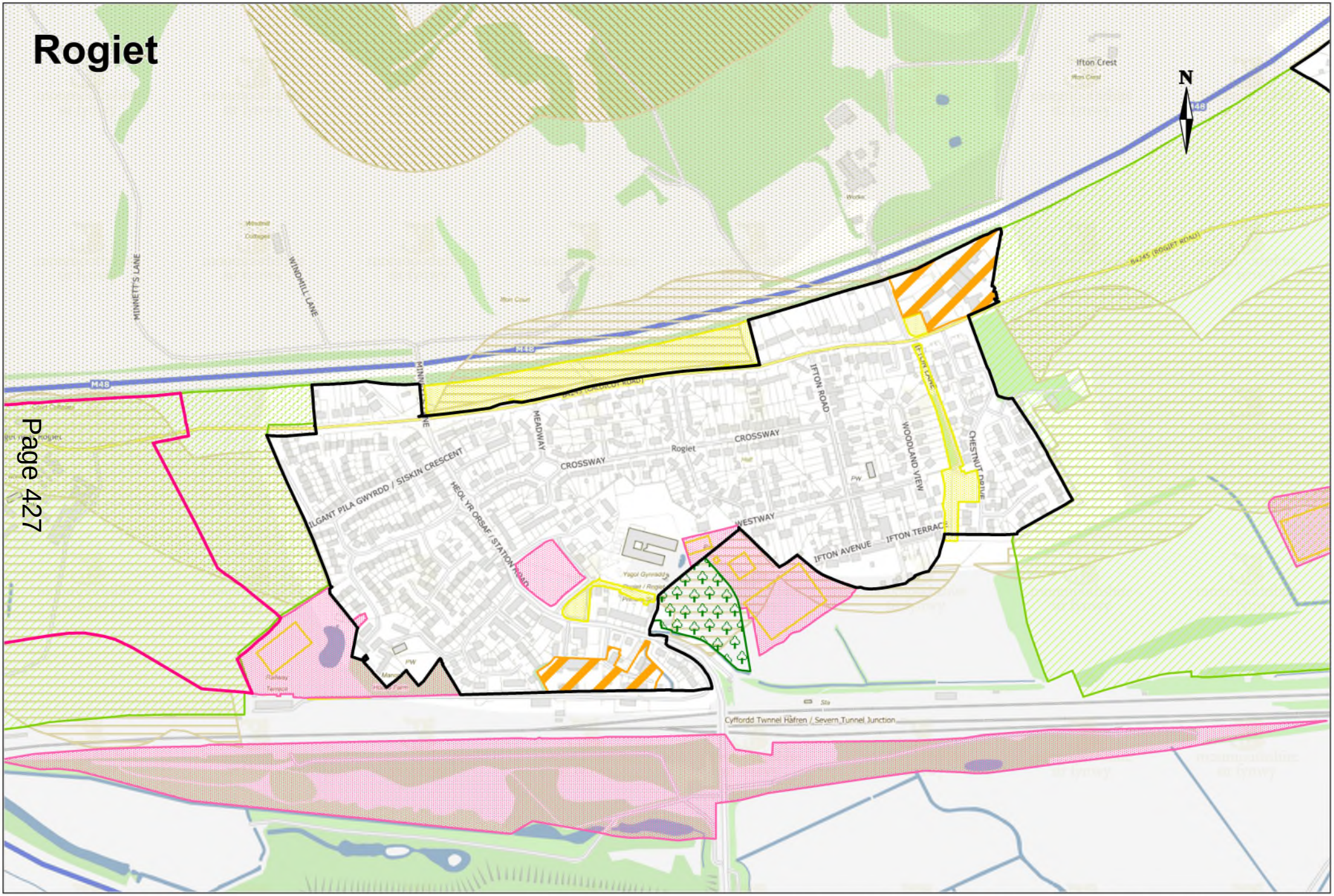
Rogiet



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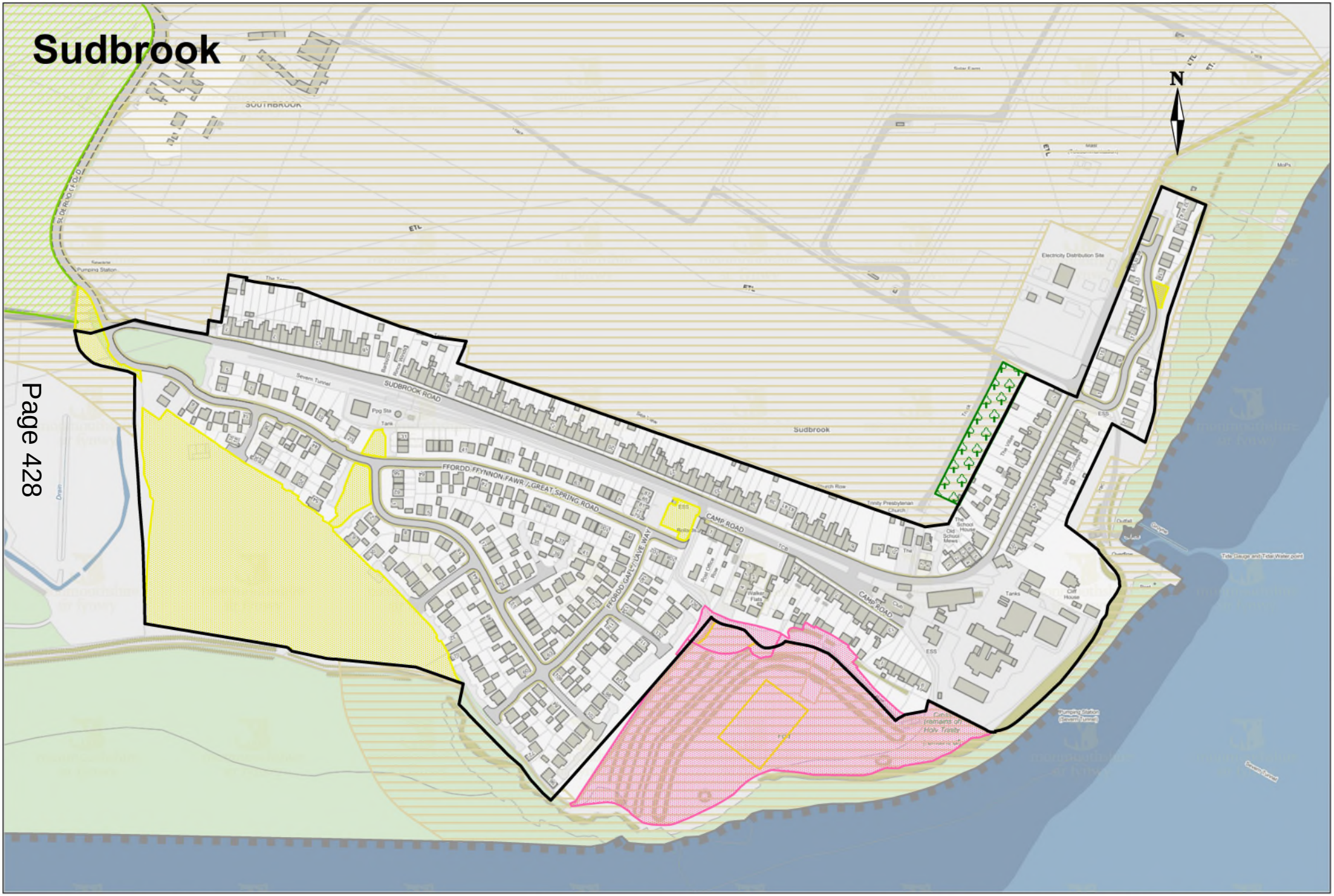
Sudbrook



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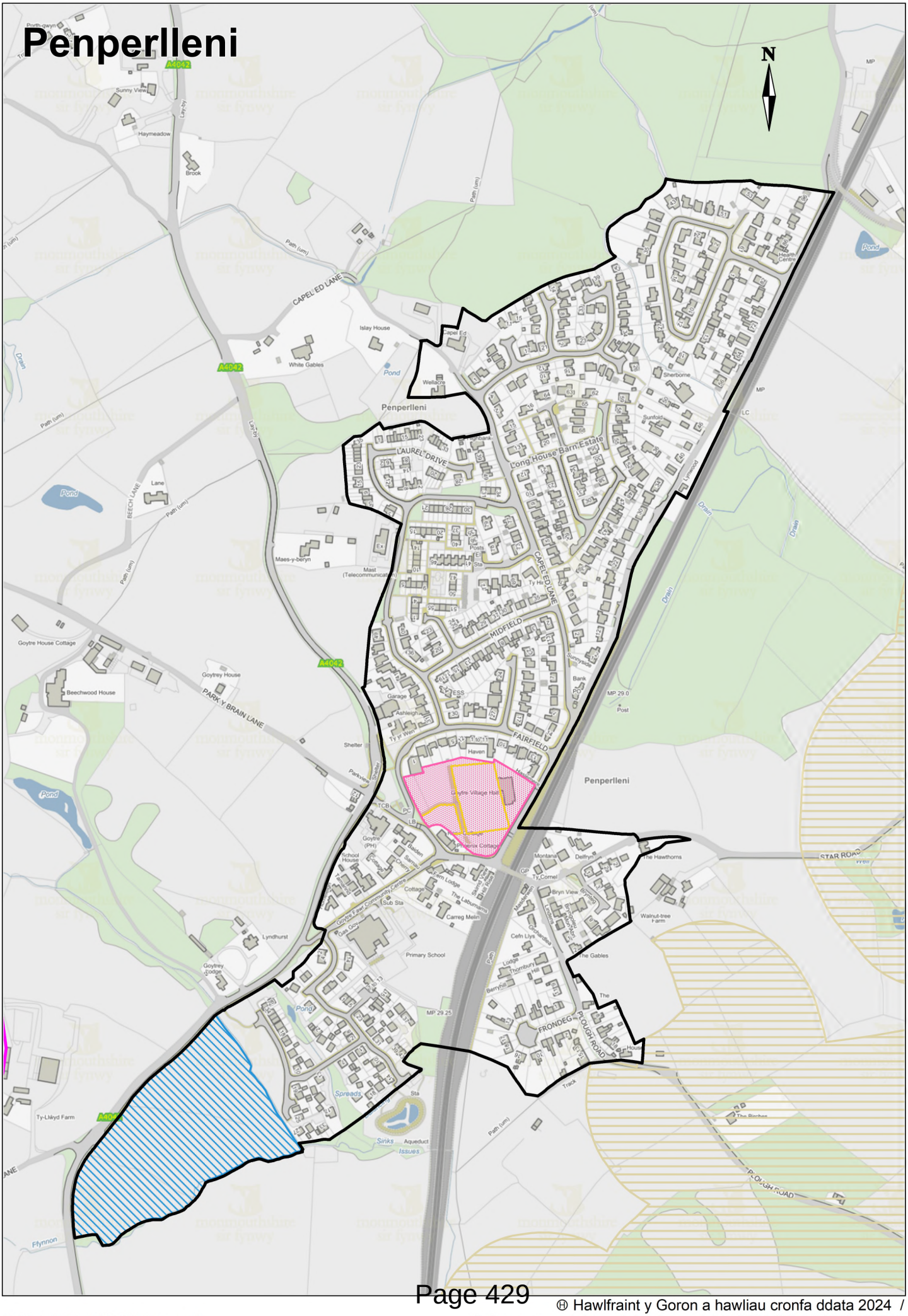
Penperlleni



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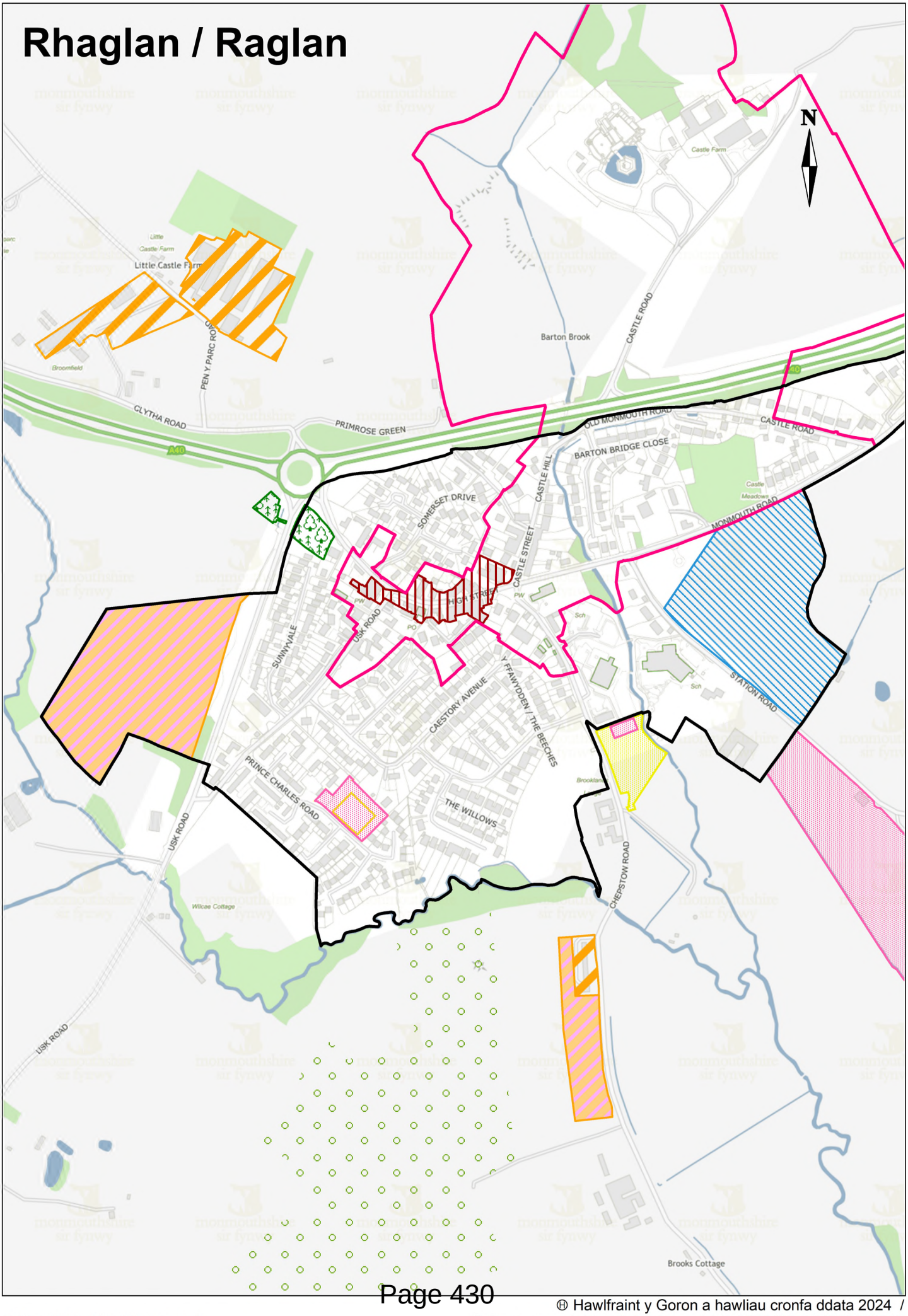
Rhaglan / Raglan



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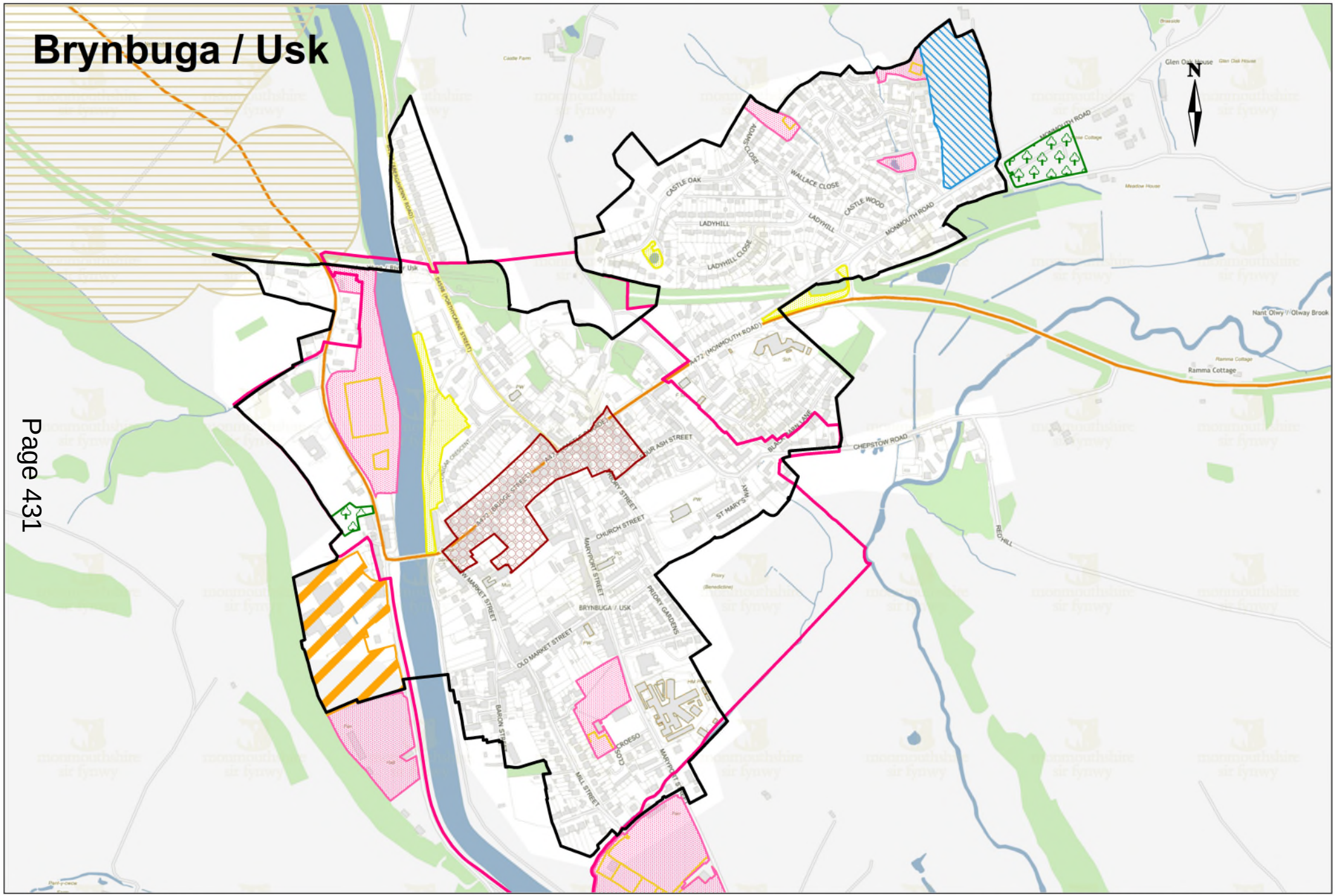
Brynbuga / Usk



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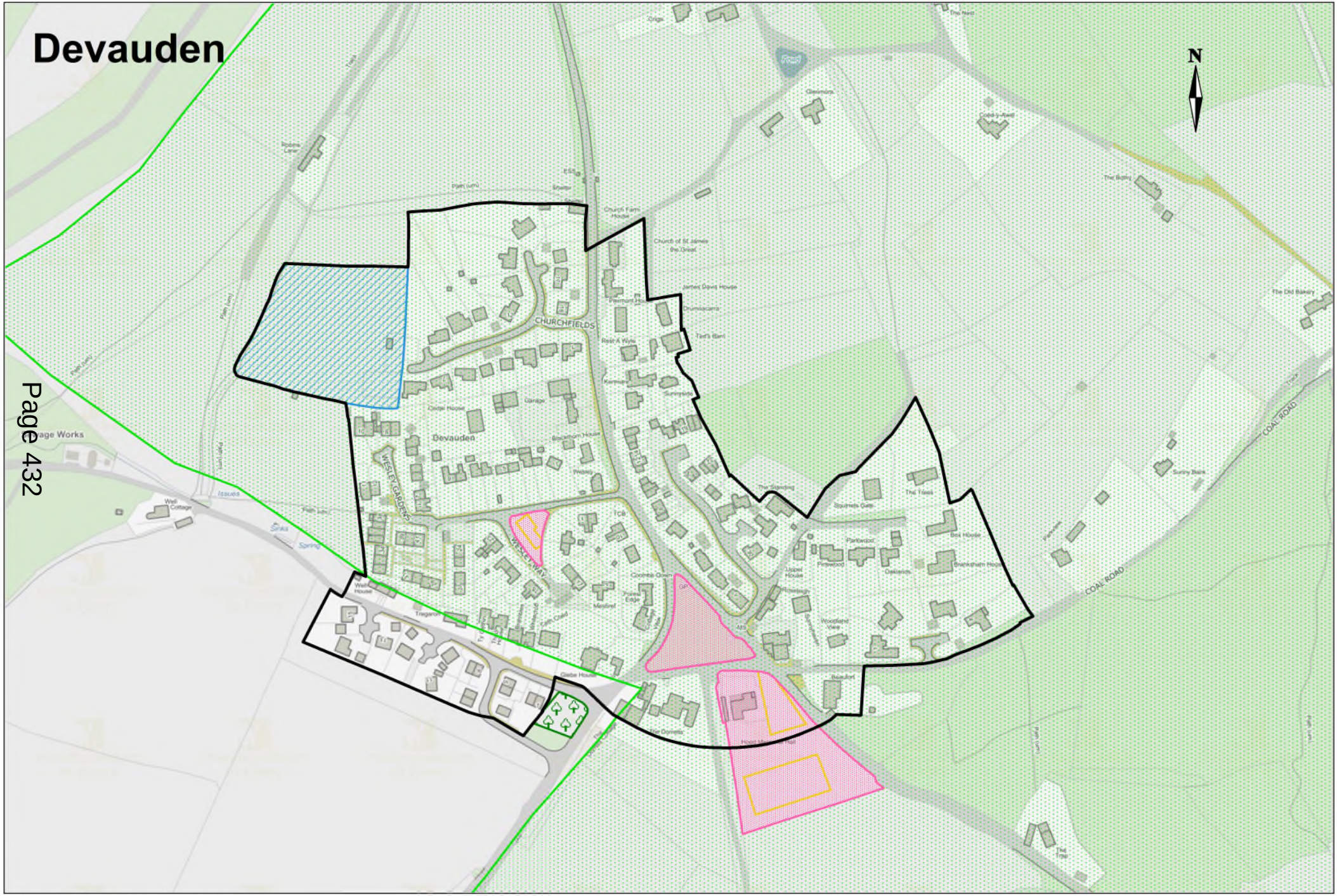

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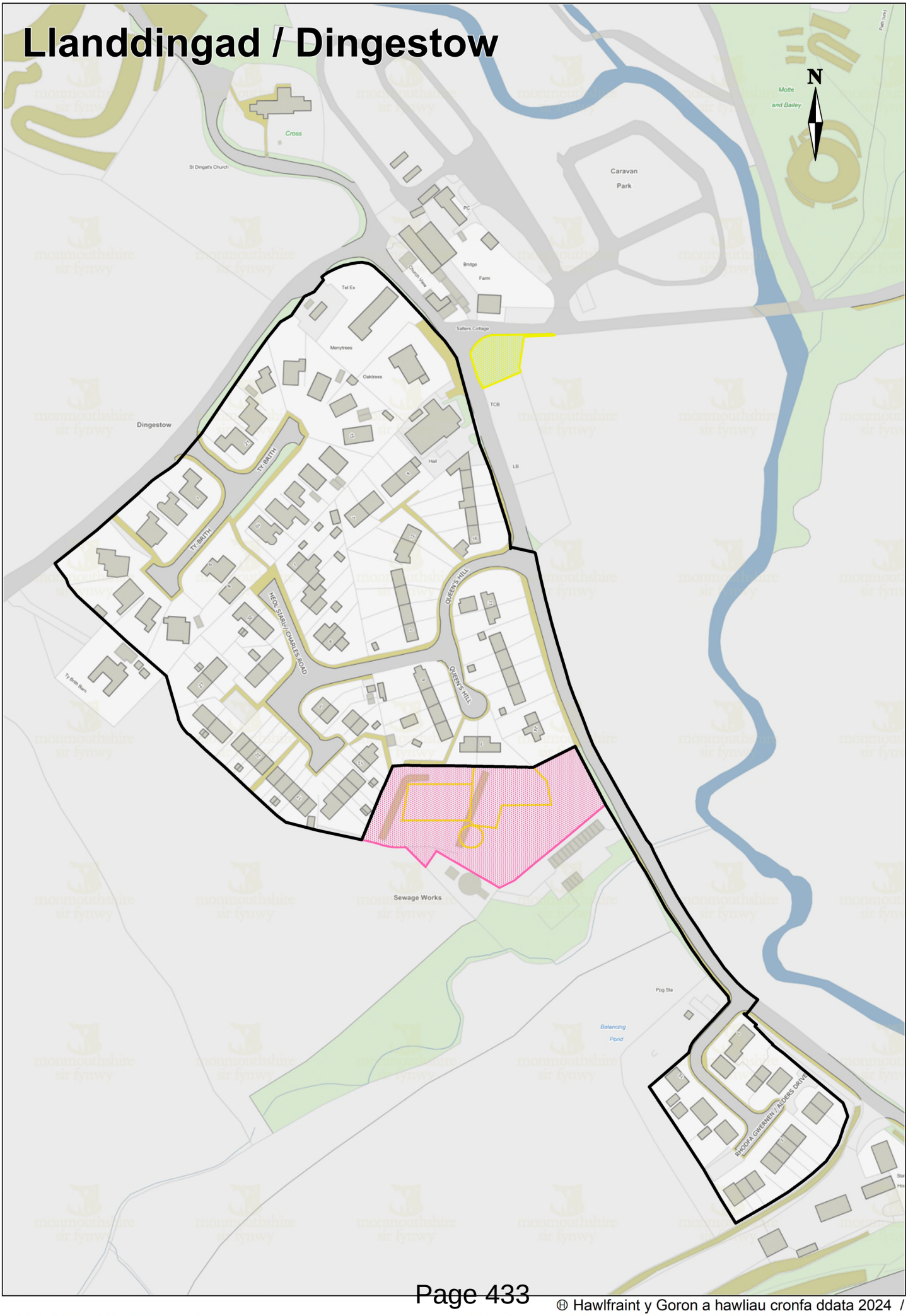
Llanddingad / Dingestow



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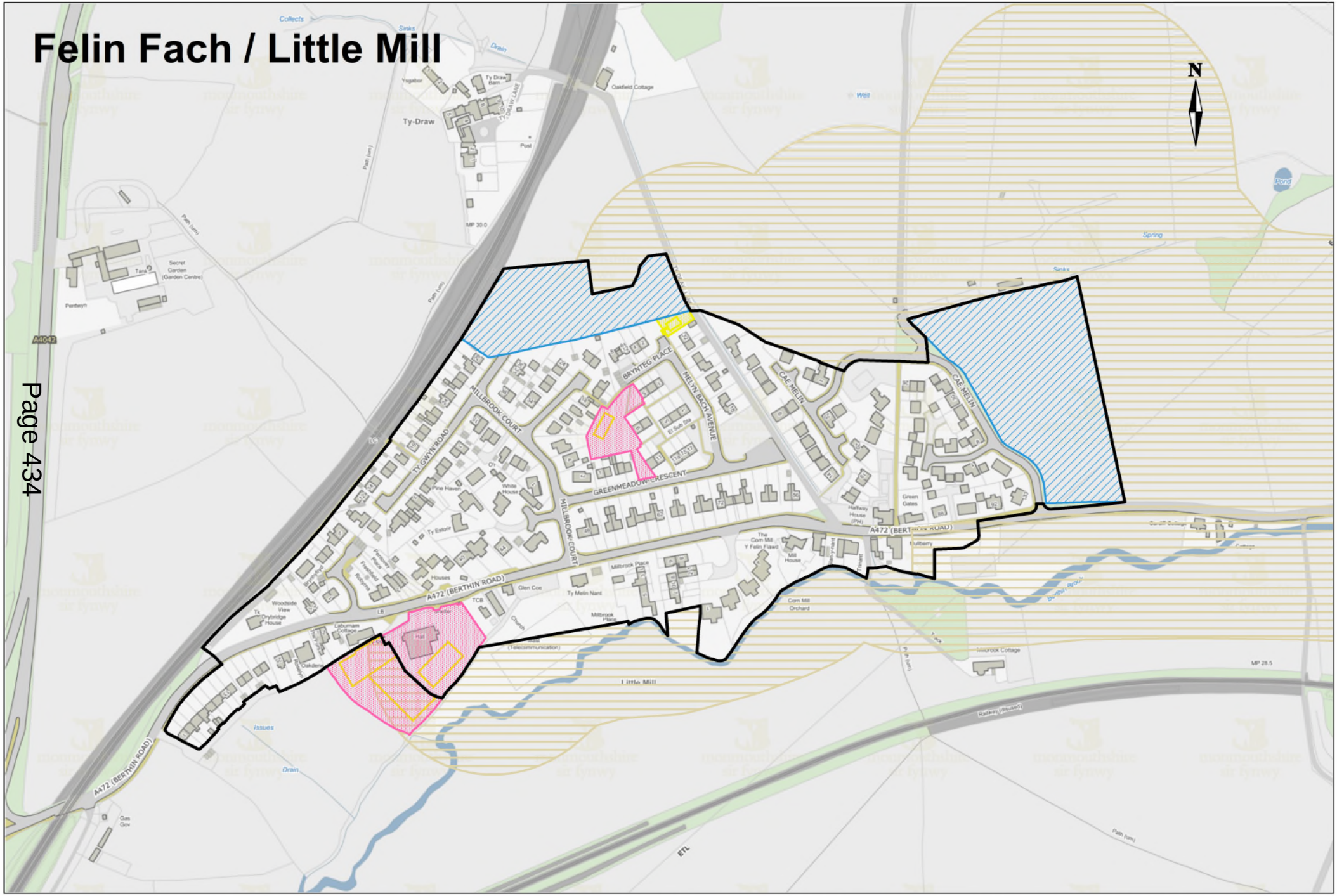
Felin Fach / Little Mill



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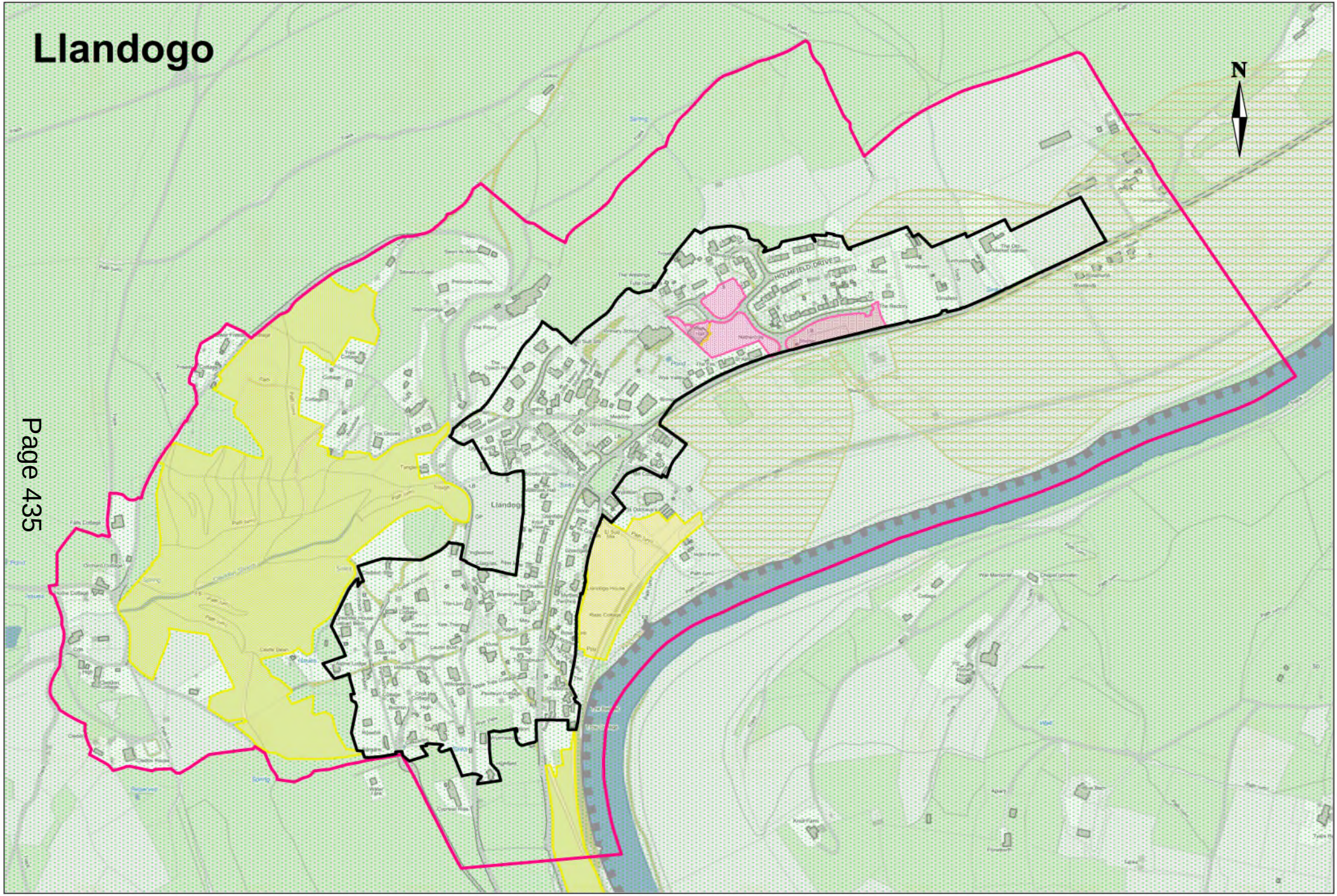
Llandogo



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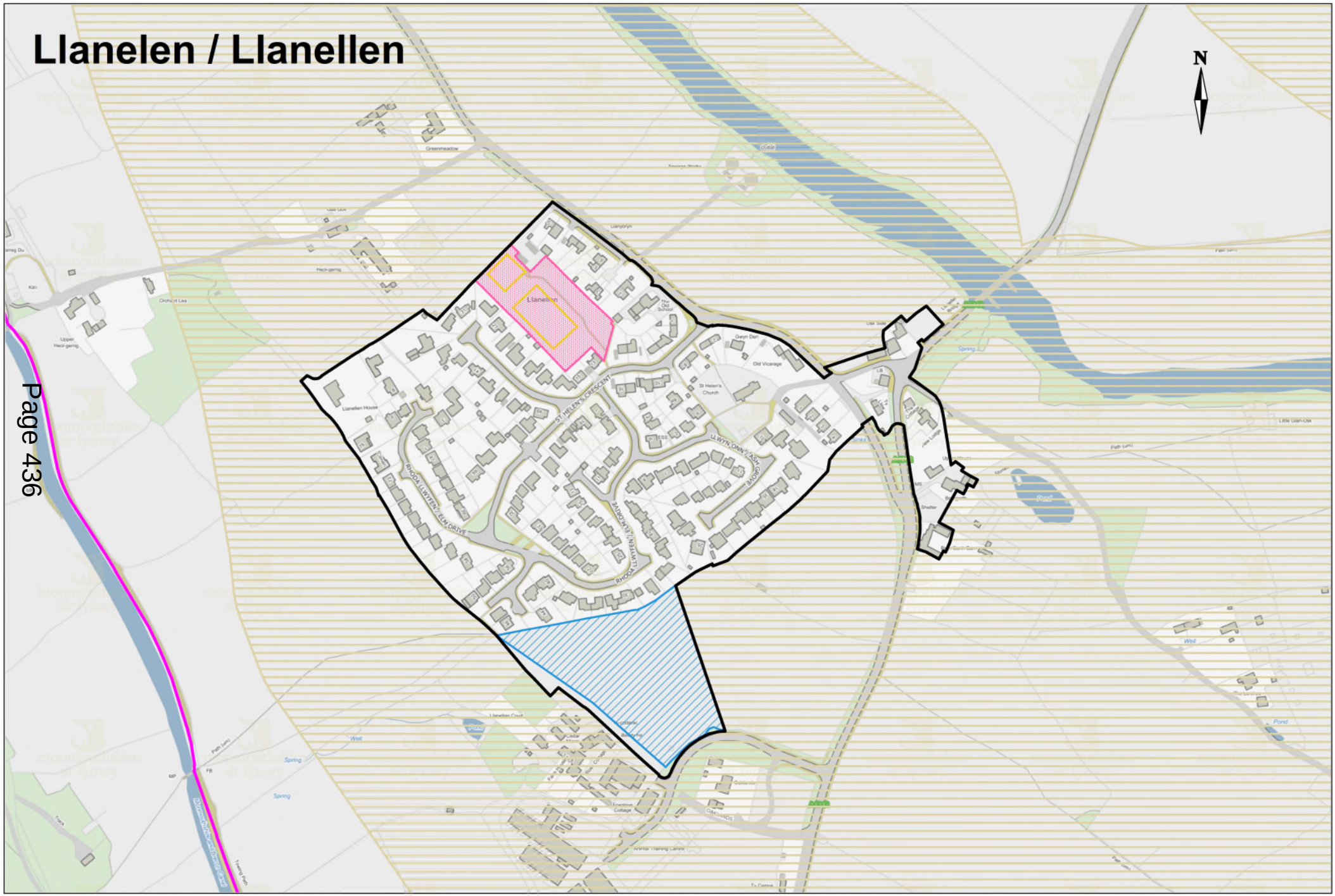
Llanelen / Llanellen



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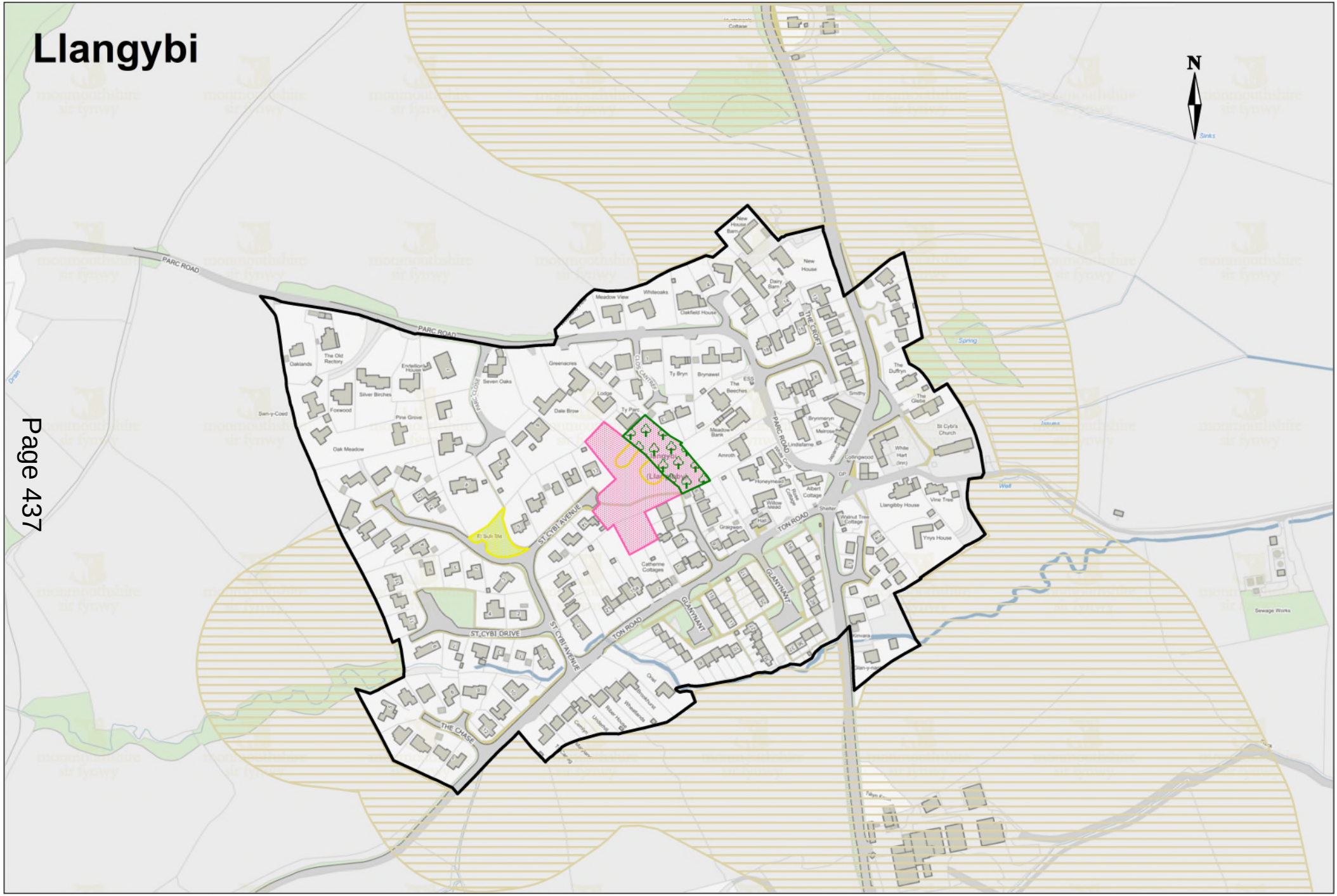
Llangybi



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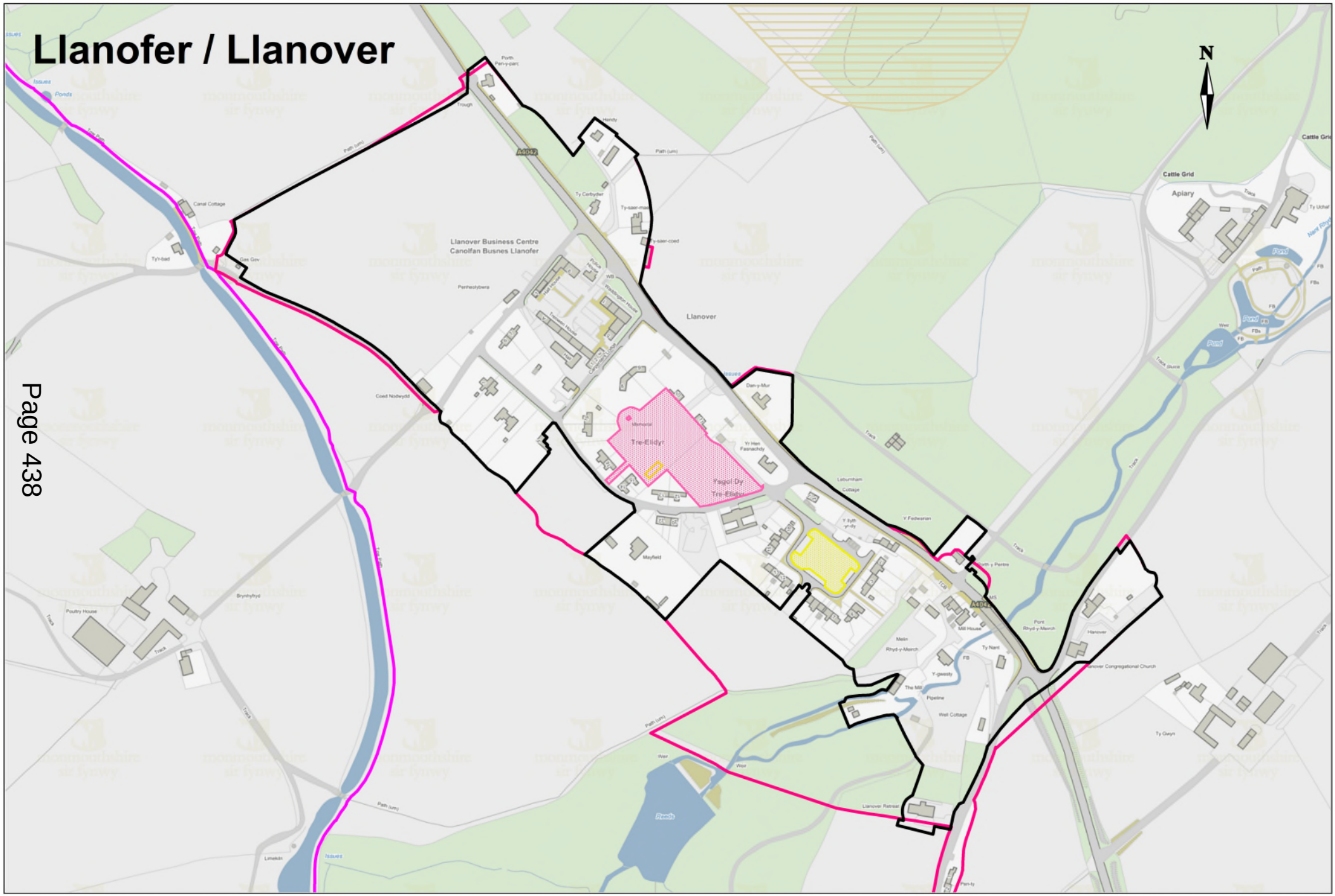
Llanofer / Llanover



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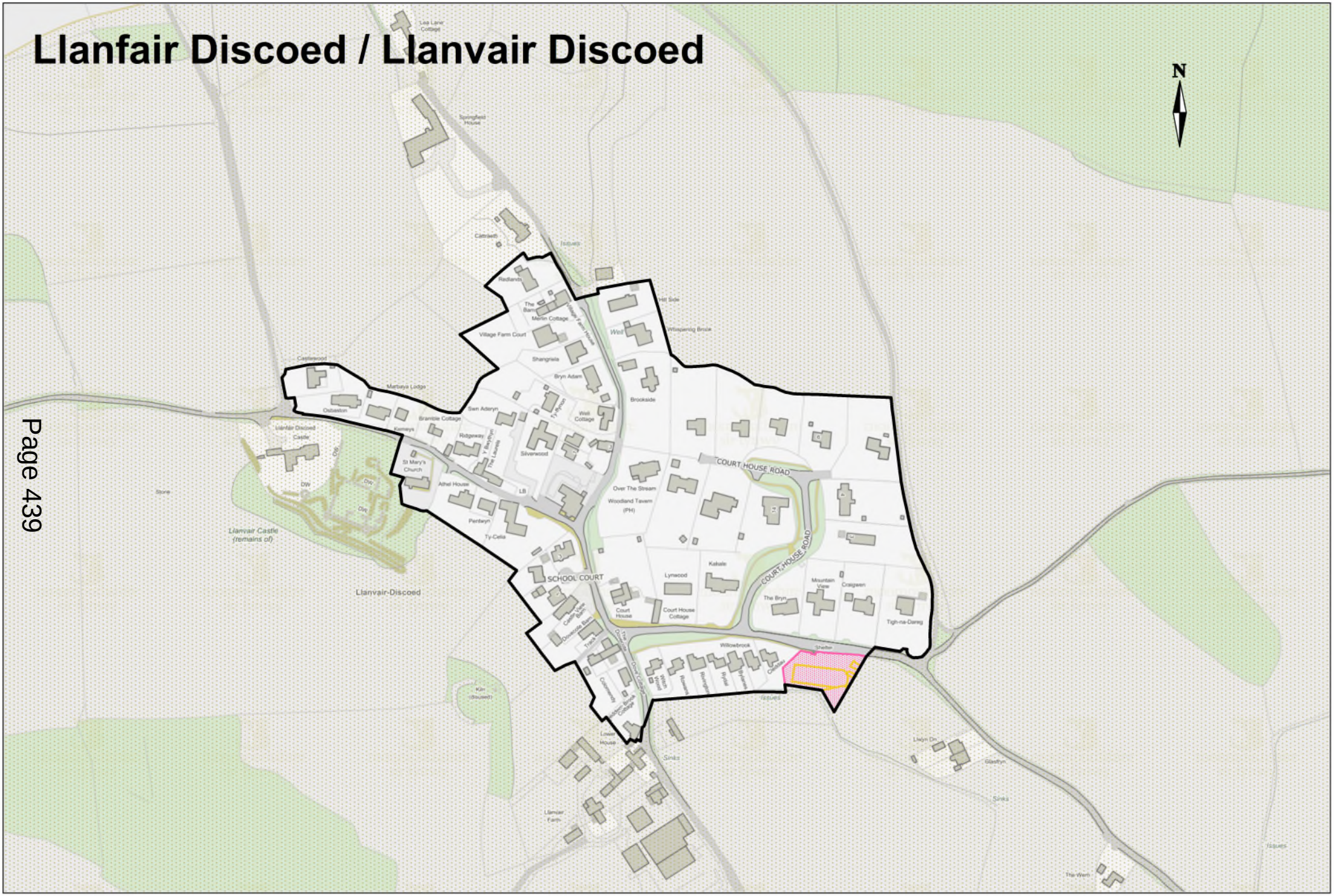
Llanfair Discoed / Llanvair Discoed



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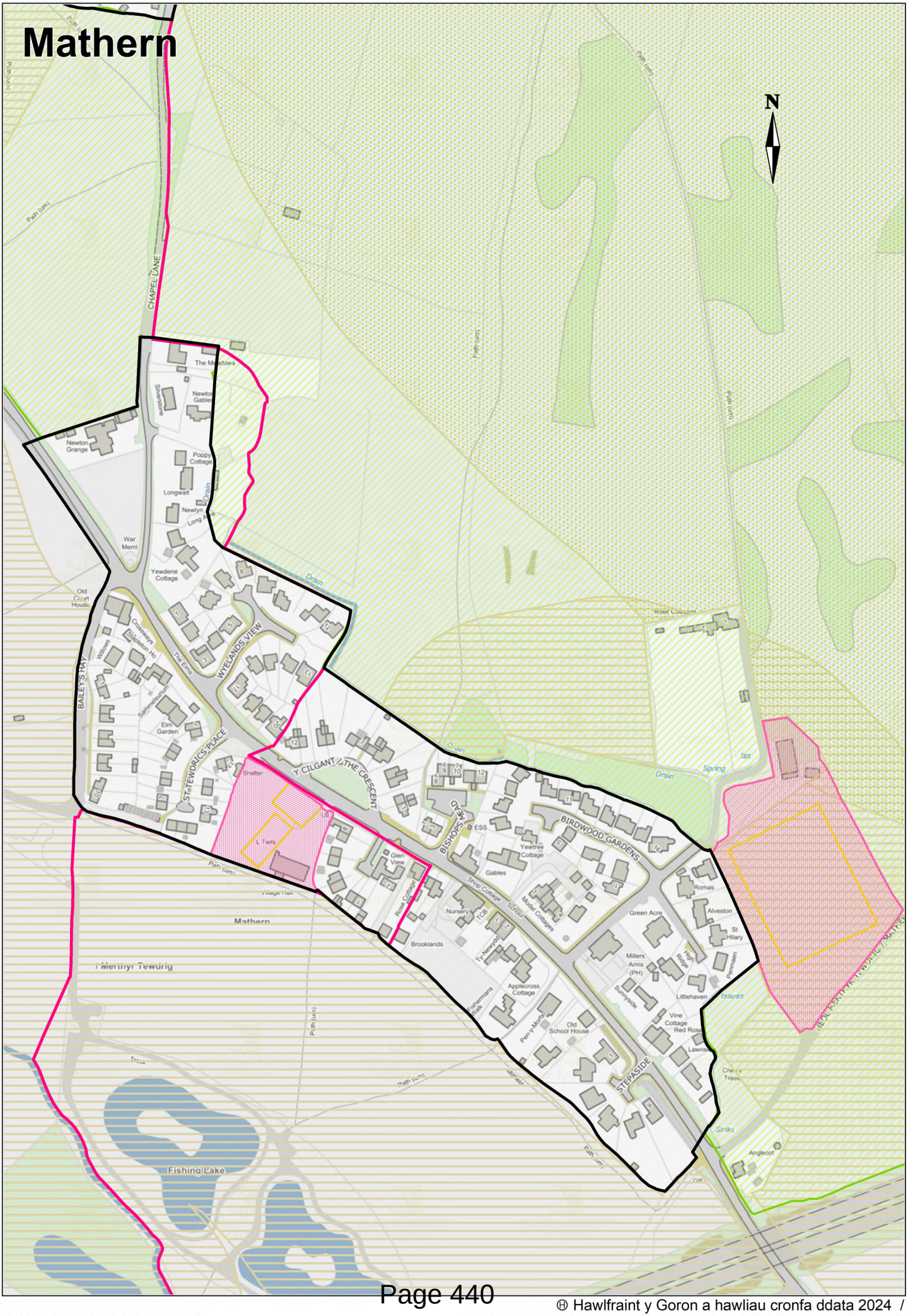

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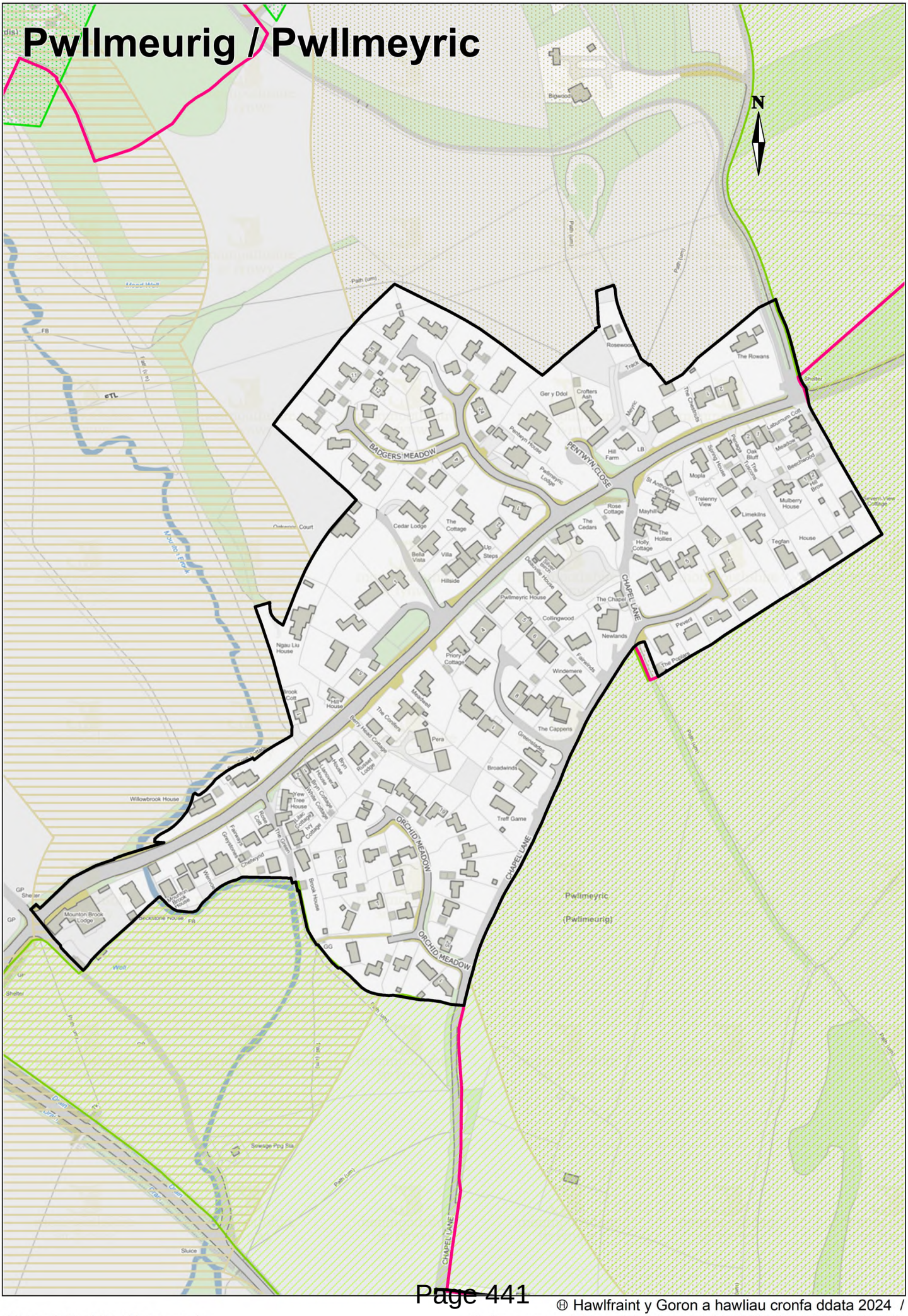
Pwllmeurig / Pwllmeyric



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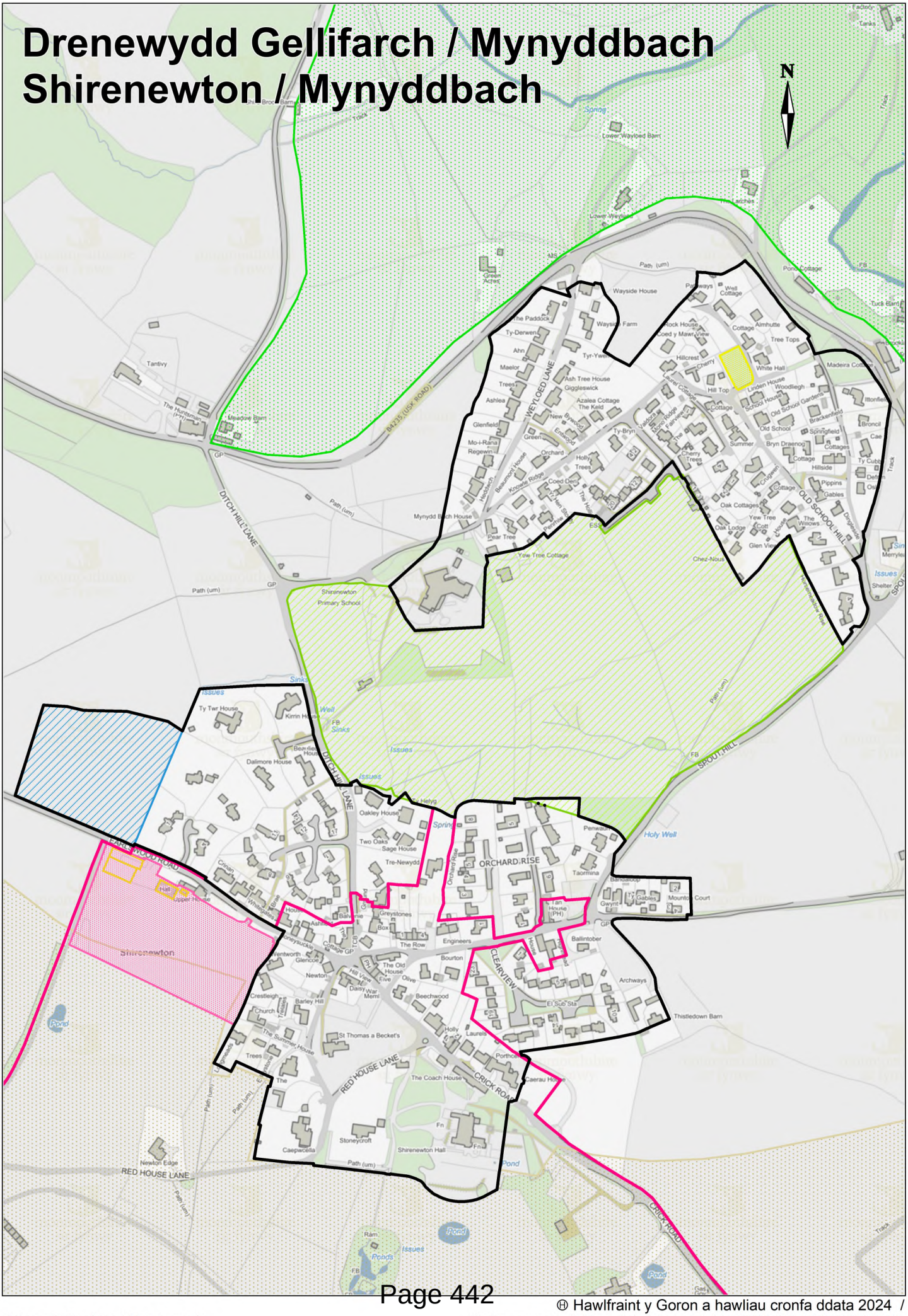
Drenewydd Gellifarch / Mynyddbach
Shirenewton / Mynyddbach



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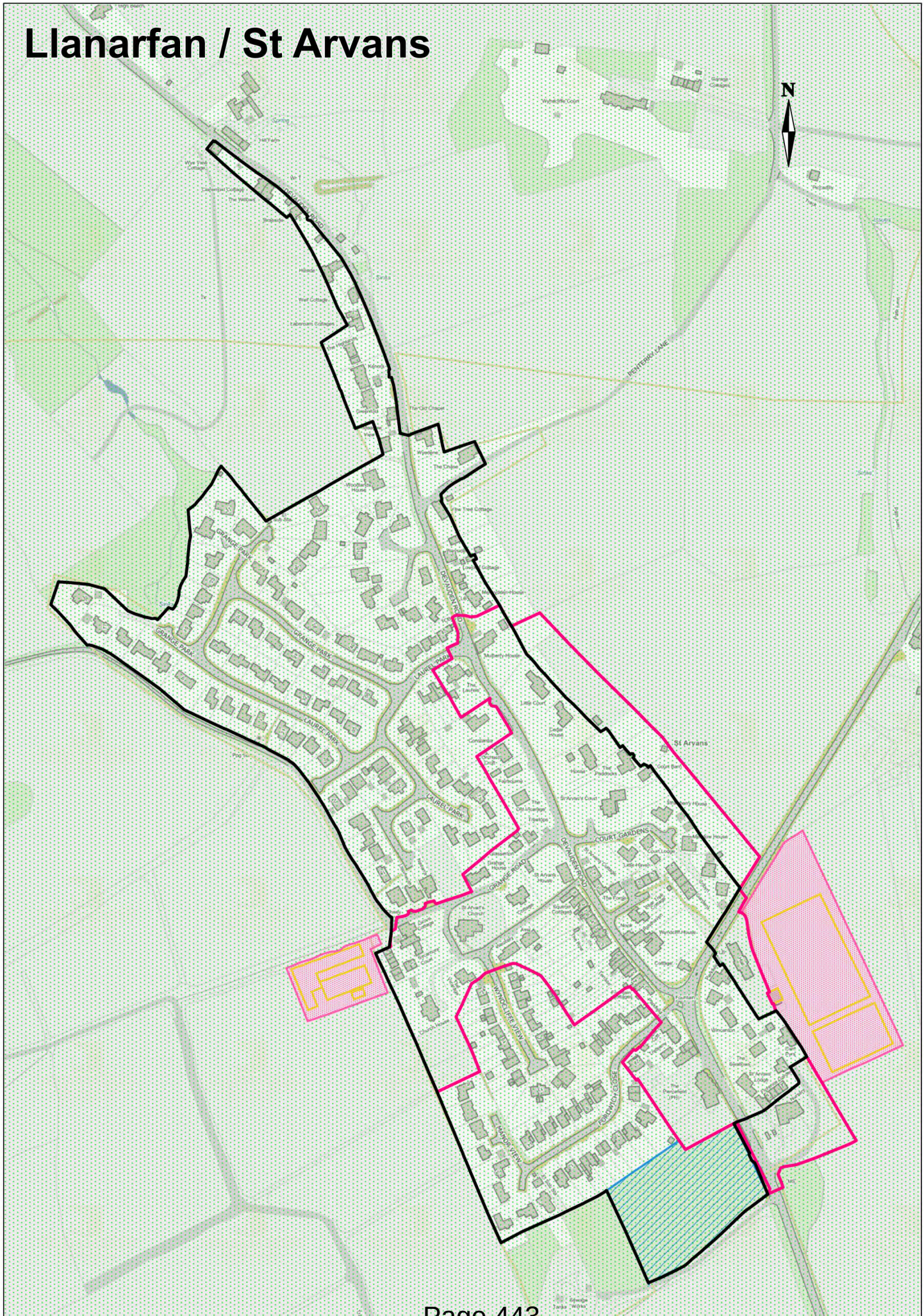
Llanarfan / St Arvans



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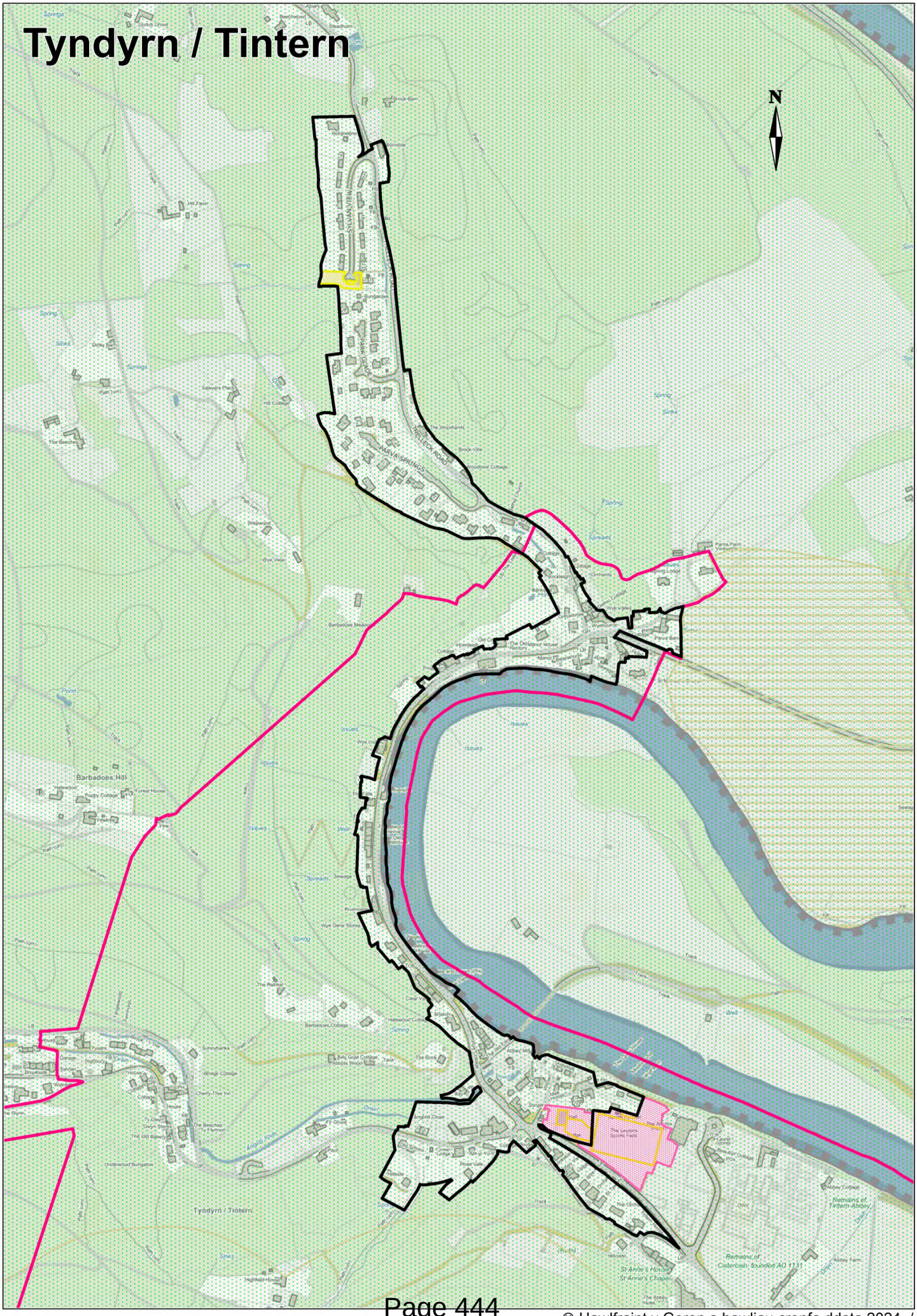
Tyndyrn / Tintern



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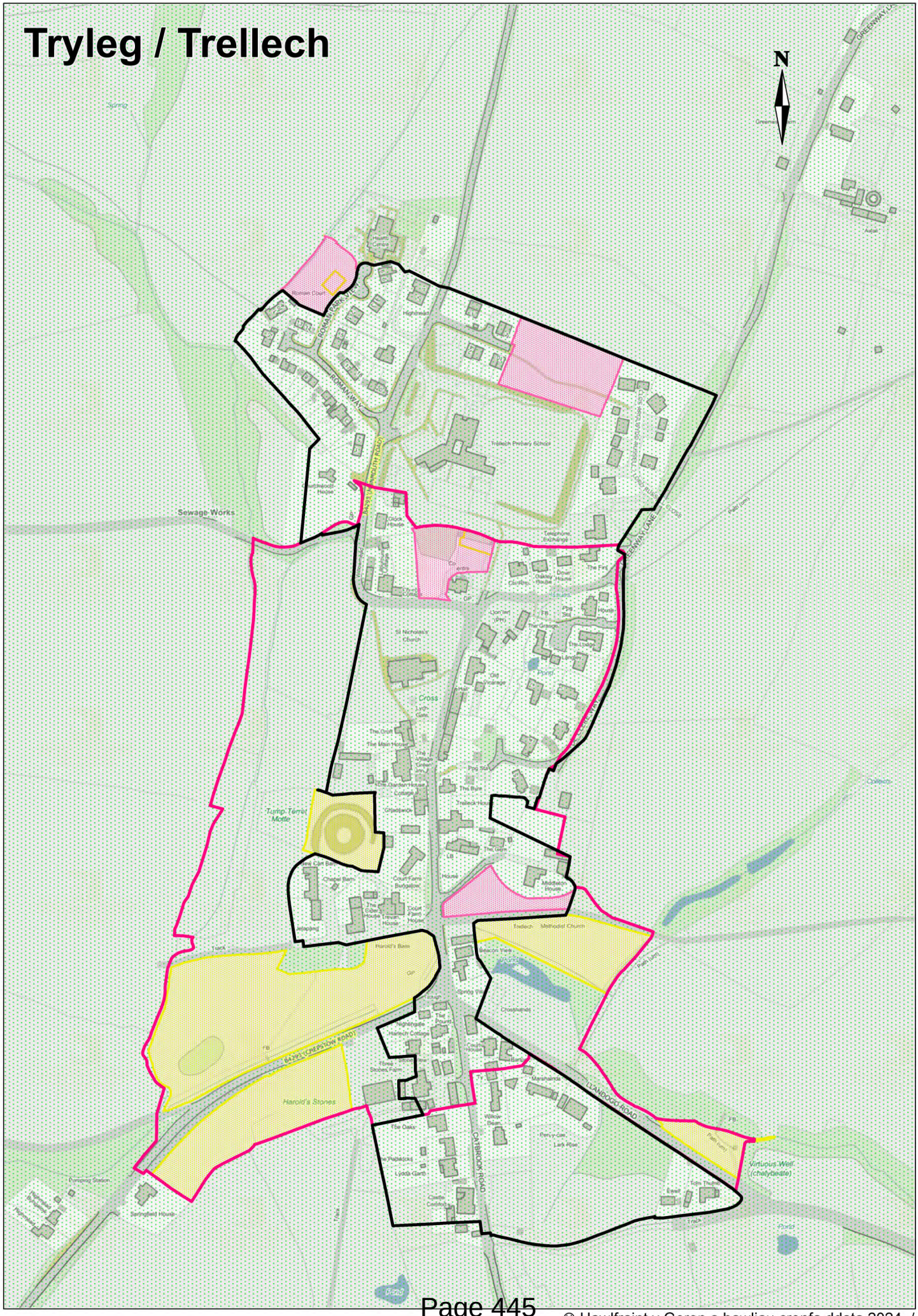
Tryleg / Trellech



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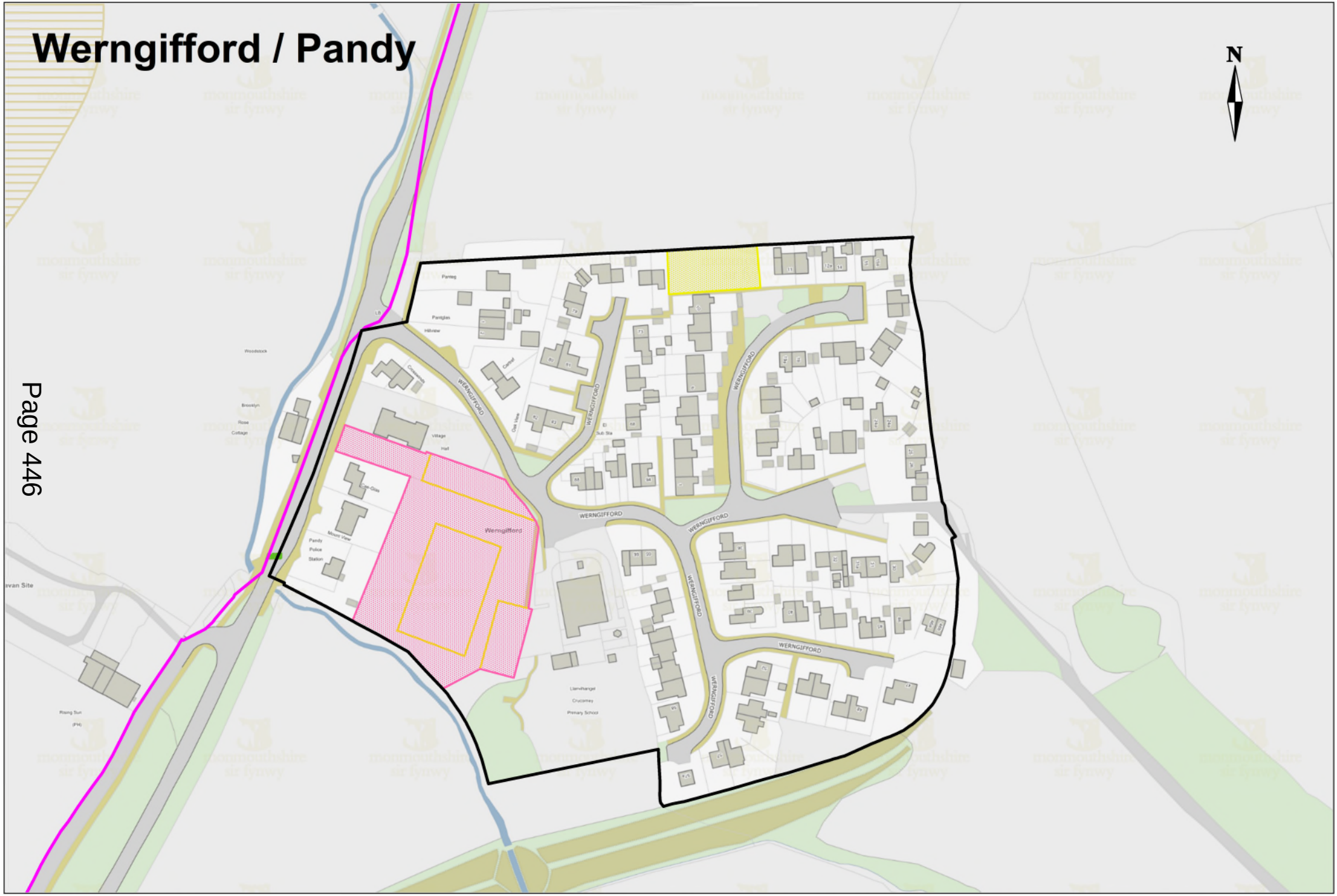
Werngifford / Pandy



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Monmouthshire Replacement Local Development Plan

Delivery Agreement

Revised October 2024

monmouthshire
sir fynwy

Monmouthshire County Council
Replacement Local Development Plan

Delivery Agreement

Revised October 2024

Planning Policy Service

Monmouthshire County Council

County Hall, Rhadyr, Usk, Monmouthshire NP15 1GA

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Email: Planningpolicy@monmouthshire.gov.uk

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1.0 Introduction

Revised Delivery Agreement October 2024

1.1 The Replacement Local Development Plan (RLDP) Delivery Agreement was first approved by Welsh Government on 14th May 2018. Since then, several challenges have arisen[1] meaning that progress on the preparation of the RLDP has been delayed and updates to the Delivery Agreement have been required.

1.2 The timetable in the latest Delivery Agreement (December 2022) set out that political reporting and subsequent public engagement/consultation on the Deposit RLDP would take place in Spring 2024. However, given the time needed to prepare the Deposit Plan (including the preparation of the evidence base), as well as the timing of the UK General Election, this stage of the process will now take place in Autumn 2024, with subsequent stages moved on accordingly. As this constitutes more than a three-month slippage to the Plan's timescale, there is a need to amend the Delivery Agreement timetable as set out in this document.

LDP Review

1.3 A full review of the Monmouthshire Local Development Plan 2011 – 2021 (adopted 27th February 2014) has been undertaken, the findings of which are set out in the LDP Review Report (March 2018). The Review Report provides an overview of the issues that have been considered as part of the full review process and subsequently identified any changes that are likely to be needed to the LDP, based on evidence. It concludes by recommending that the Council commences the preparation of a RLDP following the full revision procedure. The final Review Report was published alongside the Draft Delivery Agreement (May 2018). The Council has commenced preparation of the Replacement LDP which will cover the Plan period 2018-2033.

1.4 The adopted Monmouthshire Local Development Plan (February 2014) covers the period 2011-2021. The risks associated with the LDP expiry date legislation for the adopted LDP have dissipated following the publication of a letter from the Minister received in September 2020[2]. This clarified that the provisions in the Planning (Wales) Act 2015 relating to LDP expiry dates do not apply to LDPs adopted prior to that Act coming into force (4th January 2016). This means that our current LDP, adopted in February 2014, remains an extant development Plan for decision-making purposes until the RLDP is adopted. Although policies in the Adopted LDP may be superseded by more recent national policy or evidence after December 2021, the Minister's clarification provides much needed clarity to all stakeholders and removes a

[1] These challenges include the publication of updated Welsh Government 2018-based population projections, the Covid-19 pandemic, an objection from Welsh Government to the July 2021 Preferred Strategy, and phosphate water quality issues in the River Wye and River Usk catchment areas.

[2] Minister for Housing and Local Government Letter to Local Authority Leaders and Chief Executives National Park Authority Chief Executives 24th September 2020

considerable risk of having a policy vacuum. This clarification does not, however, change the urgent need for the Council to make timely progress on its RLDP and to get the new Plan adopted as soon as realistically possible to address our key issues to ensure a Plan-led system is in place.

Purpose of a Delivery Agreement

1.5 The RLDP will cover the 2018-2033 period. Preparation of a Delivery Agreement[3] is a key requirement in preparing a replacement Plan. This document provides details of the various Plan-making stages, the time each part of the process is likely to take, and the resources that the Council will commit to Plan preparation. It also sets out the way in which the Council proposes to involve the local community and other stakeholders in the preparation of the RLDP. The RLDP will be examined by an independent Inspector to test whether the Plan is sound and has been prepared in accordance with its Delivery Agreement.

1.6 The Delivery Agreement is split into two key parts:

- The **Timetable** for producing the RLDP. This provides a clear indication of when each stages of Plan preparation will take place. Definitive dates are provided up to the deposit stage with indicative dates for later stages. A project management approach will continue to be taken to ensure that the Plan is adequately resourced and delivered on time. The timetable is included in *Part 2* of this Revised Delivery Agreement and has been updated to reflect the delays incurred to the process, as above.

- The **Community Involvement Scheme** outlines the Authority's principles of community engagement; its approach in relation to who, how and when it intends to engage with the community and stakeholders, how it will respond to representations and how these representations will inform later stages of Plan preparation. This is included as *Part 3* of this Revised Delivery Agreement.

1.7 A glossary of terms can be found in Appendix 4.

Preparation of the Replacement LDP

1.8 In preparing the RLDP the Council will aim to achieve the following key outcomes[4]:

- Support sustainable development and quality places based around the National Sustainable Placemaking Outcomes, be aligned with national policy set out in Planning Policy Wales (PPW) and Future Wales: the National Plan 2040 and integrated with an SA/SEA/HRA, including Welsh language and the requirements of the Well-being of Future Generations Act 2015.
- Be based on and underpinned by early, effective and meaningful community involvement in order to understand and consider a wide range of views, with the

[3] Section 63 (1) Planning and Compulsory Purchase Act 2004 & Regulations 5 – 10 LDP (Wales) Regulations (as amended 2015)

[4] Welsh Government Development Plans Manual (Edition 3, March 2020).

aim of building a broad consensus on the spatial strategy, policies and proposals of the RLDP.

- Be based on a robust understanding of the role and function of the Monmouthshire area including the functional linkages to areas beyond our administrative boundaries.
- Be distinctive by having plans setting out clearly how Monmouthshire will develop and change, giving certainty for communities, developers and businesses.
- Be resilient to climate change, reflecting the Council's climate and nature emergency declaration and Community and Corporate Plan priority. We will adhere to the principles of Placemaking, the Sustainable Transport Hierarchy and the Energy Hierarchy as set out in PPW.
- Ensure the sustainable management of natural resources in accordance with the Environment (Wales) Act 2016 and other relevant legislation.
- Deliver what is intended through deliverable and viable plans, taking into account necessary infrastructure requirements, financial viability and other market factors.
- Be proactive and responsive, kept up-to-date and flexible to accommodate change.

1.9 The RLDP will be prepared with regard to a wide range of legislation, policies and other initiatives at the European, national, regional and local level. The Gwent PSB Well-Being Plan (GWBP) will be of particular importance at the local level. The GWBP relates to the economic, social, environmental and cultural well-being of the sub region and has clear links with the RLDP where it relates to land use planning.

Integrated Sustainability Appraisal (ISA) incorporating Strategic Environmental Assessment (SA/SEA)

1.10 An Integrated Sustainability Appraisal[5], (ISA) incorporating Strategic Environmental Assessment[6] (SEA), is a statutory requirement of LDP preparation in order to assess the environmental, social and economic implications of the Plan's strategy and policies. The ISA process fulfils the requirements and duties for Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA), Equalities Impact Assessment (EqIA), Health Impact Assessment (HIA), Welsh Language Impact Assessment (WLIA) and Well-being of Future Generations (WBFG) and is utilised to ensure that policies in the RLDP reflect sustainable development principles and take into account the significant effects of the Plan on the environment.

1.11 The Council will continue to adopt an integrated approach to the SA/SEA of the RLDP, ensuring that the Plan is internally consistent, with economic and social issues considered alongside other matters. The appraisal process will run concurrently with the Plan making process and forms an iterative part of plan preparation.

1.12 The ISA, incorporating the SEA, will be undertaken as follows:

[5] Section 62 (6) Planning and Compulsory Purchase Act 2004

[6] European Union Directive 2001/42/EC & Environmental Assessment of Plans and Programmes (Wales) Regulations 2004

- An Integrated Sustainability Appraisal Scoping Report identifies the existing sustainability issues in the Monmouthshire area and provides baseline information along with a review of plans, policies, programmes and strategies. The existing SA indicators and objectives will be revised and updated as necessary. A revised Sustainability Framework will be produced.
- An Initial Integrated Sustainability Appraisal Report (ISAR) predicts and evaluates the effects of the LDP options, spatial strategy and strategic policies on the social, environmental and economic objectives as set out in the Scoping Report. The Initial ISAR will be published at the same time as the Preferred Strategy and updated when the Deposit Plan is prepared.
- A Final Integrated Sustainability Appraisal Report will bring together all elements of the ISA and take into account the binding recommendations of the Planning Inspector. The Final ISAR will be published following receipt of the Inspector's Report.
- An Integrated Sustainability Appraisal Adoption Statement will be published to explain how the sustainability considerations and the Sustainability Assessment have been taken into consideration in the production of the RLDP.

Habitats Regulations Assessment (HRA)

1.13 The Habitats Directive[7] requires that land use plans, including LDPs, are subject to an additional Habitats Regulations Assessment where there are sites of European significance for nature conservation purposes. Monmouthshire contains a range of international nature conservation designated sites such as Special Areas of Conservation and a RAMSAR site. Habitats Regulations Assessment will be undertaken alongside ISA/SEA to ensure an integrated approach to assessment. It is intended that the process will again run concurrently with the Plan making process and form an iterative part of Plan preparation.

1.14 There are two stages of Habitats Regulation Assessment:
- Screening
- Habitats Regulations Assessment

Evidence Base Assessments

1.15 As outlined in each of the published Annual Monitoring Reports, and the Review Report, there is a need to update and undertake various evidence base assessments throughout the preparation of the RLDP which will include:

- Needs assessments in relation to population, housing, employment and retail
- Additional land allocations to meet the chosen growth strategy for the new Plan period
- Affordable Housing Viability Assessment

[7] 92/43/EC

- Local Housing Market Assessment Update
- Sustainable Settlement Assessment
- Employment Land Review and Regional Employment Study
- Amenity Open Space Survey
- Settlement Boundary Review
- Renewable Energy Assessment
- Infrastructure Plan
- Green Wedge Review
- Landscape Sensitivity Study Update

This is not a definitive list and additional evidence base update requirements may emerge as the replacement Plan progresses.

Well-being of Future Generations Act

1.16 The Well Being of Future Generations (Wales) Act (WBFG) gained Royal Assent in April 2015. The Act aims to make a difference to lives of people in Wales in relation to seven well-being goals and also sets out five ways of working. The seven well-being goals relate to; a prosperous Wales, a resilient Wales, a healthier Wales, a more equal Wales, a Wales of cohesive communities, a Wales of vibrant culture and Welsh language, and, a globally responsible Wales. The five ways of working are long-term, integration, involvement, collaboration and prevention. Given that sustainable development is the core underlying principle of the LDP (and SEA), there are clear associations between both the LDP and the WBFG Act. As a requirement of the Act a Well-being Plan (WBP) must be produced, which considers economic, social, environmental and cultural well-being and has clear links with the RLDP. Both the WBFG Act and the WBP will be considered fully throughout the preparation of the RLDP, which will follow the five ways of working.

Tests of Soundness

1.17 'Soundness' is an integral part of the LDP system and is an important principle by which it may be demonstrated as to whether the LDP shows good judgement and is able to be trusted. If the RLDP is found not to be sound then the Welsh Government could require the Council to take necessary action to remedy the situation. This may involve returning to the very early stages of Plan preparation thereby causing considerable delay in the preparation of the Plan.

1.18 The Council must submit the RLDP to the Welsh Government for examination. An independent Inspector is appointed by the Welsh Government to undertake this examination to determine whether the Plan is fundamentally sound. The Inspector will assess whether the preparation of the Plan has been undertaken in accordance with legal and regulatory procedural requirements, and complies with the Community

Involvement Scheme. The Inspector must also determine whether the Plan meets the three soundness tests[8]:

- **Test 1 – Does the Plan fit?** (i.e. is it clear that the RLDP is consistent with other Plans?)
- **Test 2 – Is the Plan appropriate?** (i.e. is the Plan appropriate for the area in the light of the evidence? Does it address the key issues? Is the vision and strategy positive and sufficiently aspirational?)
- **Test 3 – Will the Plan deliver?** (i.e. is it likely to be effective?)

1.19 The conclusions reached by the Inspector will be binding and, unless the Welsh Government intervenes, the Council must accept the changes required by the Inspector and adopt the RLDP.

[8] Development Plans Manual Edition 3 (Welsh Government, March 2020)

2.0 Timetable

2.1 The Council established a timetable in the original Delivery Agreement (May 2018) summarising the key stages in Plan preparation (Table 1), which while challenging, was considered to provide a realistic timeframe for preparation of the RLDP having regard to the resources available. In preparing the timetable, regard was had to the WG's expectation that a replacement Plan can be prepared in considerably less than 4 years, taking into account the resources available and the extent of changes required (Planning Policy Wales Edition 9, November 2016 provided the relevant guidance at that time). Moreover, it had regard to the fact that the current LDP was due to expire in December 2021 and there was a pressing need to maintain plan coverage. However, as noted above, a recent Ministerial letter has confirmed that the LDP end date legislation will not apply to those LDPs adopted prior to 4th January 2016 meaning that the Adopted LDP will remain the in force until the RLDP is adopted.

2.2 Work commenced at pace on the RLDP following the approval of the original Delivery Agreement in May 2018, however, since that time several challenges have arisen which have impacted on the progress of the RLDP. This includes the publication of updated Welsh Government 2018-based population projections, the Covid-19 pandemic, an objection from Welsh Government to the June 2021 Preferred Strategy, and phosphate water quality issues in the River Wye and River Usk catchment areas.

2.3 Following consultation on the revised Preferred Strategy in December 2022-January 2023, the Council has proceeded with the preparation of the Deposit Plan. However, given the scope of the evidence base and detailed work needed to prepare/inform the Deposit Plan, together with the timing of the UK General Election, the timetable for political reporting and subsequent consultation on the Deposit Plan set out in the December 2022 Delivery Agreement has slipped beyond the three-month allowance set by Welsh Government. Accordingly, there is a need to further amend the Delivery Agreement timetable as set out in this document. The revised RLDP timetable is set out in Table 1 and Appendix 2.

2.4 Table 1 is split into definitive and indicative stages:

- **Definitive Stages –** This part of the timetable provides information up to and inclusive of the statutory Deposit stage. The progress of the Plan over this period is under the direct control of the Council (subject to external risks) and therefore the revised target dates, while still challenging, are considered realistic and every effort will be made to adhere to these dates.
- **Indicative Stages –** This part of the timetable provides for the stages of Plan preparation beyond the statutory Deposit stage. These stages are increasingly dependent on a wide range of external factors (e.g. the number of representations received, number of examination hearing sessions, time taken to receive the Inspector's Report) over which the Council has limited control.

These dates will be reconsidered after reaching the Deposit stage when definitive timings for the remaining stages will be prepared.

Table 1 - Key Stages in the Preparation of the RLDP (Updated October 2024)

Key Stages	Timescale
Definitive	
Revised Delivery Agreement (October 2024)	October 2024
	Full Council – October 2024 Submission to Welsh Government for agreement – October 2024
Pre-Deposit Participation	June 2022 - November 2022
	Report to Council on revised draft Preferred Strategy – December 2022
Preferred Strategy (Pre-Deposit) Consultation.	December 2022
	Preferred Strategy – statutory 8-week consultation (December 2022 – January 2023) Informal consultation on the Candidate Site Register (December 2022 – January 2023) Report to Council with summary Consultation Report to endorse post-consultation updates to the Preferred Strategy (October 2023)
Statutory Deposit Plan Consultation	November – December 2024
	Report to Council on draft Deposit Plan – October 2024 Deposit Plan - 6-week statutory consultation November – December 2024 Analyse consultation responses and prepare consultation report – January – May 2025 Report to Council on any suggested/focused changes and submission of Deposit Plan to Welsh Government – June/July 2025
Stages	**Timescale**
Indicative	
Submission of RLDP to Welsh Government	July 2025
Independent Examination	September – November 2025
Inspector's Report	March /April 2026
Adoption	May 2026 (must be adopted within 8 weeks of receiving the Inspector's binding report)

2.5 A revised detailed project Plan outlining the timescale for each of the stages of Plan preparation is included in Appendix 2.

Resources

2.6 The Head of Placemaking will be responsible for the overall delivery of the RLDP, with the Planning Policy Manager responsible for the day-to-day project management. The Planning Policy Team will lead in the preparation and delivery of the RLDP with Member engagement and political reporting at appropriate stages. The existing staff resources are set out in Table 2 below, approximately 80% of officer time will be dedicated to the RLDP to account for day-to-day involvement in liaison with colleagues in development management and also to account for regional working. Additional time will be dedicated by the Head of Placemaking to ensure the efficient delivery of the RLDP. It will also be necessary to call upon staff resources from other internal departments to assist in undertaking various evidence base updates/assessments. This is likely to include officer support from: Development Management, Heritage, Housing, Highways, Business and Enterprise, Green Infrastructure, Education, Democratic Services and Legal Services.

Table 2 – Planning Policy Staff Resources

Officer Job Title	Number of posts
Planning Policy Manager	1
Principal Planning Policy Officer	1
Senior Planning Policy Officer	2
Planning Policy Officer	1
Trainee Planning Policy Officer (fixed term post)	1

2.7 The Council recognises that additional professional specialist services will also be required to progress and establish a robust evidence base to inform the RLDP. While it is anticipated that a considerable amount of evidence base work will be undertaken by MCC officers, predominately Planning Policy, the use of external consultants will be necessary, particularly in relation to highly technical/specialist elements of the evidence base. Financial resources have been secured accordingly.

2.8 The Delivery Agreement has been prepared on the basis of a Monmouthshire RLDP only. Work is, however, on-going on a regional basis and collaboration with neighbouring authorities will continue to be fundamental to the preparation of the RLDP, particularly with regard to a joint evidence base, where appropriate. The South East Wales Strategic Planning Group (SEWSPG) has progressed a set of regionally agreed methodologies for key topic areas to ensure a consistent evidence base throughout the Cardiff Capital Region. South East Wales Planning Officers Society (SEWPOS) and SEWSPG have also commissioned a range of evidence base studies to inform RLDPs. In addition, on a sub-regional basis Monmouthshire, Torfaen, Blaenau Gwent, Newport and Caerphilly Councils have jointly procured a number of joint

evidence base studies. Liaison also continues with our neighbours in England as they progress their Development Plans.

2.9 A sufficient budget is available to progress the RLDP to adoption within the proposed timetable. It is anticipated that this will cover expenditure relating to all elements of preparation of the RLDP and the Independent Examination.

Risk Management and Analysis

2.10 While the original timetable for preparation of the RLDP was considered to be realistic, it was acknowledged that it would also be challenging. It was recognised that there are a number of factors that could result in Plan preparation deviating from the proposed timetable. The original timetable allowed for flexibility through a degree of tolerance of up to 3 month delay, before a formal revision to the Delivery Agreement is required. Appendix 3 sets out a risk assessment including a number of potential issues that could cause difficulties in keeping to the proposed timetable, together with the Council's proposed approach to managing them.

2.11 The unavoidable delays to the Plan preparation process experienced as a consequence of the numerous challenges set out above has necessitated a further revision to the RLDP timetable, which has been updated to reflect a realistic timescale for further key stages of the RLDP process. The revised timetable identifies the RLDP being adopted in Spring 2026 and is set out in Appendix 2. The process continues to allow for a delay in the plan preparation timetable of up to 3 months before a further revision to the Delivery Agreement is required.

Supplementary Planning Guidance (SPG)

2.12 The RLDP will contain sufficient policies to provide the basis for determining planning applications. However, Supplementary Planning Guidance (SPG) has an important supporting role in providing more detailed or site-specific guidance on the way in which RLDP policies will be applied. While SPG does not form part of a development plan it should be derived from and be consistent with the relevant LDP. The SPG should also be clearly cross referenced to the policies and proposals it supplements.

2.13 Since the adoption of the current Adopted LDP, a total of nine Supplementary Planning Guidance documents and one Planning Advice Note have been prepared and adopted to support existing LDP policies. The SPG cover the following topic areas:

- Green Infrastructure, April 2015
- Conversion of Agricultural Buildings Design Guide SPG April, 2015
- LDP Policies H5 & H6 Replacement Dwellings in the Open Countryside and Extension of Rural Dwellings SPG, April 2015
- Affordable Housing SPG, July 2019
- Renewable Energy and Energy Efficiency SPG, March 2016
- Primary Shopping Frontages Supplementary Planning Guidance, April 2016
- Sustainable Tourism Accommodation SPG, November 2017

- Rural Conversions to Residential or Tourism Use, November 2017
- Infill Development SPG, November 2019
- Planning Advice Note – Archaeology, August 2020
- Conservation Area Appraisals (to date 18 appraisals have been approved as Supplementary Planning Guidance).

2.14 It is anticipated that many of the SPG topics listed above will continue to be necessary and relevant, and will be updated to support the RLDP, and/or the updated evidence base.

2.15 For example it is recognised that updated viability testing is essential to inform the RLDP which could result in changes to existing policy, particularly affordable housing. Accordingly, the Affordable Housing SPG will need to be revised to reflect such changes. It is anticipated that this will be revised alongside the preparation of the RLDP. It should nevertheless be noted that SPG to the RLDP cannot be formally adopted until after the Inspector's Report has been received and it is clear that there are no changes to the policy approach set out in the Replacement Plan. Of note, most new/additional SPG will not be prepared or consulted on in parallel with the RLDP, primarily due to the challenging timescales associated with Plan preparation.

Monitoring and Review

2.16 The Council will continue to monitor and regularly review progress of the RLDP against the requirements of the Delivery Agreement to ensure the timetable is being adhered to and the public engagement as set out in the CIS is being met. As noted above, the timetable allows for a marginal degree of flexibility, however, any significant amendments to the DA will require approval by the Council prior to Welsh Government agreement. The DA may need to be amended if the following circumstances, which are beyond the LPA's control, occur:

- Significant change to the resources available to undertake the preparation of the RLDP.
- Preparation of the RLDP falls behind schedule by more than 3 months at a key stage.
- Significant changes to European, UK or Welsh legislation directly affecting the RLDP preparation process.
- Any other change in circumstances that will materially affect the delivery of the RLDP in accordance with the DA.
- Significant changes to the Community Involvement Scheme.

2.17 Given the unavoidable delays incurred during the Plan preparation process to date (as detailed above), the Delivery Agreement timetable has been further revised to reflect a more realistic timescale for future key stages of the RLDP process.

2.18 An updated timetable will be submitted to the Welsh Government following the Deposit stage. This will provide certainty of the timescales for the remaining stages (i.e. replacing indicative stages with definitive stages).

3.0 Community Involvement Scheme

3.1 The Community Involvement Scheme sets out how the Council proposes to proactively involve the community and stakeholders in the preparation of the RLDP. While ultimately it is the Council that is responsible for the content of the RLDP, one of the aims of the LDP system is that Plan production is based on effective community involvement in order that a range of views can be considered as part of a process of building a wide consensus on the Plan's strategy and policies. The five ways of working prescribed by the Well-Being of Future Generations (Wales) Act are integral to the CIS, namely long-term, integration, involvement, collaboration and prevention. The CIS describes the ways in which the community can influence the RLDP at the different stages of the Plan preparation process.

3.2 Monmouthshire County Council's core purpose of becoming a zero-carbon county, supporting well-being, health and dignity for everyone at every stage of life[9] is intrinsically linked to land use Planning and is therefore key to the delivery of the RLDP. Accordingly, the CIS is based on Monmouthshire County Council's five values; openness, fairness, flexibility, teamwork and kindness.

***Openness**. We are open and honest. People have the chance to get involved in decisions that affect them, tell us what matters and do things for themselves/their communities. If we cannot do something to help, we'll say so; if it will take a while to get the answer we'll explain why; if we can't answer immediately we'll try to connect you to the people who can help – building trust and engagement is a key foundation.*

***Fairness.** We provide fair chances, to help people and communities thrive. If something does not seem fair, we will listen and help explain why. We will always try to treat everyone fairly and consistently. We cannot always make everyone happy, but will commit to listening and explaining why we did what we did.*

***Flexibility.** We will continue to change and be flexible to enable delivery of the most effective and efficient services. This means a genuine commitment to working with everyone to embrace new ways of working.*

***Teamwork.** We will work with you and our partners to support and inspire everyone 'fixers' or problem-solvers, but we will make the best of the ideas, assets and resources available to make sure we do the things that most positively impact our people and places.*

***Kindness:** We will show kindness to all those we work with putting the importance of relationships and the connections we have with one another at the heart of all interactions.*

[9] The Community and Corporate Plan 2022 sets out the Council's core purpose, principles, and priorities

3.3 Monmouthshire County Council is also committed to ensuring the ten national principles for public engagement in Wales are utilised. Public engagement in the preparation of the RLDP will take place in accordance with the guidelines set out in the CIS. The Council recognise that engagement must be designed to make a difference. The main objectives for involving the community in the RLDP preparation process can be identified as:

- To involve people at the earliest opportunity, in time to shape Plan preparation work
- That consultation takes place before decisions are made and that such decisions are made in an open and transparent manner
- To provide an accessible consultation process and adapt this as necessary to account for individual needs
- To encourage and enable everyone with the opportunity to be involved, if they so choose
- Adopt alternative approaches to ensure seldom heard groups are involved from the outset
- Draw on local knowledge to improve decision making and help the realistic implementation of decisions
- That the planning system should help implement the community's vision for the area
- To seek consensus and strengthen community involvement
- To engage as full a spectrum of the community as possible in strategic issues
- To provide two way dialogue by responding to and publishing comments received at formal consultation stages (Preferred Strategy and Deposit) in a report of consultation.

Welsh Language and Bilingual engagement

3.4 The Welsh Language Standards place a legal duty on Councils to make it easier for people to use services through the medium of Welsh. The Council has published a Welsh Language Strategy for 2022 - 2027; the requirements of both the corporate strategy and Welsh Language Standards will be maintained at each stage of the RLDP. Bilingual engagement will be carried out in the following ways:

- We welcome correspondence in both Welsh and English. Where correspondence is received in Welsh and a reply is necessary, this will be sent in Welsh.
- All comments forms, public notices (including site notices) and Easy Read documents will be bilingual. Stakeholders on the RLDP database will be sent RLDP correspondence in their preferred language.
- Any pages on the Replacement Local Development Plan website and social media posts will be bilingual.
- Any public meetings will be conducted bilingually where a request has been made ahead of time. Prior notification is required in order to provide a translation service.

- Draft RLDP documents can be made available in Welsh if requested. The Adopted RLDP will be available in both Welsh and English format.

How will we involve you?

3.5 We will seek to publicise the RLDP process at every stage and reach as much of the community as possible, as well as other stakeholders, to advise people about the RLDP and how they can get involved. This will be done by:

- Direct contact with statutory consultees and those stakeholders who have asked to be included on the RLDP database (1000+ contacts) (contact and language preference are as indicated by the stakeholder through consultation).
- Through use of social media platforms including via Monmouthshire County Council's X and Facebook accounts**.**
- Engagement with Members through specific workshops, Member drop-in sessions and in reports to appropriate Council meetings.
- Engagement with Town and Community Councils
- All RLDP information and documents will be made available on the Council's website, which will be updated regularly.
- Deposit of documents at the Council's headquarters and Community Hubs where possible[10].
- Press releases for the local media, where appropriate.
- Producing Easy Read summary documents for key stages of the RLDP process.
- Public information exhibitions, engagement sessions ('drop-in sessions') and meetings in accessible and neutral locations.
- Virtual engagement and consultation via web based technological tools.
- Site notices will be displayed regarding proposed land allocations at Deposit stage and letters will be sent to adjacent properties (excluding Candidate Sites submitted as these relate to submissions for consideration rather than proposals).

Who will we involve?

Individuals who have registered an interest through the RLDP Database

3.6 A database has been maintained to include members of the public, interested persons and any individual organisations who have requested to be kept informed at each stage of the RLDP process. The primary purpose of this database is to allow for those who are not included on the Welsh Government list of consultees for Local Development Plans to be involved and informed throughout the RLDP process. Anyone can request for their details to be included on the database. Anyone who makes representations at any of the stages of RLDP process will be automatically added to the database in order for them to receive updates on progress and allow

[10] If some of these venues are temporarily closed during a consultation period we will endeavour to identify alternative outlets and communicate this to all stakeholders via the means set out here.

them to be adequately informed of further opportunities to participate at a later date. It should be noted that the General Data Protection Regulation (GDPR) came into force in May 2018. By commenting on the RLDP, individuals and stakeholders give their consent for their details to be held by the Council throughout the RLDP process and for a period of 6 years following adoption.

3.7 If you wish for your details to be added to the RLDP database, please contact the Planning Policy Team by email, phone or in writing using the contact details as set out in paragraph 3.28.

County Councillors

3.8 It is recognised that the involvement of Members of Monmouthshire County Council throughout the RLDP preparation will be of key importance. Members have a unique position as not only do they represent the communities within their individual ward, they also represent public interest and are involved in decisions for the wider benefit of the County as a whole. Accordingly, Members will play an essential role in the RLDP process by providing information to local residents, informing us of issues/opportunities within their local area and more fundamentally making decisions on matters affecting the Monmouthshire area as a whole.

3.9 The Cabinet Member for Planning and Economic Development, Deputy Leader has responsibility for Planning policy, including the RLDP. Liaison with the Cabinet Member and all other Members is essential throughout the process. All-Member workshops will be held when deemed necessary, particularly at key stages of the RLDP including but not limited to; the Growth and Spatial Options, Preferred Strategy, Deposit RLDP and at Adoption. Topic-specific Member workshops will also be held throughout the Plan preparation process. Key stages of Plan preparation will go to the Place Scrutiny Committee for pre-decision scrutiny. Members will be fully informed throughout the process and notified prior to every participation/consultation stage.

Town and Community Councils

3.10 Town and Community Councils also play a key role in disseminating information to the residents within their area on matters of local importance and will be a key link to communities across Monmouthshire. Town and Community Councils will be consulted at every stage of the RLDP process and through their individual communication methods will help raise awareness of the RLDP to local communities. They also have the ability to provide up to date local information, opinions on any proposals within their areas and more importantly are able to provide detail of any land use based aspirations they have for their community.

Partnership Groups

3.11 Existing partnership groups are seen as an important means of engaging the wider community in the preparation of the RLDP, particularly in the early stages of public participation when structured discussion is desirable.

3.12 Liaison with the Gwent Public Service Board and partners will be of particular importance to ensure the RLDP aligns with the Gwent PSB Well-being Plan. We will also work closely with the Council's Community Development Team who operate as a bridging mechanism between partners, Town & Community Councils and the community. The Community Development Team is also central to the delivery of the PSB Gwent Wellbeing Plan.

Members of the Public, Businesses, Land Owners, Developers and Agents

3.13 As outlined previously extensive engagement will be undertaken at each key stage of the RLDP process. Efforts will be made to engage with the business community at an early stage which could be achieved through liaison with the individual Chambers of Commerce across the County. We will also engage with planning agents who are regular customers of Monmouthshire's Planning Service. As noted above, anyone can request for their details to be included on the RLDP database. Landowners, agents and prospective developers who wish to put land forward to be considered for development will therefore also be included on the RLDP database.

3.14 The Candidate Site process provided the opportunity for those who have an interest in land to submit sites to be considered for development. A common methodology has been established across the South East Wales region for local planning authorities to utilise for their respective RLDPs. Reflecting this, we adopted a two-stage Call for Candidate Sites. The Initial Call for Candidate Sites took place over a 16-week period from the 30th July 2018 to 19th November 2018. The Second Call for Candidate Sites took between 5th July 2021 to 31st August 2021, alongside consultation on the 2021 Preferred Strategy. The dates for these calls for site were advertised extensively using the methods set out above. This ensured submissions were made at the appropriate time.

Additional Consultation Bodies

3.15 Appendix 1 provides a list of the specific and general consultation bodies along with UK Government departments and other consultees. The specific consultees[11] comprise of the Welsh Government and those bodies with specific functions that apply to the revised Plan area, for example the Aneurin Bevan Health Board who cover the Monmouthshire area and Dŵr Cymru Welsh Water, the local water undertaker. The Authority must also consult UK Government Departments where aspects of the Plan appear to affect their interests. These consultation bodies will be engaged throughout the RLDP process at each of the formal stages and informally, as appropriate.

[11] As defined in LDP Regulation 2. Full list provided in Appendix 1.

Seldom Heard Groups

3.16 Seldom heard groups are those who have not traditionally taken part or been included in the Plan preparation process. Additional effort will therefore be required to ensure these groups are engaged in the RLDP process. A flexible approach will need to be undertaken in relation to engagement with these groups, albeit within the parameters of the specified participation/consultation periods. Engagement with these groups may be achieved by using existing partnerships and groups wherever possible. It is nevertheless recognised that the very principle of a seldom heard group is that they may not be involved in existing groups and that this may not therefore always be achievable. Trusted intermediaries will also be used, as appropriate, in order to gain the views of particular groups of people who do not have the confidence to engage directly in the process.

3.17 The following groups are identified as not having been sufficiently engaged in Plan preparation previously and will subsequently be actively encouraged to participate in the RLDP process:

- Young People – Monmouthshire Youth Council[12] will be invited to participate as appropriate in the RLDP process. This will ensure the voices of young people are heard and enable young people to share their views on a wide range of issues that they consider important to them and their local area.
- Disabled People – we will seek to engage with an appropriate stakeholder group(s) at relevant stages, in order to gain the views of those living with disabilities in Monmouthshire. We understand that the Access for All forum has been disbanded but we will seek input from relevant stakeholders to offer an opportunity for people with disabilities to influence the policies and decisions that affect them.
- Gypsy and Travellers – we will seek to engage with an appropriate stakeholder group(s) at relevant stages to ensure the Gypsy and Traveller community are engaged. Work has been undertaken via the People Scrutiny Committee and led by the Council's Housing team to identify sites for inclusion in the RLDP to meet the County's identified site need. This work includes Gypsy and Traveller community representatives.

3.18 In addition to the above groups, there are other seldom heard voices who are considered to have been under-represented previously in LDP preparation. This includes (but is not exclusive to) those seeking affordable housing in the County, small house-builders and small and medium-sized enterprises. Accordingly, we will endeavour to reach out to these groups by utilising existing mutual points of contact wherever possible.

[12] Youth Workers and pupils from King Henry VIII School, Caldicot School, Chepstow School and Monmouth School

What we expect from you

3.19 In order to ensure any comments and representations on the RLDP are considered, they must be submitted within the prescribed timescales. The Delivery Agreement sets out the timetable of relevant stages and provides a guideline of when we will seek your involvement. This will ensure that individual views are considered and taken into account throughout the RLDP preparation process.

3.20 It is also of **importance that stakeholders notify the Planning Policy team should their contact details change during the RLDP process** in order for us to keep them fully informed of progress. With regard to Candidate Sites, it is noted that land ownership changes may also occur during the process and it is imperative that these are communicated to the Planning Policy team in order to ensure progress is not delayed.

Building Consensus

3.21 The Council will seek to build consensus through the various engagement and consultation methods set out within the CIS. Consensus building can only be achieved if the community and other interested parties are kept fully informed and effectively engaged throughout the preparation of the RLDP, which will be of particular importance in the early stages of Plan preparation. Elected Member support is essential in achieving this. It is nevertheless recognised that there will be occasions where consensus cannot be achieved and a difference in opinion between certain parties occurs. A clear audit trail of decisions will be maintained in order to ensure that there is transparency in the decision making process, and, to provide assurances to those that disagree that the decisions have been made in an informed and balanced way. However, decisions made will not be revisited via subsequent consultation opportunities, so participants are requested to focus their input on the matter being considered at that stage.

Late representations

3.22 Responses are required by the specified deadline of the specific consultation period in order for them to be considered. Any late comments/representations will not be logged as 'duly made' as they were not made in accordance with the published timescales. There may be exceptional circumstances where a representation is submitted late and it will be at the Council's discretion as to whether such late representations can be accepted. Evidence will be required to highlight why the representation was delayed and that a genuine attempt was made to submit within the prescribed deadline. The timescale to produce the RLDP continues to be challenging, the acceptance of late representations could result in further delay which would not be acceptable.

Availability of Documents

3.23 The RLDP documents will be made available at each of the relevant stages. All documents will be available electronically on the Planning Policy pages of the Council's

website at http://www.monmouthshire.gov.uk/Planning-policy. Public access computers are available at our Community Hubs listed below.

3.24 In addition to online availability, key documents will also be available in paper copies in the following locations:

- Planning Reception, Monmouthshire County Council, County Hall, The Rhadyr, Usk, NP15 1GA (open to the public Monday to Thursday)
- Abergavenny Community Hub, Town Hall, Cross Street, Abergavenny, NP7 5EU
- Caldicot Community Hub, Woodstock Way, Caldicot, NP26 5DB
- Chepstow Community Hub, Manor Way, Chepstow, NP16 5HZ
- Monmouth Community Hub, Rolls Hall, Whitecross Street, Monmouth, NP15 3BY
- Usk Community Hub, 35 Maryport Street, Usk, NP15 1AE
- Gilwern Library, Common Road, Gilwern, NP7 0DS

3.25 Other than in exceptional circumstances, paper copies of documents will not be sent out during the RLDP process as they will be made publicly available in the locations listed above, as well as being made available electronically. Exceptional circumstances will be assessed on a case by case basis depending on the specific needs of the relevant individual. If one of the buildings listed above is temporarily closed during a consultation period, we will endeavour to identify alternative outlets and communicate this to all stakeholders. Where alternative outlets are not available, we will seek to provide information to stakeholders via electronic means.

Timetable and proposed Methods of Engagement

3.26 The following table sets out the detailed timetable for community engagement and the proposed engagement methods for the key stages in the RLDP preparation process. The list is not exhaustive and may be adapted to ensure the community and stakeholders are suitably involved at each stage. The proposed methods of engagement will vary dependent on the stage of Plan preparation, subject matter, preference of those involved and the resources available at the time, recognising that the proposed timetable and methods should not hinder Plan preparation.

3.27 Further details on the precise nature of the consultation and engagement arrangements for future key consultation stages will be detailed on the Planning Policy website and in future correspondence to all those on the RDLP database prior to the start of any consultation process. A mixture of public events and virtual engagement mechanisms will be utilised throughout the remainder of the Plan preparation process.

Table 3 - Community Involvement Timetable and Proposed Methods of Engagement

Definitive Stage: Delivery Agreement						
Summary of key steps	**ISA/SEA & HRA**	**Who will be involved**	**Methods of engagement**	**Outcome**	**Type of reporting required**	**LDP Regulations**
• Prepare timetable for the RLDP process • Preparation of Community Involvement Scheme • Consultation on Draft DA • Submission of Final DA to Welsh Government following Council approval	• Provide details of integration of the Integrated SA (ISA)/SEA process in the timetable	• Internal Consultees • Members • Specific consultation bodies	• Consultation with Members via Council Meeting • Consultation with Democratic Services Committee • Targeted consultation with specific consultation bodies via direct correspondence (in relation to the	• A realistic timeframe for preparation of the RLDP • Details of risk management • Community involvement proposals specified • Collaborative working • Formal commencement of the RLDP	Full Council - Revised Delivery Agreement (5) (October 2024)	The Town and Country Planning (Local Development Plan) (Wales) Regulations 9 & 10 (2004) and Regulation 2 (5) (2015)

			original Delivery Agreement) • Information by letter or email			
Definitive Stage: Pre-Deposit Participation						
Summary of key steps	**ISA/SEA & HRA**	**Who will be involved**	**Methods of engagement**	**Outcome**	**Type of reporting required**	**LDP Regulations**
• Review and update existing LDP evidence base • Initial Call for Candidate Sites (including call for brownfield sites) – for a 16 week period • Engage with consultees to develop consensus on vision, issues and objectives. • Engage with consultees to develop consensus on options, including, growth levels and spatial distribution • Obtain Member approval on Preferred Strategy	• Integrated Sustainability Appraisal Scoping Report Update baseline information, indicators and objectives. • Produce revised sustainability framework. • HRA Screening of pre-deposit proposals for likely significant effects (stage 1).	• Internal Consultees • Members • Specific & General consultation bodies (Including Aneurin Bevan Health Board) • Other consultees (including Public Service Board) • Seldom heard groups • Town and Community Councils • All others on RLDP database	• Drop-in sessions, exhibitions and meetings as appropriate. • Virtual engagement and consultation via web based means such as MS Teams. • Engage with Members through workshops and reports to Council meetings. • Publication of each participation/ consultation stage on Council's website • Social media platforms via Planning policy and corporate accounts as appropriate • Press Release • Involve relevant community groups.	• Awareness raising of RLDP • Involvement of those who do not normally participate • Seek consensus on vision, issues and objectives • Collaborative working • Seek consensus on options, including, growth levels and distribution • Receipt of Candidate Sites • Draft SA/SEA Scoping Report • Draft Preferred Strategy	Full Council – proposal for progressing the RLDP, September 2022 Full Council to report on draft Preferred Strategy – May 2021. Full Council – Draft Preferred Strategy endorsement for consultation and engagement, December 2022 Log details of involvement for inclusion within Initial Report of Consultation.	The Town and Country Planning (Local Development Plan) (Wales) Regulation 14 (2004) and Regulation 2 (10) (2015)

			• Information by letter or email as appropriate • Preparation of Easy Read Summary document			
Definitive Stage: Pre-Deposit Consultation - Preferred Strategy and Initial Integrated Sustainability Appraisal Report (ISAR)						
Summary of key steps	**ISA/SEA & HRA**	**Who will be involved**	**Methods of engagement**	**Outcome**	**Type of reporting required**	**LDP Regulations**
•Formal consultation on Preferred Strategy •Formal consultation on ISAR and HRA •Further Call for Candidate Sites/Request for submission of detailed site information for those sites submitted during the initial candidate site call that are compatible with the Preferred Strategy •Publication of Candidate Sites Register •Preparation of Initial Report of Consultation providing feedback and comments on representations received (to be reported alongside the Deposit Plan).	• Formal consultation on ISAR and HRA • HRA of Deposit Plan. Revisit HRA Screening to determine whether the policies and proposals have potential to lead to likely significant effects, beyond those considered in Stage 1 screening.	• Internal Consultees • Members • Specific & General consultation bodies • Other consultees • Seldom heard groups where possible • Town and Community Councils • All others on RLDP database	• Engage with Members through workshops and reports to Council meetings. • Public engagement sessions, exhibitions and meetings as appropriate. • Virtual engagement and consultation via web based means such as MS Teams. • Publication of each consultation stage on Council's website • Social media platforms via Planning policy and corporate accounts as appropriate • Press Release • Involve relevant community groups.	• Preferred Strategy • Initial Integrated Sustainability Appraisal Report • Candidate Site Register • Draft Deposit Plan	Full Council - Deposit Plan for endorsement for consultation and engagement, October 2024 Details of responses received on Preferred Strategy to be incorporated into Initial Report of Consultation (to be reported alongside the Deposit Plan).	The Town and Country Planning (Local Development Plan) (Wales) Regulations 15 & 16 (2004) and Regulation 16a (2015)

• Preparation of Deposit RLDP • Obtain Member approval on Deposit RLDP			• Information by letter or email as appropriate • Preparation of Easy Read Summary document			
Definitive Stage: Deposit Consultation - Deposit Plan, Sustainability Appraisal Report (SAR) and Habitats Regulations Assessment (HRA)						
Summary of key steps	**SA/SEA & HRA**	**Who will be involved**	**Methods of engagement**	**Outcome**	**Type of reporting required**	**LDP Regulations**
• Deposit of RLDP for public inspection • Formal consultation on Deposit RLDP, ISAR, HRA and any relevant supporting documents • Preparation of Report of Consultation providing feedback and comments on representations received (post Deposit consultation)	• Formal consultation on ISAR • Formal consultation on HRA	• Internal Consultees • Members • Specific & General consultation bodies • Other consultees • Seldom heard groups where possible • Town and Community Councils • All others on RLDP database	• Engage with Members through workshops and reports to Council meetings. • Public engagement sessions, exhibitions and meetings as appropriate. • Virtual engagement and consultation via web based technological tools such as webinars. • Publication of each consultation stage on Council's website • Social media platforms via Planning policy and corporate accounts as appropriate • Press Release • Update relevant community groups	• Deposit Plan • Final Sustainability Appraisal Report • Habitats Regulations Assessment • Representations and comments on Deposit Plan, SA/SEA, HRA to be included in Report of Consultation	Details of responses received to be incorporated into Report of Consultation.	The Town and Country Planning (Local Development Plan) (Wales) Regulations 17, 18 & 19 (2004)

			• Information by letter or email as appropriate • Preparation of Easy Read Summary document			
Indicative Stage: Submission of RLDP to Welsh Government						
Summary of key steps	**SA/SEA & HRA**	**Who will be involved**	**Methods of engagement**	**Outcome**	**Type of reporting required**	**LDP Regulations**
• Consider any representations made on Deposit proposals and update Deposit Plan & Report of Consultation accordingly • Potential Focused Changes consultation • Submit Deposit RLDP, Report of Consultation, Integrated Sustainability Appraisal Report (ISAR), Community Involvement Scheme and any relevant supporting documents (including the evidence base) to the Welsh Government and PEDW.	• Consider any implications of representations on ISAR & HRA • Submit ISAR • Submit HRA	• Members • Internal Consultees • Specific & General consultation bodies • Other consultees • Town and Community Councils • All others on RLDP database	• Notify Members via email • Publication on Council's website • Social media platforms via Planning policy and corporate accounts as appropriate • Press Release • Information by letter or email as appropriate • Provide copies of documents in the following locations: County Hall and Community Hubs	• Submission of Deposit RLDP and supporting documents to Welsh Government for formal examination	Full Council to report on responses received on Deposit Plan, any suggested/ focused changes and to seek endorsement for submission – July 2025	The Town and Country Planning (Local Development Plan) (Wales) Regulation 22 (2004) and Regulation 2 (17) (2015)
Indicative Stage: Independent Examination						

Summary of key steps	SA/SEA & HRA	Who will be involved	Methods of engagement	Outcome	Type of reporting required	LDP Regulations
• Publish details of Hearing Sessions and notify all interested parties specifying dates and location • Seek common ground with objectors to focus hearing sessions • Update Matters Arising Changes (MACs) as appropriate • Consult on Matters Arising Changes	• Appraise any MACs utilising the ISA/SEA as appropriate • Appraise any MACs utilising the HRA as appropriate	• Members • Internal Consultees • Specific & General consultation bodies • Other consultees • Town and Community Councils • All others on RLDP database	• Notify Members via email • Publication on Council's website • Social media platforms via Planning policy and corporate account as appropriate • Press Release • Information by letter or email as appropriate	• Ensure Examination is open to all who wish to observe	Statements of common ground, as necessary	The Town and Country Planning (Local Development Plan) (Wales) Regulation 23 (2004)
Indicative Stage: Inspector's Report						
Summary of key steps	**SA/SEA & HRA**	**Who will be involved**	**Methods of engagement**	**Outcome**	**Type of reporting required**	**LDP Regulations**
• Publish Inspector's Report following receipt (within prescribed 8 week period) • Inform interested parties of receipt and publication of Inspector's Report		• Members • Internal Consultees • Specific & General consultation bodies • Other consultees	• Notify Members via email • Publication on Council's website • Social media platforms via Planning policy and corporate accounts as appropriate • Press Release	• Binding Inspector's Report	None	The Town and Country Planning (Local Development Plan) (Wales) Regulation 24 (2004)

		• Town and Community Councils • All others on RLDP database	• Information by letter or email as appropriate • Provide copy of Inspectors Report in the following locations: County Hall and Community Hubs			
Indicative Stage: Adoption						
Summary of key steps	**SA/SEA & HRA**	**Who will be involved**	**Methods of engagement**	**Outcome**	**Type of reporting required**	**LDP Regulations**
•Obtain Member approval to formally adopt •Inform all on RLDP database of adoption of the RLDP •Produce adoption statement •Produce the adopted RLDP bilingually	• Publish ISA Report • Publish HRA Report	• Members • Internal Consultees • Specific & General consultation bodies • Other consultees • Town and Community Councils • All others on RLDP database	• Engage with Members via an all Member Workshop and Council Meeting • Once adopted publication on Council's website • Once adopted, notification via social media platforms via Planning policy and corporate account as appropriate • Once adopted, Press Release will be published • Once adopted, notification via letter or email • Once adopted, provide copy of Adopted LDP in	• Formal adoption of the RLDP	Full Council prior to formal Adoption – Spring 2026	The Town and Country Planning (Local Development Plan) (Wales) Regulation 25 (2004) and 2(19) (2015)

			the following locations: County Hall, Libraries and Community Hubs			

Contact details

3.28 You can contact the Planning policy team using any of the following methods:

Email: Planningpolicy@monmouthshire.gov.uk
Telephone: 01633 644429

Post:
Planning Policy
Monmouthshire County Council
County Hall
The Rhadyr
Usk
NP15 1GA

Appendix 1 – List of Consultation Bodies

The Council will consult the following specific consultation bodies at all stages in the preparation of the RLDP.

Specific Consultation Bodies[13] (including UK Government Departments):

- Welsh Government (Planning division will co-ordinate consultations)
- Natural Resources Wales
- Network Rail
- Office of Secretary of State for Wales
- Telecommunication Operators - EE, Vodaphone and O2, Openreach, Virgin Media
- Aneurin Bevan Health Board
- Gas and Electricity Licencees - National Grid, Wales & West Utilities
- Sewerage and Water undertakers – Dŵr Cymru Welsh Water
- Department for Transport (including Secretary of State for functions previously exercised by the Strategic Rail Authority)
- UK Government Departments- Department of Business, Energy and Industrial Strategy
- Home Office
- Ministry of Defence

Neighbouring local authorities:

- Blaenau Gwent County Borough Council
- Bannua Brycheiniog National Park Authority
- Bristol City Council
- Cardiff Capital Region and, once established, the Corporate Joint Committees
- Forest of Dean District Council
- Gloucestershire County Council
- Herefordshire County Council
- Newport City Council
- Powys County Council
- South Gloucestershire Council
- Torfaen County Borough Council

Town and Community Councils in the Monmouthshire area:

- Abergavenny Town Council
- Caerwent Community Council
- Caldicot Town Council
- Chepstow Town Council
- Crucorney Community Council
- Devauden Community Council
- Gobion Fawr Community Council
- Goetre Fawr Community Council
- Grosmont Community Council
- Llanarth Fawr Community Council
- Llanbadoc Community Council

[13] As defined in LDP Regulation 2.

- Llanelly Community Council
- Llanfoist Fawr Community Council
- Llangybi Fawr Community Council
- Llantilio Pertholey Community Council
- Llantrisant Fawr Community Council
- Magor with Undy Town Council
- Mathern Community Council
- Mitchel Troy United Community Council
- Monmouth Town Council
- Portskewett Community Council
- Raglan Community Council
- Rogiet Community Council
- Shirenewton Community Council
- Skenfrith Community Council
- St Arvans Community Council
- Trellech United Community Council
- Usk Town Council
- Whitecastle Community Council
- Wye Valley Community Council

General Consultation Bodies

The Council will consult the following general consultation bodies, where appropriate, in accordance with this Delivery Agreement. This list is not exhaustive and may be added to as appropriate:

(i) Voluntary bodies whose activities benefit any part of the authority's area, including:

- Age Concern Gwent
- Sight Cymru (formerly known as Gwent Association for the Blind and Sight Support)
- Gwent Association of Voluntary Organisations Monmouthshire (GAVO)
- Gwent Wildlife Trust
- Royal Voluntary Service (RVS)

(ii) Bodies representing the interests of different racial, ethnic or national groups in the authority's area, including:

- Citizen's Advice Cymru
- Ethnic Minority Foundation
- Friends, Families and Travellers
- Travelling Ahead TGP Cymru

(iii) Bodies which represent the interests of different religious groups in the authority's area, including.

- The Representative Body of the Church in Wales

(iv) Bodies which represent the interests of disabled persons in the authority's area.

- Downs Syndrome Association

- Sight Cymru (formerly known as Gwent Association for the Blind and Sight Support)
- Mencap Cymru
- Mind Cymru
- Royal National Institute for Deaf People
- Wales Council for Deaf People
- Wales Council for the Blind
- Disability Wales

(v) Bodies which represent the interests of persons carrying on business in the authority's area, including.

- Abergavenny Community Enterprise Partnership
- Renewable UK (formerly known as British Wind Energy Association)
- Confederation of British Industry (Wales)
- Homemakers Community Recycling
- South East Wales Energy Agency
- Viridor Waste Management

(vi) Bodies which represent the interests of Welsh culture in the authority's area, including.

- Cadw
- Glamorgan Gwent Archaeological Trust Ltd
- Royal Commission on Ancient and Historic Monuments
- Mentrau Iaith Cymru

Other Consultees

The Council will consult the following other consultees, where appropriate, in accordance with the Delivery Agreement. This list is not exhaustive and may be added to as appropriate:

- Abergavenny Local History Society
- Abergavenny Transition Town
- Arriva Trains Wales
- British Aggregates Association
- British Geological Survey
- Business Wales (South Wales Regional Centre)
- Campaign for Real Ale (Camra)
- Campaign for the Protection of Rural Wales (CPRW)
- Caldicot Town Team
- Cardiff Capital Region City Deal
- Chambers of Trade & Commerce – Abergavenny, Chepstow, Monmouth and Usk
- Charter Housing Association
- Chartered Institution of Waste Management Wales
- Chepstow Society
- Civic Societies – Abergavenny & District, Monmouth and Usk
- Community Land Advisory Service Cymru (CLAS)
- Country Landowners and Business Association Cymru (CLA)

- Design Commission for Wales
- Disability Advice Project
- Disability Rights Commission Wales
- Disability Wales
- Disabled Persons Transport Advisory Committee
- Energy Saving Trust Wales
- Farmers Union of Wales (FUW)
- Federation of Master Builders Cymru
- Federation of Small Businesses in Wales
- Fields in Trust
- Friends of the Earth – Abergavenny & Crickhowell and Chepstow
- Gwent Badger Group
- Gwent Police
- Gwent Young Farmers Clubs
- Health and Safety Executive (Wales)
- Home Builders Federation
- Institute of Directors Wales
- Joint Council for Wales
- Llanarth Estate
- Llangybi Estate
- Llanover and Coldbrook Estate
- Logistics UK (formerly known as the Freight Transport Association)
- Member of Parliament for Monmouth
- Member of Parliament for Newport East
- Member of Senedd for Monmouth
- Member of Senedd for Newport East
- Magor with Undy Sports and Leisure Association
- Mineral Products Association
- Monmouth Archaeological Society
- Monmouth, Brecon and Abergavenny Canals Trust
- National Air Traffic Services
- National Farmers Union Cymru (NFU)
- National Trust
- National Health Service (NHS) Wales
- Newport Harbour Commissioners
- One Voice Wales
- Open Spaces Society
- Planning Aid Wales
- POBL (formerly known as Charter Housing Association)
- Pontypool Park Estate Office
- Public Health Wales
- Rail Freight Group
- Ramblers Cymru
- RSPB Cymru

- Rural Housing Enabler
- Shelter Cymru
- Society for the Protection of Ancient Buildings
- South Wales Fire and Rescue Service
- Sports Council for Wales
- Sustrans Cymru
- The Canal and River Trust
- The Chepstow Society
- The Coal Authority
- The National Library of Wales
- PEDW
- The Theatres Trust
- Transition Chepstow
- Transition Monmouth
- Transport for Wales (TfW)
- Wales Co-operative Centre
- Wales Council for Voluntary Action (WCVA)
- WEA Cymru (Adult Learning Wales)
- Wales Environment Link
- Welsh Environmental Services Association
- Welsh Historic Gardens Trust
- Welsh Language Commissioner
- Woodland Trust Wales (Coed Cadw)
- Wye Valley National Landscape (AONB)
- Wye Valley Society

Appendix 2 – Revised RLDP Timetable (October 2024)

Key Stage Revised Date

Key Stage - Definitive	2021												2022												2023												2024												2025												2026											
	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D
Delivery Agreement (DA)																																																																									
Preparation of Revised DA																																																																									
Political Reporting																																																																									
Submission to WG for agreement																																																																								
Update Evidence Base																																																																								
Review Evidence Base																																																																								
ISA: Review/Update ISA baseline and ISA framework - Update																																																																							
Pre-Deposit Participation																																																																							

Key Stage - Definitive	2021												2022												2023												2024												2025												2026											
	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D
Candidate Sites - Initial Call and Filter - July - December 2018																																																																								
Identification & assessment of vision, issues and objectives - Updated 2021																																																																							
Candidate Sites - Second Call																																																																							
Candidate Sites - Assessments																																																																							
Identification/assessment of revised growth and spatial options																																																																							
Preparation of revised Preferred Strategy,Initial ISA Report & HRA																																																																							
Revised Preferred Strategy Political Reporting																																																																							
Pre-Deposit Consultation																																																																						
Consultation on revised Preferred Strategy (PS)																																																																						
Consultation on revsied Initial ISA Report and HRA																																																																						
Analyse PS consultation responses and prepare Initial Consultation Report																																																																						

Key Stage - Definitive	2021												2022												2023												2024												2025												2026											
	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D
Prepare Deposit Plan, update ISA/HRA																																																																										
Deposit Plan Political Reporting																																																																										
Statutory Deposit																																																																										
Consultation on Deposit Plan, ISA Report & HRA																																																																										
Analyse consultation responses & prepare Consultation Report																																																																										
Key Stage - Indicative	2021												2022												2023												2024												2025												2026											
	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D
Submission of RLDP to WG																																																																							
Examination																																																																									
Inspector's Report - Preparation																																																																									
Inspector's Report - Publication																																																																								
Adoption																																																																								

Appendix 3 – Risk Assessment

Issue	Potential Risk(s)	Mitigation	Probability and Impact
Gap in major applications coming forward until the RLDP is adopted.	While the 2020 Ministerial letter has confirmed that the Adopted LDP will remain the in force until the RLDP is adopted, there will be a delay in major applications coming forward until RLDP adoption. This will impact on the Council's ability to address/deliver the RLDP issues and objectives, including the demographic and affordability challenges facing the County, until the RLDP is adopted, and puts pressure on the deliverability of the housing and employment figures over the Plan period, with more reliance on delivery towards the end of the Plan period.	Progression of the RLDP in a timely manner will ensure that the Council has an adopted RLDP in place as soon as possible in 2025, minimising the negative implications associated with the delay in major applications coming forward.	Medium Likelihood Medium Impact
Objection from Welsh Government to the Preferred Strategy and/or Deposit Plan	Programme slippage	Collaboration with WG officials in accordance with WBFGA five ways of working.	Low Likelihood High Impact
	Programme slippage.		Medium Likelihood

Issue	Potential Risk(s)	Mitigation	Probability and Impact
Change in staff resources available to assist with RLDP preparation.		Consider additional resources (including support from other sections within the Council) and ensure robust structure.	**High Impact**
Staff turnover in small team.	Programme slippage.	Ensure RLDP process maintains highest level corporate priority.	**Medium Likelihood** **High Impact**
Reduction and lack of financial resources.	Programme slippage. Delay in securing information required to progress Plan.	Ensure Plan preparation process is adequately costed with in-built capacity for unforeseen costs.	**Medium Likelihood** **High Impact**
Council decision making structure/ political reporting cycle.	Programme slippage.	Streamline decision-making procedures and ensure timetable is realistic.	**Medium Likelihood** **Medium Impact**
Political Change/ Elections.	Programme slippage.	Early Member training.	**Low Likelihood**

Issue	Potential Risk(s)	Mitigation	Probability and Impact
			Medium Impact
Lack of consensus throughout the organisation and/ or lack of support from officers/other departments in production of the evidence base.	Programme slippage.	Ensure organisation wide support of Plan process and timetable from outset.	**Low Likelihood**
			Medium Impact
Challenging timetable to prepare RLDP due to greater than anticipated workload (e.g. greater number of representations received, ISA/SEA/HRA requirements).	Programme slippage.	Realistic timetabling for each stage of Plan preparation, adequate resources and careful project management with adequate contingencies/flexibility. If appropriate reconsider timetable and resources.	**High Likelihood**
			High Impact

Issue	Potential Risk(s)	Mitigation	Probability and Impact
National Issues			
Additional requirements arising from the issue of new legislation and/or national guidance. e.g. general conformity with Future Wales, alignment with revised Planning Policy Wales and LDP Manual, revised TAN15, water quality.	Programme slippage.	Monitor emerging legislation/guidance; report and respond early to changes as necessary. Continued collaboration with key partners.	**High Likelihood** **High Impact**
Involvement in preparation of Strategic Development Plan (SDP)	Programme slippage. Resource implications, extent of input to the SDP currently unknown.	Ensure sufficient resources are available and corporate support of SDP process and timetable from outset.	**Medium Likelihood** **Medium Impact**

Issue	Potential Risk(s)	Mitigation	Probability and Impact
Direction from Welsh Government Cabinet Secretary to prepare a Joint Plan.	Work on individual LDP to date would be abortive.	Cannot be mitigated, full justification of the Council's approach to produce an individual Monmouthshire LDP has been provided.	**Low Likelihood** **High Impact**
Ability of statutory consultees and/or PEDW to respond within set timescales.	Programme slippage. Key milestones are not met. Examination and/or Receipt of Inspectors Report delayed.	Maintain close liaison with statutory consultees and PEDW to ensure early identification of potential problems.	**Medium Likelihood** **Medium Impact**
Local Issues			
Insufficient information to undertake ISA/SEA.	Programme slippage.	Identify expectations of consultation bodies. Consider additional resources.	**Low Likelihood** **Medium Impact**

Issue	Potential Risk(s)	Mitigation	Probability and Impact
Large volume and /or highly significant levels of objection to proposals e.g. site allocations.	Programme slippage. Plan cannot be submitted for examination without significant work.	Ensure close liaison and early/continued involvement of the community, statutory bodies & stakeholders throughout the Plan preparation process.	**Medium Likelihood** **Medium Impact**
Review of RLDP resulting from a requirement to align with a Strategic Development Plan.	Programme slippage.	Ensure involvement in progress of regional work. Early response to potential local implications.	**Low Likelihood** **Low Impact**
Plan fails the test of 'soundness'.	Programme slippage. Part of the Plan is excluded or changed. Additional work needs to be carried out before the Plan can be adopted. The Plan could be withdrawn.	Ensure RLDP has a robust evidence base, properly subjected to ISA/HRA, with well audited community and stakeholder engagement.	**Low Likelihood**

Issue	Potential Risk(s)	Mitigation	Probability and Impact
		Maintain liaison with Welsh Government on preparation procedures.	High Impact
Legal Challenge.	Programme slippage. Adopted Plan quashed in whole or part. Additional work/time/ financial requirements.	Good knowledge of statutory requirements to ensure compliance.	Low Likelihood Medium Impact

Appendix 4 – Glossary of terms

Adopted Plan	The final version of the RLDP.
Adoption	The final stage of Local Development Plan preparation where the RLDP becomes the statutory development plan for the area it covers.
Annual Monitoring Report (AMR)	A yearly report to monitor the effectiveness of the RLDP and ultimately determines whether any revisions to the Plan are necessary. It assesses the extent to which the RLDP strategy and objectives are being achieved and whether the RLDP policies are functioning effectively.
Baseline	A description of the present state of an area.
Candidate Site	A site nominated by an individual with an interest in land (i.e. landowner, developer, agent or member of the public) to be considered for inclusion in the LDP. All Candidate Sites will be assessed for suitability for inclusion as potential allocations.
Community	People living in a defined geographical area, or who share other interests and therefore form communities of interest.
Community Involvement Scheme (CIS)	The Community Involvement Scheme forms part of the Delivery Agreement. It outlines the principles of engagement and provides detail on how the local planning authority will involve communities and stakeholders (including businesses and developers) in the preparation of the Local Development Plan.
Consensus Building	A process of dialogue with the community and other interested parties to understand relevant viewpoints and to seek agreement where possible.
Consultation	A formal process in which comments are invited on a particular topic or draft document usually within a defined time period.
Council	Monmouthshire County Council (excluding for planning purposes the Brecon Beacons National Park administrative area that falls within Monmouthshire).
Delivery Agreement (DA)	A document comprising the local planning authority's timetable for the preparation of a Local Development Plan, together with its Community Involvement Scheme, submitted to the Welsh Government for agreement.
Deposit Consultation	A formal stage in which individuals and organisations can make representations on the RLDP. Representations that relate to whether the Plan is 'sound' can then be examined by an Inspector.
Deposit Plan	This is a full draft of the RLDP which undergoes a formal consultation period prior to it being submitted to the Welsh Government for public examination.
Duly Made	Representations to the development plan which are made in the correct manner and within the specified consultation time period.

Engagement	A proactive process that seeks to encourage the involvement and participation of the community and other groups in the decision making process.
Evidence Base	Information and data that provides the basis for the preparation of the RLDP vision, objectives, policies and proposals and justifies the soundness of the policy approach of the LDP.
Examination	The examination involves public examination of the Deposit RLDP, the Deposit representations, the report of consultation, evidence base/background documents and the Integrated Sustainability Appraisal Report. This is carried out by the PEDW on behalf of the Welsh Government.
Habitats Regulations Assessment (HRA)	Habitats Regulations Assessment (HRA) relates to the assessment of the impacts of a Plan (or project) against the nature conservation objectives of European designated sites for any likely significant effects. HRA also ascertains whether the proposed Plan would adversely affect the integrity of the site.
Indicator	A measure of variables over time, often used to measure progress in the achievement of objectives, targets and policies.
Inspector's Report	The Report prepared by an independent Inspector who examines the RLDP. The Inspector's Report contains recommendations on the content of the final RLDP and is binding upon the Council. The Council must adopt the RLDP in the manner directed by the Inspector.
Involvement	Generic term relating to community involvement that includes both participation and consultation techniques.
Local Development Plan (LDP)	A land use plan which includes a vision, strategy, area wide policies for development types, land allocations, and policies and proposals for key areas of change and protection. Allocations and certain policies are shown geographically on the Proposals Map forming part of the Plan. The LDP is a statutory development plan that each local planning authority area is required to produce in Wales.
Local Planning Authority (LPA)	In the case of Monmouthshire, this is Monmouthshire County Council (excluding the Brecon Beacons National Park administrative area where the local planning authority is the National Park).
Monmouthshire County Council (MCC)	This is the name of the Local Planning Authority preparing the RLDP.
Objective	A statement of what is intended, specifying the desired direction of change in trends.
Participation	A process rather than a single event that provides opportunity for direct engagement with the community and stakeholders to input into decision making.

Partners	Other local authority departments and statutory bodies where the RLDP will help to deliver some of the objectives of their strategies. Partners may be expected to contribute in the formulation of relevant parts of the Plan.
Planning and Environment Decisions Wales (PEDW)	PEDW are an independent body who will be responsible for the formal examination of the RLDP.
Planning Policy Wales (PPW)	Planning policy guidance for Wales produced by the Welsh Government is set out in this document
Pre-Deposit	Stages of preparation and consultation of the RLDP before the Deposit Plan is finalised and approved by the Council.
Preferred Strategy	This sets out the broad strategic direction for the RLDP. This includes the preferred level of growth along with the spatial strategy for distributing the growth. It also includes the vision, issues and objectives of the Plan.
Press Releases	Sent to Welsh media, including newspapers, radio and television news stations as appropriate. Media may choose not to print or broadcast an item.
Regulation	Regulations are set out in Welsh Statutory Instruments. They provide the framework for the preparation of the RLDP.
Report of Consultation	A Consultation Report is one of the documents required to be submitted for independent examination. An initial consultation report is also required for the pre-deposit stage.
Representations	Comments received in relation to the RLDP, either in support of, or in opposition to.
Review Report	The Review Report provides an overview of the issues that have been considered as part of the full review process and identifies changes that are likely to be needed to the RLDP, based on evidence. It also sets out the type of revision procedure to be followed in revising the LDP.
Scoping	The process of deciding the scope and level of detail of an integrated sustainability appraisal (SA), including the sustainability effects and options which need to be considered, the assessment methods to be used and the structure and contents of the SA Report.
Soundness Tests	In order to adopt a RLDP it must be determined to be 'sound' by the Planning Inspector. The Tests of Soundness are set out in the Development Plans Manual (Edition 3, March 2020). There are three tests to make that judgement in relation to the Plan as a whole. A framework for assessing the soundness of LDPs has been developed by the Planning Inspectorate.
Stakeholders	People whose interests are directly affected by a RLDP (and/ or Integrated Sustainability Appraisal/ Strategic Environmental

	Assessment) and whose involvement is generally through representative bodies.
Strategic Environmental Assessment (SEA)	Generic term used internationally to describe environmental assessment as applied to policies, Plans and programmes. The European Strategic Environmental Assessment Directive (2001/42/EC) requires a formal "environmental assessment of certain Plans and programmes, including those in the field of planning and land use".
Strategic Development Plan (SDP)	A Strategic Development Plan is a tool for regional planning to cover cross-boundary issues such as housing and transport. It will be prepared by a Strategic Planning Panel across a region. LPA's must have regard to the SDP when developing their RLDPs.
Submission	When the RLDP, ISAR and HRA are formally submitted to the Welsh Government for independent examination by a Welsh Government appointed Inspector.
Supplementary Planning Guidance (SPG)	Provide more detailed or site specific guidance on the application of RLDP Policies. They provide supplementary information in respect of the policies in a LDP. SPG does not form part of the RLDP and is not subject to independent examination.
Integrated Sustainability Appraisal (ISA)	Tool for appraising policies, including LDPs, to ensure they reflect sustainable development objectives (i.e. social, environmental and economic factors). Each LPA is required by Section 62(6) of the Act to undertake SA of their Local Development Plan. This form of sustainability appraisal fully incorporates the requirements of the Strategic Environmental Assessment Directive.
Integrated Sustainability Appraisal Report (SAR)	A document required to be produced as part of the Integrated Sustainability Appraisal process to describe and appraise the likely significant effects on sustainability of implementing a LDP, which meets the requirements for the Environmental Report under the SEA Directive. Section 62(6) of the Act requires each LPA to prepare a report of the findings of the SA of the LDP. It is an integral part of the development Plan making process.
Timetable	Sets out the dates by which key stages and processes of RLDP preparation are expected to be completed. These are definitive for stages up to the deposit of the RLDP and indicative for the remaining stages after.
Well-being of Future Generations (Wales) Act (2015)	The Well-being of Future Generations (Wales) Act 2015 is legislation that requires public bodies, such as local authorities, to put long term sustainability at the forefront of their thinking to make a difference to lives of people in Wales. Local authorities must work towards the seven well-being goals and enact the five ways of working set out in the Act.

APPENDIX 3

monmouthshire
sir fynwy

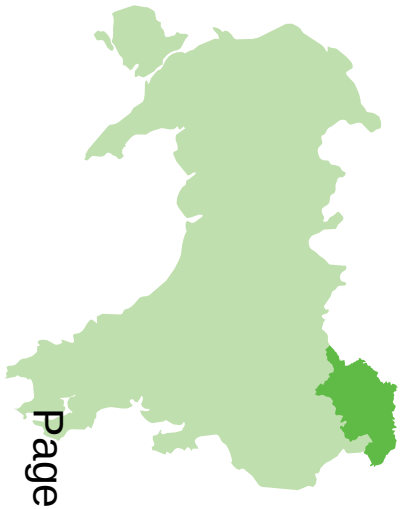
Replacement Local Development Plan 2018-2033

Deposit Plan - Summary

October 2024

What is the Replacement Local Development Plan (RLDP)?

Land for Homes and Jobs and Protecting our Environment



Monmouthshire County Council is preparing a Replacement Local Development Plan (RLDP) for the period from 2018-2033. The RLDP will allocate land for sustainable development, designate land for protection and contain policies to provide the basis for decisions on planning applications. It will cover the whole county except for the area within the Bannau Brecheiniog National Park (BBNP).

It supports the delivery of the Council's core purposes of becoming a net zero carbon county, supporting well-being, health and dignity for everyone at every stage of life.

It will assist in delivering the Council's core objectives and addressing the core issues of:

- Providing essential **affordable homes** at pace and scale.
- Responding to the **climate emergency** by delivering net zero carbon homes in exemplar well connected places.
- Responding to the **nature emergency** with policies that protect and enhance Monmouthshire's special environment and biodiversity.
- Ensuring **communities are socially and economically sustainable** by attracting and retaining younger people to rebalance our ageing demographic.
- Supporting our **economic prosperity** by providing a range of good quality employment land opportunities to encourage business growth and attract inward investment.

The RLDP Process:

Preparing the RLDP is a step-by-step process. We are currently in the Deposit Plan stage of the process.

These are the key steps to the RLDP:

1 Delivery Agreement
The formal timetable of the RLDP and Community Involvement Scheme
Revised October 2024

2 Evidence Gathering
Social, environmental, economic and cultural data that informs the Plan
July 2018 - October 2024

Consultation & Engagement

3 Preferred Strategy
Setting how much growth and where it will go
Consultation on the Preferred Strategy and Candidate Site Register December 2022- January 2023

Consultation & Engagement

4 Deposit Plan
A draft version of the RLDP, which will identify proposed sites for specific uses
October 2024*
***Consultation on the Deposit Plan November 2024 - December 2024**

Consultation & Engagement

5 Submission, Examination and Adoption
The RLDP is submitted to the Welsh Government and examined by an Independent Planning Inspector. If accepted the Plan can be formally adopted
Summer 2025 - Spring 2026

6 Monitoring and Review
Reviewed annually to monitor the effectiveness of the RLDP
2026 Onwards

What is the Deposit Plan?

The Deposit Plan is a key stage in the preparation of the RLDP. It progresses the evidence gathering and stakeholder engagement undertaken to date and sets out the strategy, proposals and detailed policies for the future use and development of land in Monmouthshire from 2018-2033.

The Deposit RLDP is accompanied by the following maps:

Proposals Map: This illustrates the geographical location and extent of the site-specific development and protection that are designated in the RLDP.

Constraints Map: This shows the geographical location and extent of development constraints created by legislation outside of the development plan process, for example, Scheduled Ancient Monuments, flood plains and Sites of Special Scientific Interest (SSSI). Although this does not form part of the RLDP, regard must be given to the constraints map when considering development proposals. The Constraints Map includes designations made by statutory bodies other than the Council and will be updated as necessary.

The Deposit RLDP will be supported by two independent assessments:

Integrated Sustainable Appraisal (ISA): assesses the extent to which the Plan's strategy and policies will help achieve the wider environmental, economic, social and cultural objectives of the RLDP. The ISA also assesses the Plan's impact on health, equality and the Welsh Language..

Habitats Regulations Assessment (HRA): assesses whether the Plan proposals would have any significant adverse effects on designated sites, including Special Areas of Conservation (SACs) and Special Protection Areas (SPAs).

The RLDP will also be accompanied by **an Infrastructure Delivery Plan (IDP)**, which will set out what is needed to support the development of the residential site allocations. It will sit alongside the council's **Local Transport Strategy** and an **Economy, Employment and Skills Strategy.**

The Deposit Plan consists of a written statement detailing the strategy, proposals and policies, along with a proposals map on a geographical base. **Its structure and format is as follows:**

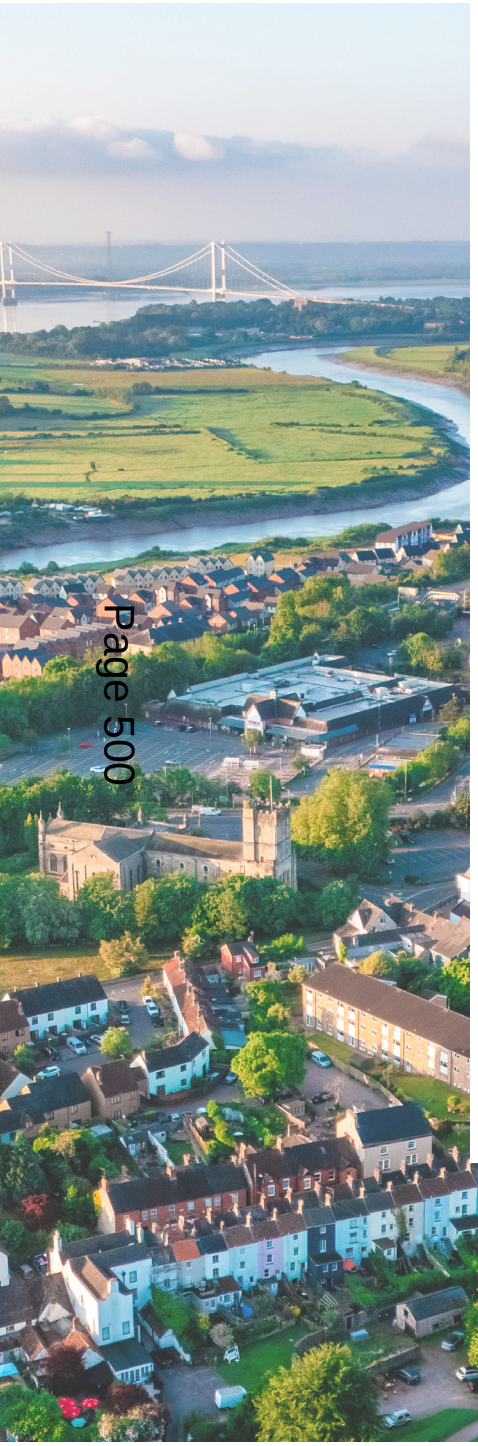
Key Issues, Challenges and Opportunities
Provides a summary of the key issues, challenges and opportunities within Monmouthshire.

RLDP Strategic Framework
Outlines RLDP Vision and Objectives emerging from evidence base, sets context for Plan's strategic direction, details Monmouthshire growth & spatial strategy.

Implementation and Delivery
Sets out the RLDP strategic policies, site allocation policies and detailed development management policies. This policy framework provides the basis for the rational and consistent consideration of planning applications and appeals.

Monitoring Framework
Identifies key policy indicators and targets which will be used to assess the effectiveness of the RLDP. This will provide a basis for the RLDP annual monitoring reports (AMR).

Appendices
Appendices set out further detail and form part of the RLDP. They are referenced throughout the main document as appropriate.



Our Key Issues, Challenges and Opportunities

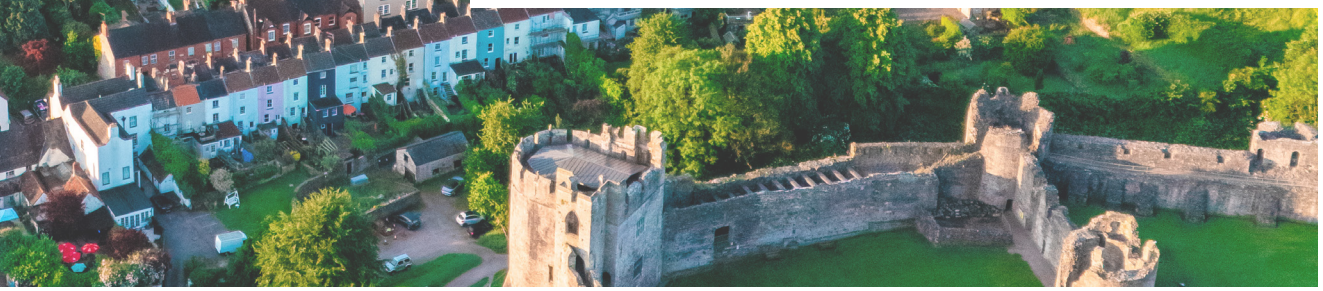
To assist in delivering the council's core purpose of becoming a net zero carbon county, supporting well-being, health and dignity for everyone at every stage of life, a number of key issues and challenges have been identified.

1. Delivering essential affordable homes at pace and scale with exemplar well connected places for both existing and future residents.

2. Responding to our climate and nature emergency with policies requiring new homes to be net zero carbon, and supportive policy framework to incorporate renewable energy generation and technologies where appropriate. The Plan also includes protection policies that safeguard and enhance Monmouthshire's unique environment.

3. Ensuring our communities are socially and economically sustainable by providing accessible places to live and work and a choice and range of homes to retain and attract younger people and rebalance our ageing demography.

4. Support our economic prosperity by providing a range of good quality employment land opportunities to encourage business growth and attract inward investment. The Plan also includes supportive policy frameworks for our agricultural, tourism and retail economies.



Lack of affordable housing:
There are 2,064 households in housing need
(MCC Local Housing Market Assessment Refresh 2022-2037)

High level of out commuting:
Net out commute of some 2,800 residents
(ONS 2021 annual population survey)

The ageing population and relative absence of 20-40 year olds which impact our economic base and future economic prospects

The protection of our landscapes and heritage that make Monmouthshire a unique, special and attractive place to live

Opportunities associated with the removal of Severn Bridge tolls, Cardiff Capital Region City Deal and South East Wales Metro

The need to tackle climate change, carbon reduction and pollution
MCC passed a motion to tackle climate change in May 2019
We have an urgent need to tackle water quality and phosphate pollution in our rivers

High average house prices: £400,496
(based on sales and valuations October 2023 - March 2024)

The challenges of rural isolation and sustaining rural communities

Our Vision for Monmouthshire

By 2033, Monmouthshire will be home to well-connected, exemplar affordable housing-led, net zero carbon places that provide employment and support demographically balanced sustainable and resilient communities for all, where:

Communities

People live in inclusive, equal, safe, cohesive, prosperous and vibrant communities. Urban and rural areas are well-connected and have better access to local services, facilities, open spaces and employment opportunities.

Economy

Communities and businesses are part of an economically thriving, ambitious and well-connected county.

Environment

The best of the county's built heritage, countryside, biodiversity, landscape and environmental assets have been protected and enhanced to retain its distinctive character.

Connected

People enjoy healthier, more sustainable lifestyles with improved access to public transport and active travel opportunities and have a minimised impact on the global environment, supporting our ambitions for a zero carbon county.

What goals do we need to set to achieve Our Vision?

Aspirational yet achievable objectives for the RLDP have been set to meet our key issues, and deliver the vision.

Housing

To provide urgently needed affordable housing within exemplar, mixed, sustainable and well-connected places for both existing and future residents.

Demography

To increase opportunities for the younger population to live and work within Monmouthshire, creating a more balanced demography and socially and economically sustainable communities.

Climate and Nature Emergency

To strive to limit the increase in global temperatures to 1.5ºC, supporting carbon reduction through a variety of adaptation measures including, facilitating resilient ecosystems and nature recovery, the use of renewable energy, net zero carbon homes, the design and location of new development, encouraging balanced job and population growth to reduce out commuting, the provision of broadband connectivity to reduce the need to travel, the provision of ultra-low emission vehicle charging infrastructure to reduce emissions and improve air quality, and the provision of quality green infrastructure.

Green Infrastructure, Biodiversity & Landscape

To protect, enhance and manage the resilience of Monmouthshire's natural environment, biodiversity and ecosystems and the connectivity between them, while at the same time maximising benefits for the economy, tourism, health and well-being. This includes the Wye Valley National Landscape (AONB), the county's other high quality and distinctive landscapes, protected sites, protected species and other biodiversity interests.

Economic growth/employment

To support a thriving, well-connected, diverse economy, which provides a range of good quality employment opportunities to enable and encourage indigenous business growth and attract inward investment and competitive innovative businesses, including the provision of start-ups and grow on spaces.

Our core underpinning objectives are:

1. Delivering essential affordable homes at pace and scale with exemplar well connected places for both existing and future residents.

2. Responding to our climate and nature emergency with policies requiring new homes to be net zero carbon, and supportive policy framework to incorporate renewable energy generation and technologies where appropriate. The Plan also includes protection policies that safeguard and enhance Monmouthshire's unique environment.

3. Ensuring our communities are socially and economically sustainable by providing accessible places to live and work and a choice and range of homes to retain and attract younger people and rebalance our ageing demography.

4. Support our economic prosperity by providing a range of good quality employment land opportunities to encourage business growth and attract inward investment. The Plan also includes supportive policy frameworks for our agricultural, tourism and retail economies.

Our goals continued...

Placemaking

To create exemplar sustainable places through design, layout and mix of uses that enhance the character and identity of Monmouthshire's settlements and landscape; create attractive, safe and accessible places to live, work and visit; and promote people's prosperity, health, happiness and well-being.

Infrastructure

To ensure that appropriate physical and digital infrastructure (including community and recreational facilities, education, sewerage, water, transport, health care and broadband, etc.) is in place or can be provided to accommodate new development.

Accessibility

To seek to reduce the need to travel by promoting a mix of land use allocations and improved internet connectivity, and where travel is required, to provide opportunities for active travel and integrated sustainable transport above the use of the private car.

Communities

To ensure Monmouthshire is a connected place where people feel part of a community, are valued and have good access to education, employment, shops, housing, public transport, active travel, healthcare, community and cultural facilities. .

Rural Communities

To sustain existing rural communities as far as possible by providing affordable homes and development opportunities of an appropriate scale and location in order to assist in building sustainable rural communities and strengthening the rural economy.

Health and Well-being

To improve access to recreation, sport, leisure activities, open space and the countryside and to enable healthier lifestyles.
To support the Health Board to improve health infrastructure to meet community needs.

Town and Local Centres

To sustain and enhance the centres of Abergavenny, Caldicot, Chepstow, Magor, Monmouth and Usk as vibrant and attractive centres serving the needs of their population and those of their surrounding hinterlands. Supporting the adaptation to meet the needs of the evolving role of the high street.

Our core underpinning objectives are:

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4. Support our economic prosperity by providing a range of good quality employment land opportunities to encourage business growth and attract inward investment. The Plan also includes supportive policy frameworks for our agricultural, tourism and retail economies.

Our goals continued...

Culture, Heritage & Welsh Language

To protect and enhance Monmouthshire's built environment, culture and heritage for the future while maximizing benefits for the economy, tourism and social well-being, including supporting and safeguarding the Welsh Language.

Land

To promote the efficient use of land, including the need to:

- Maximise opportunities for development on previously developed land whilst recognising that brownfield opportunities are limited in Monmouthshire.
- Protect the best and most versatile (BMV) agricultural land while recognising that this will not always be possible given the high proportion of BMV land in the County and the limited opportunities for brownfield development.
- Support the adaptation and re-use of existing sustainably located buildings.

Natural Resources

To ensure the efficient use of natural resources, including providing increased opportunities for water efficiency, energy efficiency, renewable energy, recycling and waste reduction.

Flood Risk

To ensure that new developments consider the risk of flooding, both current and future, avoiding inappropriate development in areas at risk from flooding or that may increase the risk of flooding elsewhere. Development should be designed using natural flood management measures to manage flood risk and surface water run-off appropriately.

Minerals & Waste

To meet the county's regional and local obligations to manage and dispose of its waste and to safeguard and exploit its mineral resource sustainably.

Our core underpinning objectives are:

1. Delivering essential affordable homes at pace and scale with exemplar well connected places for both existing and future residents.

2. Responding to our climate and nature emergency with policies requiring new homes to be net zero carbon, and supportive policy framework to incorporate renewable energy generation and technologies where appropriate. The Plan also includes protection policies that safeguard and enhance Monmouthshire's unique environment.

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The RLDP Sustainable and Resilient Communities Strategy

Our Key Issues, Vision and Objectives, along with community consultation and engagement sessions, have informed how much growth (homes and jobs) is needed in the county over the Plan period and where that growth is located.

How much growth

Between 2018-2033 The Sustainable and Resilient Communities Strategy aims to:

- Grow Monmouthshire by up to **6,210 homes*** This includes the provision of up to **2,000 affordable homes**
- Support a level of job growth that supports our housing growth and grows Monmouthshire's economy. To support our job growth we will allocate a minimum of **38ha of employment land** in accessible and sustainable locations and provide a supportive policy framework to encourage business growth.

*There are currently approximately 4,080 homes in Monmouthshire's Housing landbank. This means that we will need to allocate land to provide **2,130 new homes** including **1,065 new affordable homes.**

Housing Supply Component	No. of Homes	
Housing growth figure	6,210	RLDP Housing Requirement – 5,400 +15% flexibility allowance (as per Welsh Government guidance).
Existing Commitments 2018-2024	3,018	Homes that have been built and/or have planning permission between 2018-2024.
Windfall Allowance	887	The predicted amount of unplanned housing anticipated within settlement boundaries for example single plots, or sites that have a change of use.
Existing LDP Rollover sites	175	Existing LDP sites which do not currently benefit from planning permission. Three sites, two in Monmouth and one in Little Mill make up the 'rollover' allocations component.
New Allocations	**2,130**	**New allocations identified in the RLDP.**

Housing supply component:

Because the Plan period has already begun (2018) most of the housing growth has already taken place as homes have already been built/are under construction/ or have planning permission. This growth is termed 'existing commitments'.

The housing growth figure also takes into account:

- Windfall housing' (unplanned housing that is predicted to be built within existing settlements between 2018-2033); and 'Rollover Sites' (sites allocated from the previous plan but have not obtained planning permission).

Growth in Primary Settlements

Abergavenny (Inc. Llanfoist, Chepstow, Monmouth)

Caldicot (Inc. Severnside area: Caerwent, Crick, Magor and Undy, Rogiet, Portskewett and Sudbrook)

Growth in Secondary Settlements Penperlleni, Raglan, Usk

Growth in Rural Settlements

Where will the growth go?

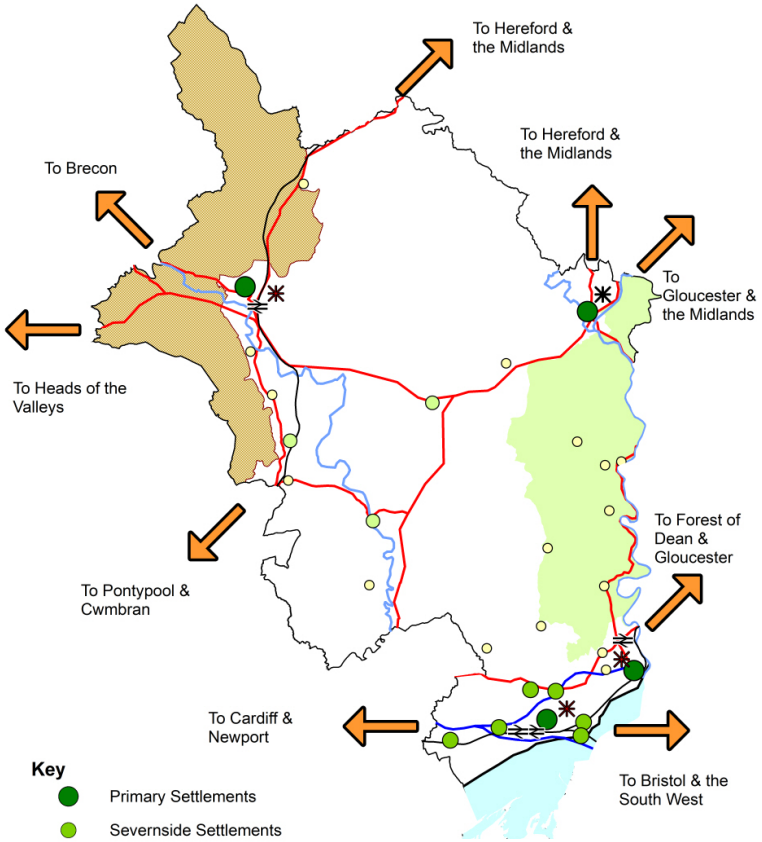
Growth will focus on the county's most sustainable **Primary Settlements of Abergavenny, Chepstow, Monmouth and Caldicot, including Severnside.**

Focusing growth in the most sustainable settlements will limit the impact of climate change and ensure good placemaking principles of attractive, accessible places to live and work that reduce the need to travel and have access to sustainable transport links and walking routes to town centres.

A smaller proportion of growth is allocated in our **Secondary Settlements of Usk, Raglan and Penperlleni** and our most sustainable **Main Rural Settlements.** Growth in rural locations will deliver much needed affordable homes for local people and help to address rural inequality and rural isolation in these areas by sustaining communities.

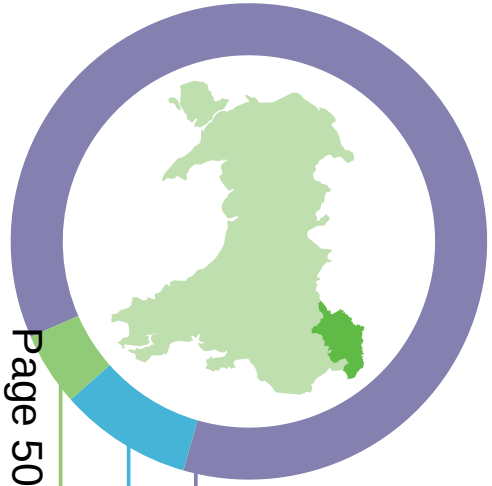
The sites selected have been informed by the consultation responses received on the 2021 Preferred Strategy and the December 2022 Preferred Strategy, as well as our evidence base.

Our Spatial Strategy is illustrated in our Key Strategic Diagram



How will we deliver exemplar affordable homes at pace and scale?

The RLDP has identified housing land to meet the growth required to deliver Monmouthshire's new homes including, our ambition to deliver affordable homes at pace and scale.



Growth in Primary Settlements

Abergavenny
(Inc. Llanfoist, Chepstow, Monmouth)

Caldicot
(Inc. Severnside area: Caerwent, Crick, Magor and Undy, Rogiet, Portskewett and Sudbrook)

Growth in Secondary Settlements
Penperlleni, Raglan, Usk

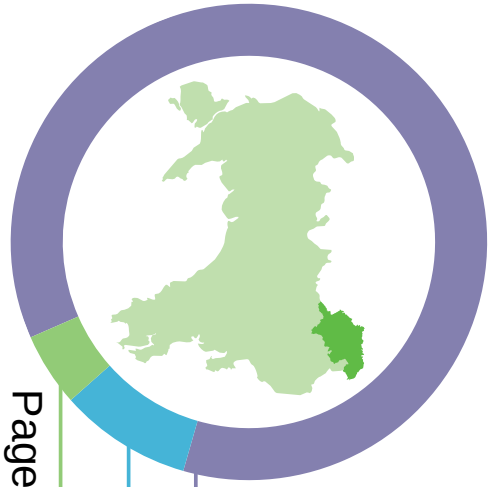
Growth in Rural Settlements

Primary Settlements

Site Name	Settlement	Allocation Type	Site Area (ha)	Approximate No. of Total Homes in Plan Period	50% of which will be Affordable Homes
Land to the East of Abergavenny	Abergavenny	**Strategic Mixed-use** Development including: • Residential • Neighbourhood Centre • Park and Ride • B1 Use employment	35.9	500	250
Land to the East of Caldicot/North of Portskewett	Caldicot	**Strategic Mixed-use** Development including: • Residential • Primary school • Neighbourhood Centre • B1 Use Class employment • Strategic public open space	64	770	385
Land at Mounton Road	Chepstow	**Strategic Mixed-use** Development including: • Residential • Commercial uses such as C1 Use Class Hotel • C2 Use Class residential care home	12.8	146	73
Land at Leasbrook	Monmouth	**Strategic Residential**	11	270	135
Land at Penlanlas	Abergavenny	**Residential**	6.17	100	50
Land at Rockfield	Monmouth	**Residential**	1.5	60	30
Land at Drewen Farm	Monmouth	**Residential** (rollover site)	6.6	110	55
Tudor Road, Wyesham	Monmouth	**Residential** (rollover site)	2.1	50	25
Land at Former MoD	Caerwent	**Mixed-use** • Residential • B1 Use employment	4.2	40	20

The geographical locations of the housing land identified in the table is set out on the Deposit Plan's Proposals Map.

How will we deliver exemplar affordable homes at pace and scale?



Growth in Primary Settlements

Abergavenny
(Inc. Llanfoist, Chepstow, Monmouth)

Caldicot
(Inc. Severnside area: Caerwent, Crick, Magor and Undy, Rogiet, Portskewett and Sudbrook)

Growth in Secondary Settlements
Penperlleni, Raglan, Usk

Growth in Rural Settlements

Secondary Settlements

Site Name	Settlement	Allocation Type	Site Area (ha)	Approximate No. of Total Homes in Plan Period	50% of which will be Affordable Homes
South of Monmouth Rd	Raglan	**Residential**	4.5	54	27
Land East of Burrium Gate	Usk	**Residential**	2.6	40	20
Land West of Trem yr Ysgol	Penperlleni	**Residential**	3.4	42	21

Rural Settlements

Site Name	Settlement	Allocation Type	Site Area (ha)	Approximate No. of Total Homes in Plan Period	50% of which will be Affordable Homes
Land adjacent to Piercefield Public House	St Arvans	**Residential**	1.1	16	8
Land at Churchfields	Devauden	**Residential**	1	20	10
Land East of Little Mill	Little Mill	**Residential**	1.68	20	10
Land North of Little Mill	Little Mill	**Residential** (rollover site)	0.87	15	8
Land adjacent to Llanellen Court Farm	Llanellen	**Residential**	1.56	26	13
Land West of Redd Landes	Shirenewton	**Residential**	1.76	26	13

The geographical locations of the housing land identified in the table is set out on the Deposit Plan's Proposals Map.

Growth in Primary Settlements

Abergavenny
(Inc. Llanfoist, Chepstow, Monmouth)

Caldicot
(Inc. Severnside area: Caerwent, Crick, Magor and Undy, Rogiet, Portskewett and Sudbrook)

Growth in Secondary Settlements
Penperlleni, Raglan, Usk

Growth in Rural Settlements

How will we deliver exemplar affordable homes at pace and scale?

Why were these sites selected?

- These sites have provided sufficient evidence of viability and deliverability to demonstrate that the homes will be delivered by 2033.
- In accordance with the PPW12's site search sequence, preference has been given to the development of previously developed land (brownfield land). It is, however, recognised that there are limited opportunities for further significant brownfield development in Monmouthshire. While growth is focused in the most sustainable settlements, it must be recognised that landscape quality and agricultural land quality are high throughout the county. As such, these challenges cannot be avoided via a different spatial option.
- The Plan allocates those sites that are the best connected, most sustainable, deliver placemaking benefits and are least harmful, which has required balanced planning considerations and decisions with a preference for promoting the most sustainable sites.

How will these sites be delivered?

- The homes will be built to Net Zero Carbon standards, incorporating renewable energy generation technologies, low carbon heating systems and ULEV charging points.
- 50% of the homes for each site will be affordable housing comprising a mix of housing types and tenures to meet local needs.
- The developments will all be required to meet the placemaking principles of the RLDP. This ensures well-connected, green infrastructure led, balanced communities that are not only respectful but also protective of Monmouthshire's natural and historic environment.
- The sites will be required to provide high quality, usable open space and appropriate green spaces according to the agreed standards set out in the RLDP.
- The design of the sites must prioritise connections and active travel to local trip attractors and public transport facilities, and they must contribute towards any necessary infrastructure improvements.

How will we support economic prosperity?

The RLDP has identified the following **Employment Land*** in accessible and sustainable locations. This will support job growth, allow residents to live and work in Monmouthshire, and reduce levels of out-commuting.

What is Employment Land?

* **Employment land** relates to **'B use classes'** in planning terms, which is land for industry such as light industry, research and development (B1), manufacturing (B2) and storage and distribution (B8).

Site Name	Area (Ha)	Use Class
Land at Nantgavenny Business Park, Abergavenny	0.59	B1
Poultry Units, Rockfield Road, Monmouth	1.3	B1
Land North of Wonastow Road, Monmouth	4.5	B1, B2, B8
Newhouse Industrial Estate, Chepstow	2.5	B1, B2, B8
Land adjoining Oak Grove Farm, Caldicot	6	B1, B2, B8
Quay Point, Magor	14	B1, B2, B8
Rockfield Farm, Undy	3.2	B1
Gwent Euro Park, Magor	7	B1, B2, B8
Raglan Enterprise Park, Raglan	1.5	B1, B2, B8
Land West of Raglan	4.5	B1, B2, B8
Land to the East of Abergavenny	1	B1
Land at Former MoD Site, Caerwent	1	B1
Land to the East of Caldicot	1	B1

The geographical location of the employment land identified is set out on the Deposit Plan's Proposal Map.

- There are new employment opportunities on our mixed-use allocations: Land to the East of Abergavenny, Land to the East of Caldicot/North of Portskewett and Land at the Former MoD Site Caerwent.
- Demand for physical employment land/space is changing. However, not all employment sectors, such as manufacturing and distribution can work from home. Therefore, the RLDP must allocate sufficient employment land (B use class) to meet the employment needs of such businesses.
- Many other jobs within Monmouthshire will be delivered through other foundational sectors such as **agriculture, tourism, retail** and **leisure**. The RLDP plans positively for these sectors through complimentary and supportive policies.

Our Supportive Economy Policies

Policy S11 supports Monmouthshire's **rural economy** to enable rural enterprise uses and the diversification of the rural economy subject to scale and type being compatible with the surrounding area. Conversion of existing buildings within the countryside is encouraged over new build.

Policy S12 supports Monmouthshire's **visitor economy** and supports **sustainable forms of tourism**, such as camping and glamping, that can demonstrate minimal impact on the surrounding environment. The Policy also supports exceptional tourism proposals that can demonstrate significant economic benefits and protects the visitor economy from the loss of facilities.

Policy S14 protects the **retail hierarchy** and core uses of Monmouthshire's historic market towns and local centres to ensure a wide range of uses including leisure and cultural as well as a **Primary Frontage core retail.**

This will ensure Monmouthshire's towns retain and enhance their retail and social appeal to attract residents and visitors and that they continue to remain vibrant and attractive. The Policy supports proposals that will enhance the vitality and vibrancy of our retail economy. It does not support uses that undermine the vibrancy of our town centres, such as ground floor residential and does not support 'out of town' retail uses.

Strategic Allocations: Land to the East of Abergavenny

Strategic Mixed-Use Development including:

- Residential
- Mixed use Neighbourhood Centre
- Park & Ride
- B Use Class Uses

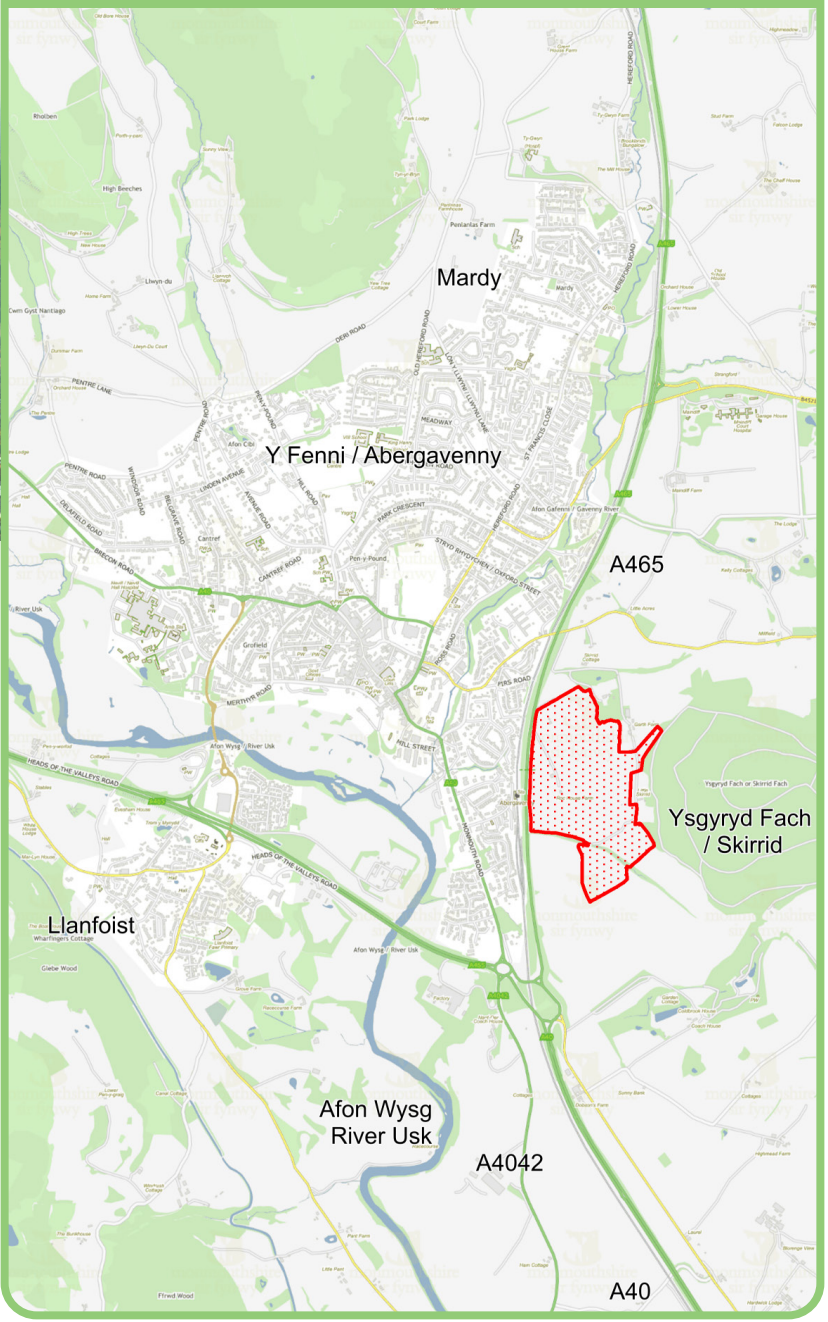
Land to the East of Abergavenny:
Circa 35.9 ha

Approx. No. of Total Homes: 500
Of which Open Market: 250
Of which Affordable Homes: 250

What this includes:

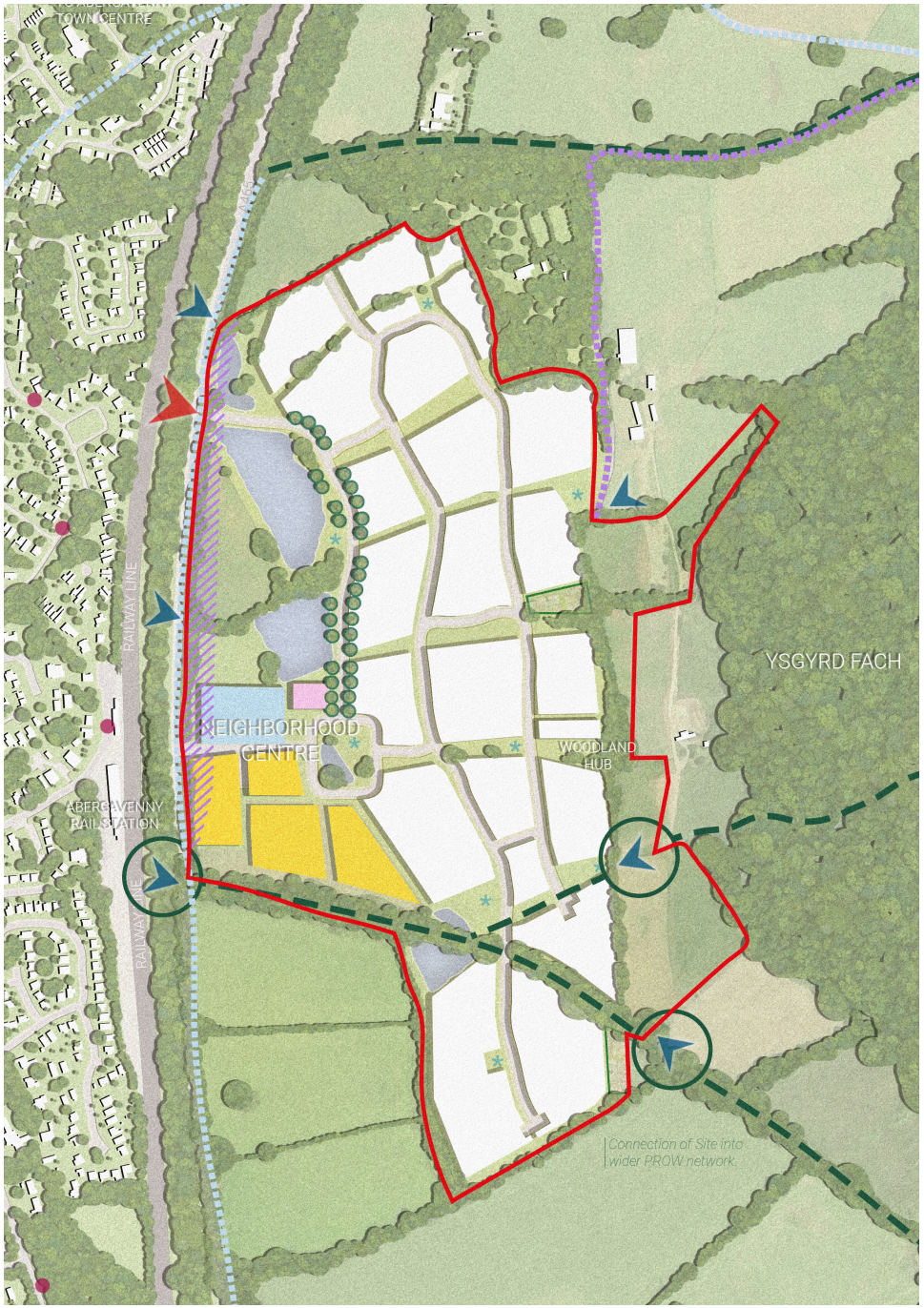
- This strategic site allocation is a sustainably located edge of settlement site. The site is located on the eastern edge of Abergavenny and is bordered by the A465 and railway line to its western boundary and the footslopes of the Ysgyryd Fach (Little Skirrid) to the east.
- The site will form an exemplar well-connected mixed-use urban expansion to Abergavenny containing a mix of residential uses alongside employment/commercial uses, associated facilities and services.
- The allocation represents the intended future direction of development in the Abergavenny area with the longer-term intention for further growth beyond the Plan period.
- Integrating the strategic site with the existing settlement is a key principle in the site's development. Identifying connection links that provide crossings across the railway line and the A465 is a key focus for the site.
- The site's western end plays an important role in integrating the new neighbourhood with the railway station and wider Abergavenny. It offers the potential to provide a 'community hub' serving both the urban extension and the railway station area, a park and ride facility for the railway station, and linkages to and from the allocation to the station and Abergavenny.

Site Location



Land to the East of Abergavenny

Indicative Masterplan



- REDLINE BOUNDARY
- RESIDENTIAL DEVELOPMENT
- NEIGHBOURHOOD CENTRE (including Community Buildings, Cycle Hire/ Parking and Electric Vehicle Charging)
- PROPOSED B1 ZONE
- PARK AND RIDE
- PROPOSED TREES
- VEHICULAR ACCESS
- PEDESTRIAN/ CYCLE ACCESS
- EXISTING TREES
- PROPOSED ACTIVE FRONTAGES
- PUBLIC RIGHT OF WAY
- PROPOSED ATTENUATION FEATURE
- PROPOSED PEDESTRIAN/ CYCLE ROUTE
- EMERGENCY SERVICE ACCESS
- EXISTING BUS STOP
- POTENTIAL PLAY AREA

Strategic Allocations: Land to the East of Caldicot/ North of Portskewett

Strategic Mixed-Use Development including:

- Residential
- Primary School
- Mixed use Neighbourhood Centre
- B1 Use Class Employment
- Strategic public open space

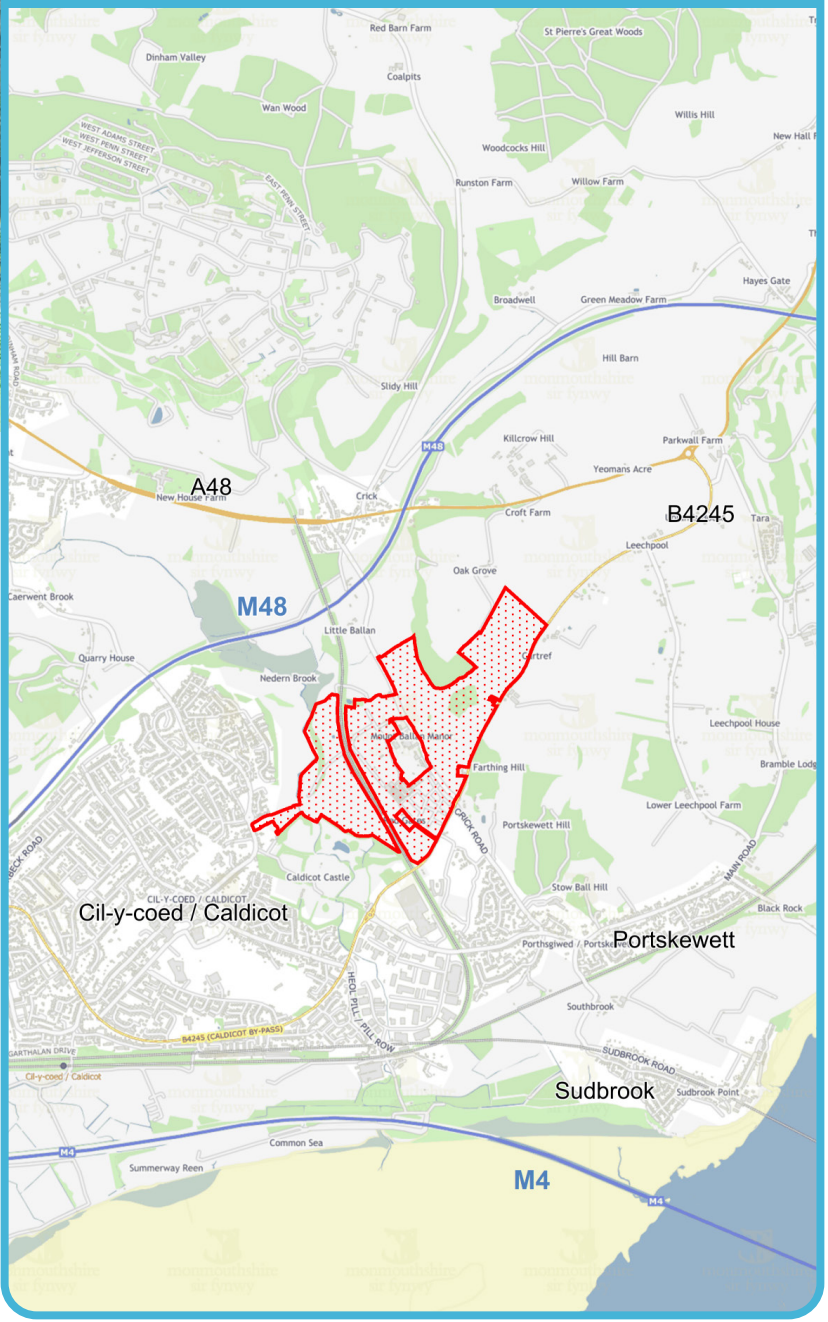
Land to the East of Caldicot:
Circa 64 ha

Approx. No. of Total Homes: 770
Of which Open Market: 385
Of which Affordable Homes: 385

What this includes:

- Land to the East of Caldicot/North of Portskewett is a sustainably located edge of settlement site. Development here will extend the settlement of Caldicot to the north-east, adjacent to the Crick Road, Portskewett site. Development will take place north of the Caldicot Castle Country Park, a Conservation Area and Area of Amenity Importance. No built development will take place in these sensitive areas.
- The site is located to the south of a council-owned solar farm, and opportunities to link the site with this renewable energy resource are being explored. The site includes previously developed land comprising a commercial equestrian centre, with much of the remainder being greenfield Council-owned land. The inclusion of such suitable land is supported by Future Wales Policy 3 which supports public leadership and the use of public land to deliver on ambitious affordable housing targets.
- The site will form a new neighbourhood of Caldicot with links to Portskewett to the south east. The primary school will benefit the wider community by serving the new development and the nearby homes in Caldicot and Portskewett. The school and the local centre will provide a key focal point of the site.
- Crick Road provides a central spine through the development and will be incorporated into the site as an active frontage, providing legibility for the community across the site. This will act as a gateway to the site as a whole and ensure the development of either side of the road is integrated cohesively. Permeability is key to enabling integration both within the site and the surrounding area.

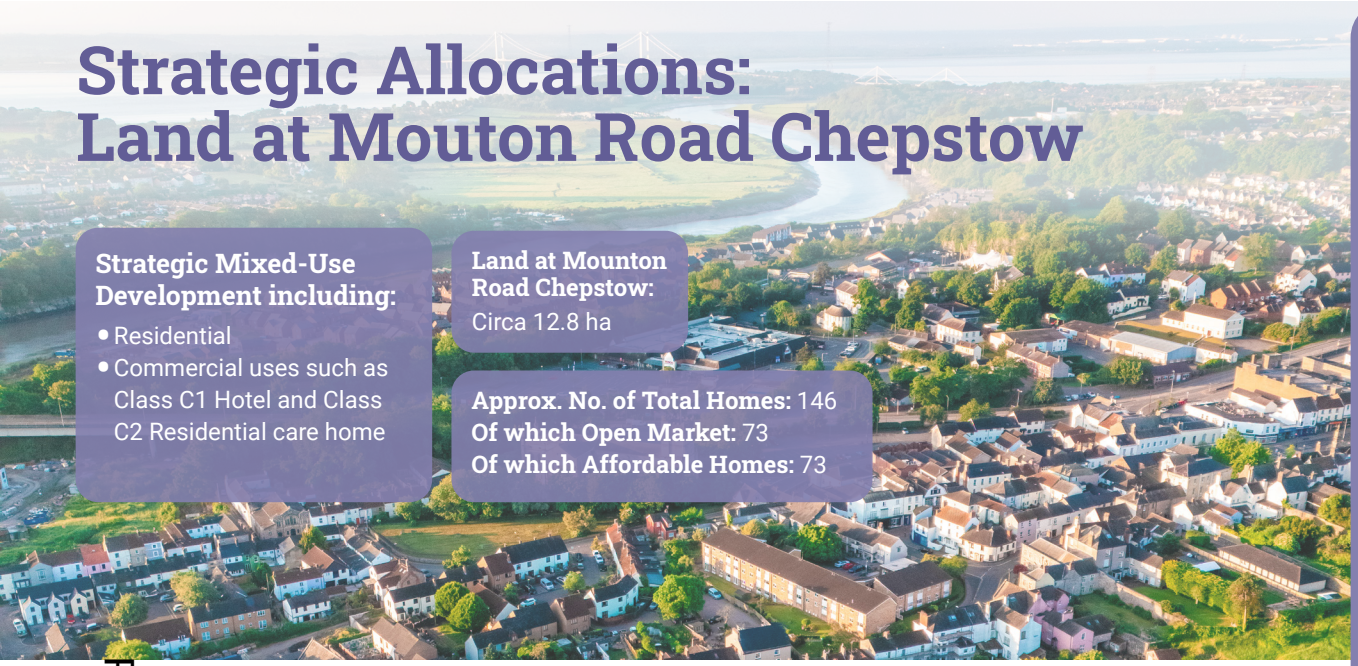
Site Location



Land to the East of Caldicot/ North of Portskewett

Indicative Masterplan

Strategic Allocations: Land at Mouton Road Chepstow



Strategic Mixed-Use Development including:

- Residential
- Commercial uses such as Class C1 Hotel and Class C2 Residential care home

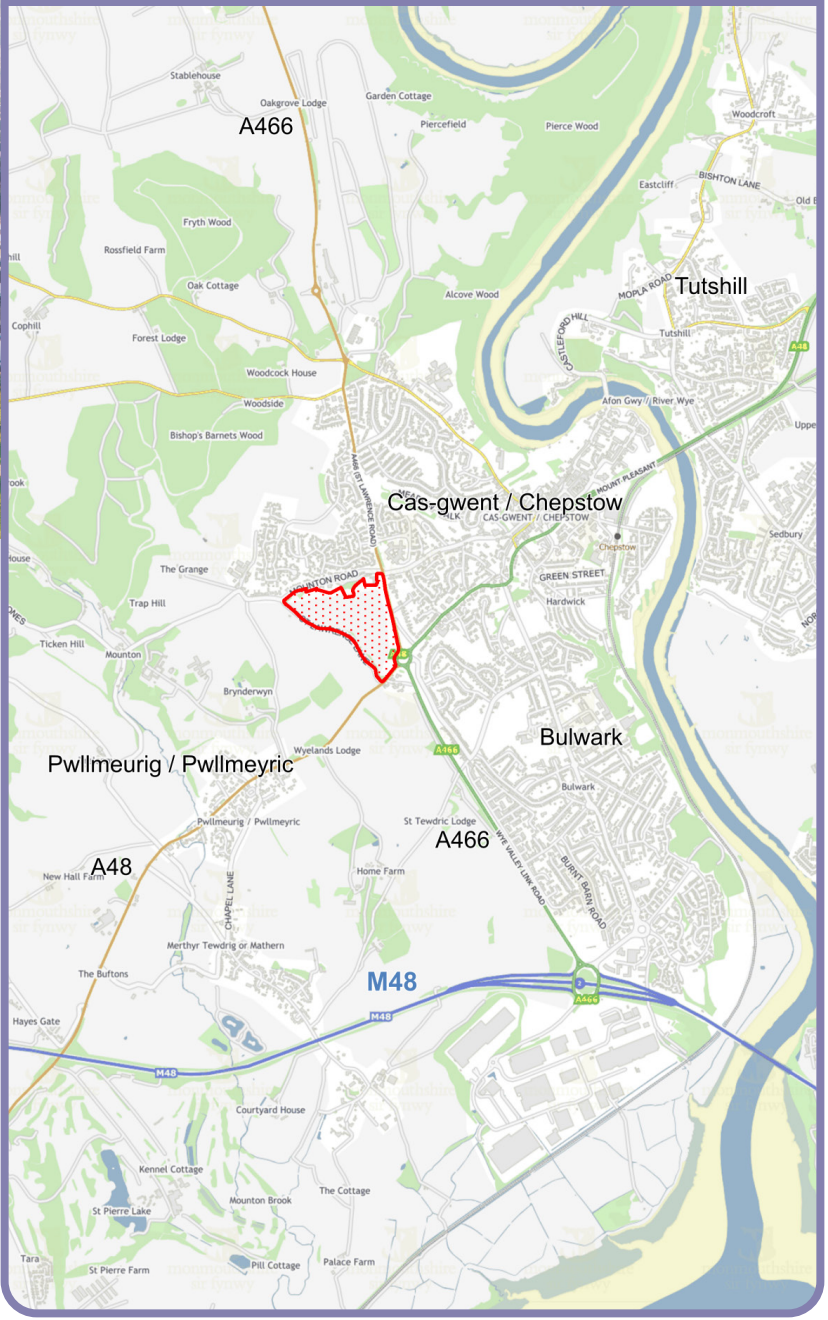
Land at Mounton Road Chepstow: Circa 12.8 ha

Approx. No. of Total Homes: 146
Of which Open Market: 73
Of which Affordable Homes: 73

What this includes:

- Land at Mounton Road is a sustainably located edge of settlement located to the western edge of Chepstow, west of the A466 (St Lawrence Road), north of the A48 and south of Mounton Road.
- The mixed-use development proposal, which includes a care home and hotel, provides a unique opportunity to locate homes and jobs together and boost Chepstow's local opportunities.
- Key considerations will be integrating the site with the existing settlement, identifying connection links and a design interface that provides crossings across the A466 and ensuring land is safeguarded for potential future improvements to the Highbeech Roundabout.
- The proposal will also be required to provide a publicly accessible community parkland that respects the setting of the nearby Grade II listed St Lawrence House and creates opportunities for recreation and leisure.

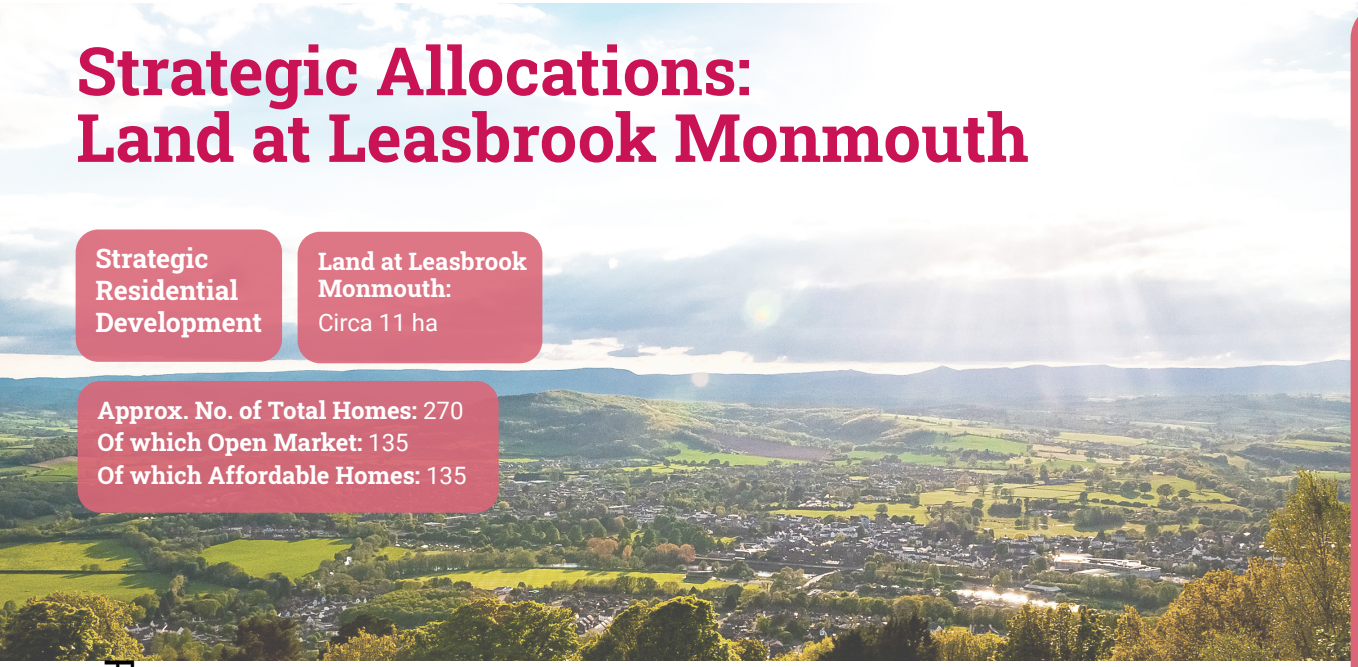
Site Location



Land at Mouton Road Chepstow

Indicative Masterplan

Strategic Allocations: Land at Leasbrook Monmouth



Strategic Residential Development

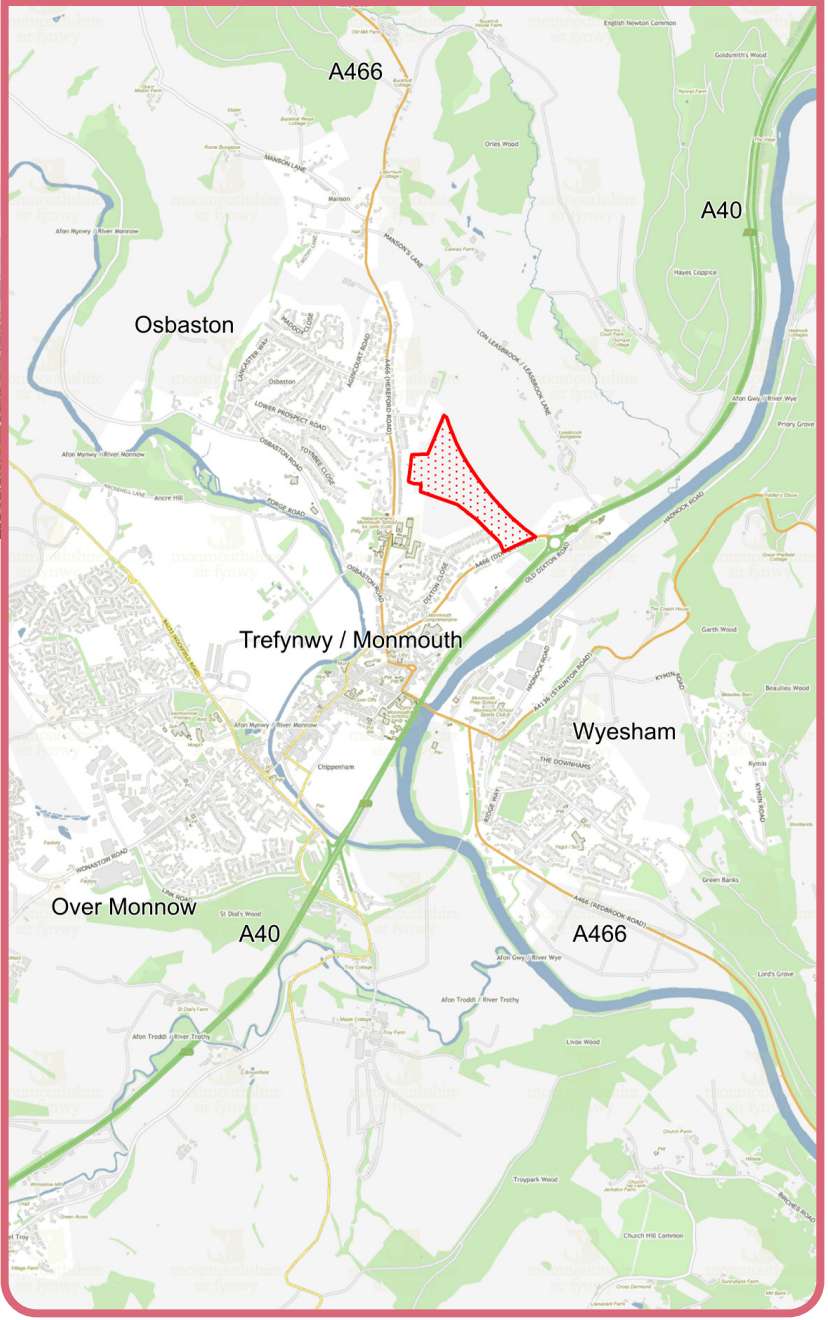
Land at Leasbrook Monmouth: Circa 11 ha

Approx. No. of Total Homes: 270
Of which Open Market: 135
Of which Affordable Homes: 135

What this includes:

- Land at Leasbrook is a sustainably located edge of settlement site, north of Dixton Road. The site is adjacent to developments at Dixton Close and Hereford Road, including Haberdashers' Monmouth School's playing pitches to the west.
- The site offers the opportunity to create an exemplar residential and GI-led development, which is important due to the gateway location of the site at the entrance to Monmouth from the north.
- Key considerations for the site's development include a footpath link to Dixton Close and along Dixton Road, allowing links to wider active travel links in Monmouth, and the need for an emergency secondary access onto Hereford Road.
- A green buffer is also required to minimise any potential landscape impact on the adjacent Dixton Conservation Area and the Lower Wye Valley Landscape of Historic Interest.

Site Location



Land at Leasbrook Monmouth

Indicative Masterplan

How the Plan will respond to our Climate Emergency?

To address and actively respond to one of our core issues - the **Climate Emergency** - the Deposit Plan contains several policies to tackle Climate Change.

Our supportive Climate Protection Policies

Climate Change (Strategic Policy S4) sets out the key ways the Plan will do this which includes locating development outside of flood risk areas, promoting energy efficiency through the design of buildings, using land efficiently to minimise the need to travel, providing ultra-low emission vehicles (ULEV) charging infrastructure and utilising sustainable construction techniques and local supplies where possible.

Net Zero Carbon Homes (Policy NZ1) requires that new homes be built to the highest energy efficiency standards, which are higher than the current Building Regulations standards. This includes space heating demand of less than 25KWh/m2/annum, energy consumption generated by renewables on the dwelling (or via the overall development), and new homes that cannot connect to the gas grid with all heating provided through low carbon heating systems.

Renewable Energy Allocation (Policy CC2) identifies land at Raglan Enterprise Park as having potential for ground mounted solar development within the county. This provides an opportunity to contribute to local and national renewable energy targets and potentially provide direct-access energy sources to adjoining existing and proposed employment uses.

Renewable Energy Generation (Policy CC3) includes Renewable Energy Targets and a supportive policy framework for new renewable energy generation schemes, such as ground mounted solar arrays, roof mounted solar panels, onshore wind and heat pumps. The policy and other protection policies within the Plan ensure renewable energy schemes have no unacceptable adverse impacts on Monmouthshire's landscape, historic features, biodiversity and residential amenities. It is made clear within the policies that renewable energy schemes are only acceptable if they do not compromise Monmouthshire's distinct identity.

Sustainable Transport (Policy S3) ensures development proposals are located and designed to reduce the need to travel and promote a shift away from the private car. The Policy promotes active travel, safe access and efficient capacity of the transport network and requires proposals to demonstrate solutions to rural transport issues when appropriate to do so. The policy, however, recognises that Monmouthshire is predominantly a rural county. While development is directed to the county's most sustainable settlements, the Plan also supports appropriate development within Monmouthshire's rural locations where the car is the only realistic mode of transport.

How the Plan will address our Nature Emergency?

The Deposit Plan contains numerous **protection policies** that will address Monmouthshire's **'Nature Emergency'** by protecting and enhancing Monmouthshire's special and unique spaces, landscapes and biodiversity.

Our supportive Nature Recovery and Protection Policies:

Green Wedge Designations (Policy GW1) protects land to avoid the coalescence of some of Monmouthshire's settlements, safeguards the countryside from encroachment and protects the setting of an urban area. Green Wedge designations have also been designated as buffers between the settlement edge of Abergavenny and the Bannau Brycheiniog National Park. The designations are set out on our Proposals Map.

Landscape Protection (Policies LC1, LC2, LC3, LC4, LC5) protect and enhance the unique landscape character of Monmouthshire, including our statutory landscapes Blaenavon Industrial Landscape World Heritage Site, Bannau Brycheiniog National Park, Wye Valley National Landscape (AONB) and our Dark Skies from light pollution.

Green Infrastructure (GI) (Policies, GI1, GI2) ensure the protection and enhancement of all of Monmouthshire's GI, which is defined as a network of green spaces that connect places. It includes landscape levels such as uplands, valleys, river corridors and coastlines, and local smaller levels such as woodlands, trees, hedges, parks and street verges.

Nature Recovery (Policies NR1, NR2, NR3) ensures the protection of locally* protected species, nature sites and water resources and sets out the requirement for **net benefit biodiversity gain,** whereby all proposals will need to demonstrate how they have improved biodiversity due to the development. Monmouthshire's Severn Estuary is to be protected from increased recreational pressure from activities such as dog walking.

**** National and International designations, such as Sites of Special Scientific Interest (SSSI) are protected with National Planning Policy***

Public Open space and Areas of Amenity Importance (AAI) designations (Policies C13, C14) protect these public spaces, including sports pitches, play areas, parks, informal green spaces, grasslands and woodlands. Areas of Public Open Space and AAIs are set out on the Proposals Map.

How will the Plan protect and enhance our distinctive built environment?

Monmouthshire is renowned for its distinctive identity and the high quality of its natural, historic and built environment. The Deposit Plan will protect and enhance Monmouthshire's built environment with placemaking policies that seek high quality design and place people, **natural resources and the natural environment at the heart of the design process**. This achievement will depend upon identifying and understanding the local characteristics which are distinctive to an area.

Placemaking and High Quality Design (Policies S3 ,PM1 and PM2) set out detailed criteria of how development will protect and enhance Monmouthshire's built environment by having a **green infrastructure-led approach** that respects local distinctiveness, incorporating a safe and inclusive design that offers access for all. All designs should be of high quality, respect existing surroundings, such as scale, height massing, and materials, and maintain reasonable levels of privacy and amenity for neighbouring occupiers.

Monmouthshire's Historic Environment

Monmouthshire has a rich built heritage and historic environment, which includes 31 Conservation Areas, 48 Historic Parks and Gardens, 3 Landscapes of Outstanding Historic Interest, approximately 164 Scheduled Ancient Monuments (SAMs) and 2,145 Listed Buildings. The preservation and enhancement of our historic assets are covered in the National Planning Policy.

The Plan contains local **Policies HE1 and HE2,** which set out Monmouthshire's specific guidance on protecting and enhancing our Conservation Areas in relation to their unique settings and distinctive qualities. **Policy HE3** protects and preserves our unique Roman Town of Caerwent settlement to ensure that the significant archaeological remains remain undisturbed and its historic open character is preserved.

Consultation Process

- A six-week consultation will take place on the Deposit Plan from 4th November 2024 – 16th December 2024.
- The consultation will allow the public and interested stakeholder to submit their views in writing to the Council. All representations received during the consultation will be recorded and reported to the Council.
- During the consultation period, we will hold virtual engagement and drop-in sessions in various locations across the county.
- For further information, please visit the Planning Policy Website: **www.monmouthshire.gov.uk/planning-policy**

APPENDIX 4

Integrated Sustainability Appraisal (ISA) for the Monmouthshire Replacement Local Development Plan

ISA Report accompanying the Deposit Plan - Non-Technical Summary

Monmouthshire County Council

September 2024

Delivering a better world

Quality information

Prepared by	Checked by	Verified by	Approved by
EH: Environmental Planner	CB: Principal Environmental Planner	NCB: Technical Director	NCB: Technical Director

Revision History

Revision	Revision date	Details	Name	Position
V1	September 2024	Final for submission	CB	Principal Environmental Planner

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Introduction

1. Introduction

1.1 AECOM is commissioned to lead on Integrated Sustainability Appraisal (ISA) in support of Monmouthshire County Council's Replacement Local Development Plan (RLDP). ISA fulfils the requirements and duties for Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA), Equalities Impact Assessment (EqIA), Health Impact Assessment (HIA), Welsh Language Impact Assessment (WLIA) and Well-being of Future Generations (WBFG).

1.2 ISA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives in terms of key sustainability issues. The aim of ISA is to inform and influence the plan-making process with a view to avoiding and mitigating negative impacts and maximising positive impacts. Through this approach, the ISA for the RLDP seeks to maximise the developing plan's contribution to sustainable development.

1.3 As identified above, the ISA seeks to fulfil the requirements and duties for SA, SEA, EqIA, HIA, WLIA and WBFG. The approach is to fully integrate these components to provide a single assessment process to inform the development of the RLDP. A description of each of the various components and their purposes is provided below.

1.4 The ISA Report[1] and this NTS are published alongside the Deposit Plan. They lead on from the Initial ISA Report published in November 2022, taking into consideration feedback from consultation and the subsequent updates to the RLDP. Any representations received will be considered when the Plan is finalised for submission.

1.5 ISA reporting essentially involves answering the following questions in turn:

- What has plan-making/ ISA involved up to this point?
  - Including in relation to 'reasonable alternatives'.
- What are the appraisal findings at this current stage?
  - i.e. in relation to the Deposit Plan.
- What happens next?
  - What steps will be taken to finalise (and monitor) the plan?

1.6 Each of these questions is answered in turn below. Firstly though there is a need to set the scene further by answering the questions i) What is the plan trying to achieve?; and ii) What is the scope of the SA?

What is the RLDP seeking to achieve?

1.7 Monmouthshire County Council (MCC) is in the process of preparing a Replacement Local Development Plan (RLDP) for the County (excluding the area within the Brecon Beacons National Park). The RLDP will cover the period 2018-2033 and will be the statutory land use plan to support delivery of

[1] See **Appendix I** for further explanation of the regulatory basis for answering certain questions within the SA Report; and a 'checklist' explaining more precisely the regulatory basis for presenting certain information.

the Council's purpose of becoming a zero-carbon County, supporting well-being, health and dignity for everyone at every stage of life.

1.8 The RLDP will set out land use development proposals for the County and will identify where and how much new development will take place over the Replacement Plan period. It will also identify areas to be protected from development and provide policies against which future planning applications will be assessed. The RLDP builds upon the current adopted LDP which covers the period 2011-2021.

Vision

1.9 The RLDP Vision outlines how the County is planned to develop, change, or be conserved up to 2033, and provides the framework for the Plan's strategy and policies. The Vision set out in the adopted LDP 2011-2021 has been reviewed and updated to take account of the issues, challenges and opportunities facing the County, key elements of the Gwent PSB Well-being Plan (August 2023) and MCC's Taking Monmouthshire Forward - Community and Corporate Plan 2022-2028 (April 2023).

By 2033 Monmouthshire will be home to well-connected, exemplar affordable housing-led, net zero carbon places that provide employment and support demographically balanced sustainable and resilient communities for all, where:

- **People are living in inclusive, equal, safe, cohesive, prosperous, and vibrant communities. Both urban and rural areas are well-connected with better access to local services and facilities, open space, and employment opportunities.**
- **Communities and businesses are part of an economically thriving, ambitious, and well-connected County.**
- **The best of the County's built heritage, countryside, biodiversity, landscape, and environmental assets have been protected and enhanced to retain its distinctive character.**
- **People enjoy healthier, more sustainable lifestyles with improved access to public transport and active travel opportunities and have a minimised impact on the global environment, supporting our ambitions for a zero-carbon County.**

Objectives

1.10 To address the key issues/ challenges and deliver the vision, 17 objectives have been developed for the RLDP, which build upon the Adopted LDP objectives. The objectives are kept under review and updated as necessary as part of the continued development of the RLDP evidence base.

1.11 The objectives are set out in **Table 1.1** overleaf and have been grouped to align with the 7 wellbeing goals set out in the Wellbeing of Future Generation (Wales) Act 2015, and the RLDP issues, as well as the main policy themes identified in Planning Policy Wales (PPW12), the Gwent PSB Wellbeing Plan steps, and the Council's Community and Corporate Plan.

Table 1.1: RLDP objectives and their contributions to wellbeing goals

RLDP Objective	Headline	RLDP Objective	RLDP issues addressed[2]	Main PPW12 theme	Gwent PSB Well-being Plan Steps	Community & Corporate Plan Objectives
A Prosperous Wales (Well-being Goal 1)						
Objective 1	Economic Growth/ Employment	To support a thriving, well-connected, diverse economy, which provides a range of good quality employment opportunities to enable and encourage indigenous business growth and attract inward investment and competitive innovative businesses in appropriate growth sectors, including through the provision of start-ups and grow on spaces.	1, 2, 3, 4, 5, 6, 7, 24	Productive and enterprising places	Take action to reduce the cost-of-living crisis in the longer term.	A Thriving and Ambitious Place.
Objective 2	Town and Local centres	To sustain and enhance the centres of Abergavenny, Caldicot, Chepstow, Magor, Monmouth, and Usk as vibrant and attractive centres serving the needs of their population and those of their surrounding hinterlands, and supporting adaptation to meet the needs of the evolving role of the high street.	8	Active and social places	Take action to address inequities, particularly in relation to health, through the framework of the Marmot Principles. Enable and support people, neighbourhoods,	A Thriving and Ambitious Place.

[2] See Appendix 1 of the Preferred Strategy for the full list of RLDP issues.

RLDP Objective	Headline	RLDP Objective	RLDP issues addressed[2]	Main PPW12 theme	Gwent PSB Well-being Plan Steps	Community & Corporate Plan Objectives
					and communities to be resilient, connected, thriving and safe.	
A Resilient Wales (Well-being Goal 2)						
Objective 3	Green Infrastructure, Biodiversity and Landscape	To protect, enhance and manage the resilience of Monmouthshire's natural environment, biodiversity and ecosystems and the connectivity between them, while at the same time maximising benefits for the economy, tourism, health, and well-being. This includes the Wye Valley National Landscape (AONB), the County's other high quality and distinctive landscapes, protected sites, protected species and other biodiversity interests.	11, 12, 35	Distinctive and natural places	Take action to reduce our carbon emissions, help Gwent adapt to climate change, and protect and restore our natural environment.	A Green Place to Live.
Objective 4	Flood risk	To ensure that new development takes account of the risk of flooding, both existing and in the future, including the need to avoid inappropriate development in areas that are at risk from flooding or that may increase the risk of flooding elsewhere and the need	12, 13	Distinctive and natural places	Take action to reduce our carbon emissions, help Gwent adapt to climate change, and protect and restore	A Green Place to Live.

RLDP Objective	Headline	RLDP Objective	RLDP issues addressed[2]	Main PPW12 theme	Gwent PSB Well-being Plan Steps	Community & Corporate Plan Objectives
		to design development, including the use of natural flood management measures to appropriately manage flood risk and surface water run-off.			our natural environment.	
Objective 5	Minerals and Waste	To meet the County's regional and local obligations to manage and dispose of its waste and to safeguard and exploit its mineral resource in a sustainable fashion.	14, 15	Productive and enterprising places	Take action to reduce our carbon emissions, help Gwent adapt to climate change, and protect and restore our natural environment.	A Green Place to Live.
Objective 6	Land	To promote the efficient use of land, including the need to: • maximise opportunities for development on previously developed land, whilst recognising that brownfield opportunities are limited in Monmouthshire. • protect the best and most versatile (BMV) agricultural land whilst at the same time recognising that this will not always be possible given high proportion of BMV land in the County and the limited opportunities for brownfield development.	16, 17	Strategic and spatial choices	Take action to reduce our carbon emissions, help Gwent adapt to climate change, and protect and restore our natural environment.	A Green Place to Live.

RLDP Objective	Headline	RLDP Objective	RLDP issues addressed[2]	Main PPW12 theme	Gwent PSB Well-being Plan Steps	Community & Corporate Plan Objectives
		• support the adaptation and re-use of existing sustainably located buildings.				
Objective 7	Natural resources	To ensure the efficient use of natural resources including providing increased opportunities for water efficiency, energy efficiency, renewable energy, recycling and waste reduction.	14, 15, 31, 37	Productive and enterprising places	Take action to reduce our carbon emissions, help Gwent adapt to climate change, and protect and restore our natural environment.	A Green Place to Live. A Safe Place to Live.
A Healthier Wales (Well-being Goal 3)						
Objective 8	Health and Well-being	To improve access for all to recreation, sport, leisure activities, open space, and the countryside and to enable healthier lifestyles. To support the Health Board to improve health infrastructure to meet community needs.	18, 20, 21, 33, 35	Active and social places	Take action to address inequities, particularly in relation to health, through the framework of the Marmot Principles.	A Fair Place to Live. A Safe Place to Live. A Connected Place Where People Care.
A More Equal Wales (Well-being Goal 4)						

RLDP Objective	Headline	RLDP Objective	RLDP issues addressed[2]	Main PPW12 theme	Gwent PSB Well-being Plan Steps	Community & Corporate Plan Objectives
Objective 9	Demography	To increase opportunities for the younger population to both live and work within Monmouthshire, creating a more balanced demography and socially and economically sustainable communities.	2, 3, 4, 5, 24	Active and social places	Enable and support people, neighbourhoods, and communities to be resilient, connected, thriving and safe.	A Fair Place to Live. A Thriving and Ambitious Place. A Safe Place to Live.
A Wales of Cohesive Communities (Well-being Goal 5)						
Objective 10	Housing	To provide urgently needed affordable housing within exemplar, mixed, sustainable, and well-connected places both for existing and future residents.	23, 25, 26, 27, 28	Active and social places	Provide and enable the supply and good quality, affordable, appropriate homes.	A Fair Place to Live. A Safe Place to Live.
Objective 11	Place-making	To create exemplar sustainable places through design, layout and mix of uses that enhance the character and identity of Monmouthshire's settlements and landscape; create attractive, safe, and accessible places to live, work and visit; and promote people's prosperity, health, happiness, and well-being.	1, 11, 12, 18, 20, 27, 28, 29, 30, 31, 32, 34, 35	Strategic and spatial choices	Enable and support people, neighbourhoods, and communities to be resilient, connected, thriving and safe.	A Thriving and Ambitious Place. A Safe Place to Live.

RLDP Objective	Headline	RLDP Objective	RLDP issues addressed[2]	Main PPW12 theme	Gwent PSB Well-being Plan Steps	Community & Corporate Plan Objectives
Objective 12	Communities	To ensure Monmouthshire is a connected place where people feel part of a community, are valued, and have good access to education, employment, shops, housing, public transport, active travel, healthcare, community and cultural facilities.	1, 5, 7, 8, 9, 18, 20, 25, 26, 27, 29, 30, 31, 33, 35	Strategic and spatial choices	Enable and support people, neighbourhoods, and communities to be resilient, connected, thriving and safe.	A Fair Place to Live. A Green Place. A Thriving and Ambitious Place. A Safe Place to Live. A Connected Place Where People Care. A Learning Place.
Objective 13	Rural Communities	To sustain existing rural communities as far as possible by providing affordable homes and development opportunities of an appropriate scale and location in rural areas in order to assist in building sustainable rural communities and strengthening the rural economy.	6, 7, 20, 22, 26, 29, 30, 34	Productive and enterprising places	Provide and enable the supply of good quality, affordable, appropriate homes.	A Fair Place to Live. A Safe Place to Live.
Objective 14	Infrastructure	To ensure that appropriate physical and digital infrastructure (including community and recreational facilities, education, sewerage, water, transport, health care and broadband etc.) is in	12, 19, 20, 31	Productive and enterprising places	Enable and support people, neighbourhoods, and communities to be resilient,	A Green Place to Live. A Thriving and Ambitious Place.

RLDP Objective	Headline	RLDP Objective	RLDP issues addressed[2]	Main PPW12 theme	Gwent PSB Well-being Plan Steps	Community & Corporate Plan Objectives
		place or can be provided to accommodate new development.			connected, thriving and safe.	A Connected Place Where People Care. A Learning Place.
Objective 15	Accessibility	To seek to reduce the need to travel by promoting a mix of land use allocations and improved internet connectivity, and where travel is required, to provide opportunities for active travel and integrated sustainable transport above use of the private car.	10, 30, 36	Active and social places	Enable and support people, neighbourhoods, and communities to be resilient, connected, thriving and safe.	A Green Place to Live. A Thriving and Ambitious Place.
Wales of Vibrant Culture & Thriving Welsh Language (Well-being Goal 6)						
Objective 16	Culture, Heritage and Welsh Language	To protect and enhance the built environment, culture and heritage of Monmouthshire for the future while maximising benefits for the economy, tourism and social well-being, including supporting and safeguarding the Welsh Language.	9, 32, 33, 34, 35	Distinctive and natural places	Enable and support people, neighbourhoods, and communities to be resilient, connected, thriving and safe.	A Fair Place. A Thriving and Ambitious Place. A Connected Place Where People Care.

RLDP Objective	Headline	RLDP Objective	RLDP issues addressed[2]	Main PPW12 theme	Gwent PSB Well-being Plan Steps	Community & Corporate Plan Objectives
						A Learning Place.
A Globally Responsible Wales (Well-being Goal 7)						
Objective 17	Climate and Nature Emergency	To strive to limit the increase in global temperatures to 1.5ºC, supporting carbon reduction through a variety of adaptation measures including facilitating resilient ecosystems and nature recovery, the use of renewable energy, net zero homes, the design and location of new development, encouraging balanced job and population growth to reduce out-commuting, the provision of broadband connectivity to reduce the need to travel, the provision of ultra-low emission vehicle charging infrastructure to reduce emissions and improve air quality, and the provision of quality green infrastructure.	10, 12, 36, 37, 38	Distinctive and natural places	Take action to reduce our carbon emissions, help Gwent adapt to climate change, and protect and restore our natural environment.	A Green Place to Live. A Thriving and Ambitious Place. A Safe Place to Live.

What is the scope of the ISA?

1.12 The scope of the ISA is essentially reflected in a list of sustainability objectives – grouped under ten ISA theme headings – established through scoping, considering context/ baseline review, identified key issues and responses from statutory consultees. Taken together, these ISA themes and objectives provide a methodological 'framework' for appraisal.

Table 1.2: ISA Framework

ISA theme	ISA objective
Economy and Employment	Deliver sustainable economic growth by strengthening the local economy, promote tourism and enhance the vitality and viability of town centres.
	Increase the range and quality of employment opportunities within Monmouthshire to meet identified needs.
Population and Communities	Provide a sufficient quantity of good quality housing in a range of types and tenures that allows people to meet their housing needs and supports economic growth and prosperity.
	Through place-making and sustainable design maintain and enhance the visual character and distinctiveness of the built environment to create great places to live. Support and promote the distinctive character of local communities.
Health and well-being	To improve physical and mental health and wellbeing by encouraging healthier lifestyles, quality living environments and community safety.
Equalities, diversity, and social inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.
Transport and Movement	To improve access for all to jobs, services and facilities in a way that reduces reliance on car use through improving infrastructure and promoting active travel, whilst also ensuring access to high quality digital communications and utilities.
Natural Resources (Air, Land, Minerals and Water)	To reduce all forms of air pollution in the interests of improving local air quality.
	To use land efficiently by prioritising development on previously developed land, using existing land efficiently and protecting where possible higher grade agricultural land.
	To ensure that primary materials and minerals are managed in a sustainable way, including through the implementation of a circular economy by waste reduction, re-use, and recycling.

ISA theme	ISA objective
	To maintain and improve the quality of ground, surface and coastal waters and the quantity of water available including potable water supplies, ground water and river levels.
Biodiversity and Geodiversity	To conserve, protect and enhance biodiversity and geodiversity within and surrounding Monmouthshire.
Historic Environment	To conserve and enhance the significance of the County's historic environment, cultural assets (including the use of the Welsh language) and heritage assets and their settings.
Landscape	To protect and enhance the quality and character of the best of Monmouthshire's landscape, including its contribution to the setting and character of settlements.
Climate Change	To promote and encourage energy generation from renewable sources and energy efficiency.
Flood Risk	Ensure that new development is designed and located to avoid the risk of flooding and ensure the risk of flooding is not increased elsewhere.

Part 1: What has plan-making/ ISA involved up to this point?

2. Plan-making/ ISA up to this point

2.1 A review of the LDP has been underway since 2018, with a wide range of evidence produced to inform plan-making. **Table 2.1** below sets out the key RLDP and ISA documents published to date, along with dates for consultation. The RLDP documents and the evidence base (including the ISA Reports) can be viewed and downloaded on the Council's website.[3]

Table 2.1: RLDP and ISA documents published to date

RLDP Documents and Consultation	ISA Documents and Consultation
	ISA Scoping Report 2018 - Sent to statutory consultees for consultation from 26th October to 30th November 2018.
Issues, Vision, and Objectives Paper (January 2019 as amended June 2021)	
Growth and Spatial Options Consultation Paper - Public consultation from July to August 2019	
Preferred Strategy Public consultation from 09 March to 22 April 2020 (Consultation paused due to Covid-19. Consultation was ceased following advice from the Minister for Housing and Local Government (7th July 2020)	Initial ISA Report and NTS 2020 Public consultation from 09 March to 22 April 2020 (Consultation paused due to Covid-19. Consultation was ceased following advice from the Minister for Housing and Local Government (7th July 2020))
RLDP Review of Issues, Vision, Objectives and Evidence Base in light of Covid-19 (September 2020) This Review was agreed by Council on 22 October 2020 and submitted to the Welsh Government in accordance with Ministerial advice	
Revisited RDLP Growth and Spatial Options Consultation Paper Public consultation from January to February 2021	ISA of Strategic Options Report 2021 Public consultation January to February 2021
Sustainable and Resilient Communities Preferred Strategy Public consultation from July to August 2021	Initial ISA Report and NTS 2021 Public consultation from July to August 2021
Preferred Strategy, December 2022 Public consultation from December 2022 to January 2023	Initial ISA Report and NTS 2022 Public consultation from December 2022 to January 2023

[3] Replacement Local Development Plan (RLDP) - 2018-2033 - Monmouthshire

2.2 With a number of Initial ISA Reports published to date, this part of the NTS sets out the work that has been undertaken to develop and appraise reasonable alternatives, considering feedback from consultation at each stage and subsequent changes to the preferred strategy.

2.3 This includes how reasonable alternatives have been established considering the available evidence and feedback from consultation; a summary of the appraisal of reasonable alternatives; whilst **Chapter 3** explains the Council's reasons for selecting the preferred approach.

Establishing the reasonable alternatives

Level of growth

Level of growth options (2020)

2.4 In early development stages of the RLDP, Monmouthshire, Torfaen, and Blaenau Gwent County Councils jointly commissioned Edge Analytics to prepare a range of demographic, housing, and employment growth scenarios to inform the RLDP. A total of 20 different demographic-led, housing-led, and employment-led scenarios were generated for Monmouthshire. From these, eight growth options were selected for consultation, comprising of 2 low, 3 medium, and 3 high growth options, as set out in the Growth and Spatial Options Paper (June 2019), which was published for consultation from July to August 2019.

2.5 The Council took time to consider these options, consultation responses received, and informal feedback from Welsh Government officials; which indicated a lack of confidence in economic-led projections and a concern regarding ambitious LDPs. A decision was subsequently taken to commission Edge Analytics to model an additional demographic-led scenario. This scenario sought to address two of the key issues/ challenges facing the County in relation to retaining/ attracting younger adult population age groups and improving labour force retention.

2.6 The eight growth options identified in the June 2019 Consultation Paper together with the additional scenarios modelled by Edge Analytics (Growth Option 5A and Option 5A+) were assessed through the ISA in early 2020. For the purposes of the ISA process, the ten growth options were grouped together into three distinct options (Option 1 (Low Growth), Option 2 (Medium Growth), and Option 3 (High Growth)) to allow for a proportionate and meaningful appraisal to be carried out. An appraisal of the three grouped options were presented in the Initial ISA Report and consulted upon in March 2020.

Level of growth options (2021)

2.7 The Council revisited the Growth and Spatial Options stage of the RLDP process later in 2020 due to the publication of updated key evidence. Namely, in August 2020 the Welsh Government published corrected 2018-based population and household projections.

2.8 The latest Welsh Government local authority level Household Projections for Wales, alongside the latest Local Housing Market Assessment (LHMA) and the Well-being plan for a plan area, form a fundamental part of the RDLP evidence base. These were considered together with other key evidence in relation to

issues such as what the plan is seeking to achieve, links between homes and jobs, the need for affordable housing, Welsh language considerations and the deliverability of the plan, in order to identify an appropriate strategy for the delivery of housing in the plan area.

2.9 The 2020 publication of corrected Welsh Government 2018-based population and household projections comprised important new evidence that required consideration to ensure that the evidence base for the RLDP is robust and based on the most up to date information.

2.10 To take account of the latest evidence, an Updated Demographic Evidence Report (November 2021) was prepared by Edge Analytics, which set out a range of updated growth options for the RLDP.[4]

2.11 A total of fourteen different scenarios were generated for Monmouthshire, together with further sensitivity testing for all of the demographic and dwelling-led scenarios with regard to household formation and commuting ratios. From these fourteen different scenarios, six growth options were selected for further testing through the ISA. In addition to the initial modelling, all six selected options were the subject of additional testing to establish the impact on demography, dwellings, and household formation and employment of an affordable-housing policy-led strategy.

2.12 The six growth options identified in the Growth and Spatial Options Paper (December 2020) were assessed through the ISA in early 2021. The assessment of these options was presented in the Initial ISA Report which accompanied the consultation on the 'Sustainable and Resilient Communities Preferred Strategy' in Summer 2021.[5]

Level of growth options (2022)

2.13 Following consultation on the Preferred Strategy in 2021, a number of challenges arose which impacted on the progression of the RLDP and required further consideration. In terms of the level of growth, Welsh Government (WG) raised significant concerns regarding the proposed level of growth and the Strategy's 'general conformity' with policies 1 and 33 of Future Wales: The National Plan 2040. This suggested that growth in Monmouthshire would undermine growth in the national growth area of Cardiff, Newport, and the Valleys.

2.14 WG's consultation response took the unprecedented step of prescribing a maximum growth of 4,275 dwellings for Monmouthshire to 2033. This is considerably lower than the Preferred Strategy dwelling requirement that was consulted on (7,605 dwellings) and would result in barely any new housing allocations over RLDP period due to the existing housing landbank.

2.15 MCC considered that this approach would fail to deliver on key locally evidenced issues and objectives including affordable housing delivery, economic growth/prosperity and rebalancing the demography, to the detriment of the sustainability of the County's communities. MCC also felt it would fail to accord with policies 4, 5 and 7 of Future Wales: The National Plan 2040, which

[4] https://www.monmouthshire.gov.uk/planning-policy/development-of-an-evidence-base/
[5] AECOM (2021) ISA for the Monmouthshire Replacement Local Development Plan https://www.monmouthshire.gov.uk/app/uploads/2021/07/Monmouthshire-Initial-ISA-Report-NTS-June-2021.pdf

specifically support rural communities and seek to increase the delivery of affordable homes throughout Wales.

2.16 On 14th December 2021, a special meeting of the Council's Economy and Development Select Committee considered the implications of the WG Planning Division's response on Monmouthshire's communities and on addressing the locally evidence-based outcomes and objectives.

2.17 MCC considered that the WG letter poses a significant challenge for the Preferred Strategy. Namely, that an amended RLDP that follows the letter's requirements would not meet the tests of soundness at examination because it would not address the evidence-based issues or achieve the required outcomes. Conversely, proceeding as originally proposed would also be a high-risk strategy.

2.18 Consequently, MCC considered revised growth options which support lower dwelling requirements. These options were subject to appraisal in the Initial ISA Report 2022, alongside the growth strategy consulted on in 2021. These options are summarised below:

- **Option 1**: Existing Preferred Strategy growth level of 7,605 new dwellings over the entire plan period alongside the creation of 7,215 new jobs.
- **Option 2**: Demographic led strategy growth level of 5,400 new dwellings over the entire plan period alongside the creation of 6,240 new jobs.
- **Option 3**: WG prescribed growth level of 4,280 new dwellings over the entire plan period alongside the creation of 4,290 new jobs.

Feedback from consultation and level of growth options in 2024

2.19 In 2022, the Council's preferred approach was Option 2 as this would reduce the level of growth proposed compared to the 2021 Preferred Strategy which WG objected to, whilst also ensuring that the RLDP delivers on the Council's objectives and addresses the core issues of delivering much needed affordable housing and retaining young people with access to new jobs.

2.20 At this stage (in 2024) no new evidence has emerged or is being considered that changes the alternatives developed in 2022 and these three options remain valid and up to date for the purposes of this ISA Report. The summary of the appraisal of these options is presented in Chapter 6.

Location of growth

Location of growth options (2020)

2.21 A total of eight Spatial Options were initially considered and included in the long list of spatial options (set out in Appendix 4 of the Growth and Spatial Options Consultation Paper, July 2019) but three were discounted prior to consultation as they were not considered to be genuinely realistic options. Accordingly, five spatial options were consulted on as part of the Growth and Spatial Options Consultation. Subsequent to this, as with the growth options, two additional spatial options were identified in light of consultation responses and emerging national policy at the time. Following on from this, a total of seven spatial options were considered through the ISA process in early 2020.

Location of growth options (2021)

2.22 As highlighted above, the Council revisited the Growth and Spatial Options stage of the RLDP process in 2020 following the publication of the corrected Welsh Government 2018-based population and household projections (August 2020). The RLDP spatial options considered in 2020 were reassessed to identify suitable options for consideration as part of this process. Two of the options considered in the 2020 consultation included a new settlement. These options were subsequently discounted as the Welsh Government deemed them contrary to national policy set out in PPW (Edition 11), which states new settlements should only be proposed as part of a joint LDP, SDP or the NDF. An additional option, focusing growth in the north of the County, was subsequently included as a result of consultation responses on the 2020 Growth and Spatial Options.

2.23 A total of four broad Spatial Distribution Options were therefore taken forward as realistic options for ISA in 2021 which explored a continuation of the existing LDP strategy, proportionately distributed growth, growth focused on the M4 corridor, and growth focused in the north of the County. The assessment of these options was presented in the Initial ISA Report which accompanied the consultation on the 'Sustainable and Resilient Communities Preferred Strategy' in Summer 2021.[6]

Location of growth options (2022)

2.24 Following consultation on the Preferred Strategy in 2021, a number of challenges arose which impacted on the progression of the RLDP and require further consideration. In terms of the spatial strategy, this specifically referred to the environmental impacts of phosphate in watercourses.

2.25 In light of new evidence, Natural Resources Wales (NRW) adopted tighter targets for the water quality of watercourses and conducted an assessment of the nine riverine Special Areas of Conservation (SAC) in Wales. This assessment established that phosphorus breaches are widespread within Welsh SAC rivers with over 60% of waterbodies failing against the new targets. Within Monmouthshire, NRW identified that within the River Usk, 88% of the river's water bodies failed to meet the required target and within the River Wye, 67% of the river's water bodies failed to meet the required target.

2.26 In response, NRW issued detailed planning guidance to ensure that the environmental capacity of the rivers does not deteriorate any further. Any proposed development within the affected catchment areas of the rivers Usk and Wye that might increase phosphate levels need to clearly evidence that the development can demonstrate phosphate neutrality or betterment in its design and/ or its contribution to the water body. This issue affects the upper (non-tidal) parts of the two rivers.

2.27 The phosphates water quality issue affecting the River Wye and River Usk had implications for the progression of the RLDP as the Preferred Strategy that was consulted on in 2021 directed future growth to a number of key sustainable settlements within these affected catchment areas. Further consideration was,

[6] AECOM (2021) ISA for the Monmouthshire Replacement Local Development Plan https://www.monmouthshire.gov.uk/app/uploads/2021/07/Monmouthshire-Initial-ISA-Report-NTS-June-2021.pdf

therefore, given as to how the RLDP can progress in light of this issue, carefully balancing the need for growth with the climate and nature emergency.

2.28 Following discussions with Dŵr Cymru/ Welsh Water (DCWW) and NRW, MCC realised that whilst a workable solution to this water quality issue is achievable for the Llanfoist Waste Water Treatment Works (WWTW) (River Usk catchment), there was no identified strategic solution for phosphate mitigation at the Monmouth WWTW (River Wye catchment) in 2022 that could be implemented during the Plan period.

2.29 Without an identified deliverable solution, it would not be possible to demonstrate at examination that sites in the Upper Wye Catchment are deliverable. This means that new site allocations for future growth could not be directed to settlements within the affected Wye catchment area, including the primary settlement of Monmouth, until a feasible solution is identified that can be implemented within a timescale that facilitates development within the Plan period. The restrictions on new housing and employment development in this area during the Plan period had obvious implications for the RLDP spatial strategy.

2.30 Consideration was therefore given to how to progress the RLDP having regard to the above challenges, whilst also ensuring that the RLDP delivers on the Council's objectives and core issues.

2.31 MCC subsequently developed a spatial option which did not direct growth to settlements within the affected Wye catchment area, including the primary settlement of Monmouth. This option, alongside the spatial strategy consulted on in 2021, were subject to appraisal in the Initial ISA Report 2022. The two options are summarised below:

- **Option 1**: Distribute growth proportionately across the County's most sustainable settlements.
- **Option 2**: Focus growth in the County's most sustainable settlements of Abergavenny, Chepstow, and Caldicot, including Severnside, supported by lower growth in the most sustainable rural settlements (excluding those settlements in the Upper Wye catchment area).

Strategic growth areas

Strategic growth areas (2022)

2.32 In 2020, the Council identified potential strategic growth areas for each of the Primary Settlements and Severnside. To inform these possible strategic growth areas a preliminary high-level assessment of sites submitted during the Initial Call for Candidate Sites was undertaken by the Council to identify those sites which could contribute to delivering the level of growth (housing and jobs) required to deliver the Preferred Strategy. Only strategic sites and sustainable urban extensions of around 8ha in size and above were considered.

2.33 The identified strategic growth areas were considered by the Council to have the potential to underpin the Spatial Strategy, by accommodating growth and focusing development within those settlements and areas which are identified as the most sustainable locations.

2.34 The potential strategic growth options were assessed through the Initial ISA Report 2021 and reproduced in the Initial ISA Report 2022. The strategic growth options were located in Abergavenny and Llanfoist, Chepstow, Monmouth, and Severnside.

Feedback from consultation and location of growth options in 2024

2.35 Since 2022, DCWW have identified strategic improvements at the Monmouth Wastewater Treatment Works that can be implemented by 31st March 2025 which has provided WG with sufficient certainty to allow for new growth allocations in the Upper Wye Catchment, including at Monmouth. On this basis, there is no need to continue to assess or develop options that avoid growth in settlements in the Upper Wye Catchment area. The four options developed for ISA in 2021 are therefore considered to be representative of the choices available to the Council at this stage, supported by an assessment of the strategic growth locations which remain the same as reported on in 2021 and 2022.

Summary of options (2024)

2.36 In summary, the discussion in this chapter has identified no new options for assessment at this stage, and previously assessed options are reproduced as the representative choices for the Council in terms of their preferred approach and reasonable alternatives. The choices that are taken forward for assessment in Chapter 6 are:

Level of growth

- **Option 1**: Existing Preferred Strategy growth level of 7,605 new dwellings over the entire plan period alongside the creation of 7,215 new jobs.
- **Option 2**: Demographic led strategy growth level of 5,400 new dwellings over the entire plan period alongside the creation of 6,240 new jobs.
- **Option 3**: WG prescribed growth level of 4,280 new dwellings over the entire plan period alongside the creation of 4,290 new jobs.

Location of growth

- **Option 1**: Continuation of the existing LDP Strategy – distributing growth around the County with a particular focus on Main Towns, with some development in Severnside and some development in the most sustainable rural areas.
- **Option 2**: Proportionately distributed growth – growth would be distributed across the County's most sustainable settlements with the level of growth proportionate to that settlement's size and existing amenities, as well as the identified affordable housing need and capacity for growth.
- **Option 3**: Growth focused on the M4 corridor – focusing growth in the south of the County in the Severnside area close to the M4/ M48, to capitalise on its strategic links to the Cardiff Capital Region and South West England.
- **Option 4**: Growth focused in the north of the County – focusing growth in most sustainable settlements in the north of the County to capitalise on its strategic links to the Heads of the Valleys and wider Cardiff Capital Region via the A465, and towards Herefordshire via the A449 and A40.

Strategic growth locations

- **Abergavenny and Llanfoist**:
  - **Option A**: Land north of Abergavenny.
  - **Option B**: Land to the east of the A465; and
  - **Option C**: Land between the B4246 and Heads of the Valleys Road.
- **Chepstow**:
  - **Option D**: Land north of the Bayfield Estate.
  - **Option E**: Land between the Bayfield Estate and A48; and
  - **Option F**: Land between the A48 and M48.
- **Monmouth**:
  - **Option G**: Land west of Monmouth.
  - **Option H**: Land in central Monmouth; and
  - **Option** I: Land north-east of Monmouth.
- **Severnside**:
  - **Option J**: Land north-east of Caldicot.
  - **Option K**: Land north-west of Caldicot.
  - **Option L**: Land west of Caldicot/ east of Rogiet; and
  - **Option M**: Land east of Caerwent.

Appraising the reasonable alternatives

2.37 The strategic options identified above were subject to a comparative appraisal under each ISA theme and the detailed findings are presented below.

2.38 For each of the strategic options, the assessment has examined likely significant effects on the baseline, drawing on the sustainability objectives and themes identified through scoping (see **Table 2.1**) as a methodological framework. Based on the evidence available a judgement is made if there is likely to be a significant effect. Where it is not possible to predict likely significant effects based on reasonable assumptions, efforts are made to comment on the relative merits of the alternatives in more general terms and to indicate a rank of preference. The number indicates the rank and does not have any bearing on likely significant effects. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of 'significant effects'. For example, if an option is ranked as 1 then it is judged to perform better against that ISA theme compared to an option that is ranked 2 or 3 or so on.

Level of growth

2.39 The three growth level options were subject to a comparative appraisal under each ISA theme and the summary findings are presented overleaf.

Table 2.2: Summary findings for level of growth options

ISA theme	Rank/ significant effects	Option 1	Option 2	Option 3
Economy and employment	Rank	1	2	3
	Significant effect?	Yes - positive	Yes - positive	No
Population and communities	Rank	1	2	3
	Significant effect?	Yes - positive	Yes - positive	No
Health and wellbeing	Rank	1	2	3
	Significant effect?	Yes - positive	Yes - positive	No
Equalities, diversity, and social inclusion	Rank	1	2	3
	Significant effect?	Yes - positive	Yes - positive	No
Transport and movement	Rank	1	2	3
	Significant effect?	No	No	No
Natural resources (air, land, minerals, and water)	Rank	3	2	1
	Significant effect?	Uncertain	Uncertain	Uncertain
Biodiversity and geodiversity	Rank	3	2	1
	Significant effect?	Uncertain	Uncertain	Uncertain
Historic environment	Rank	3	2	1
	Significant effect?	Uncertain	Uncertain	Uncertain

ISA theme	Rank/ significant effects	Option 1	Option 2	Option 3
Landscape	Rank	3	2	1
	Significant effect?	Uncertain	Uncertain	Uncertain
Climate change (including flood risk)	Rank	1	2	3
	Significant effect?	No	No	No

2.40 For ISA themes relating to natural resources, biodiversity, the landscape, and historic environment; the nature and significance of effects will be dependent on where growth is located and how development is designed/ implemented. As the level of growth increases so does the likelihood that impacts will occur, and negative effects will arise. Residual effects in this respect are uncertain and will be better informed by consideration of the location of growth, the sensitivity of receptors in these areas, and the potential mitigation measures available. The lowest growth option (Option 3) is ultimately ranked most favourably in respect of the potential environmental impacts, though it is also recognised that higher levels of development proposed through Option 1, followed by Option 2, have further potential to deliver environmental enhancements/ improvements that could lead to positive effects.

2.41 At this stage there is no evidence to conclude that the higher levels of growth would result in a significant negative effect on biodiversity/ geodiversity, the landscape and historic environment (in the absence of known development locations). However, given the limited brownfield resource in the County, development is likely to be primarily delivered through settlement expansion on greenfield land, with residual negative effects likely. The significance of the effects is likely to increase as the level of growth increases. There is uncertainty in terms of impact on important mineral resources and agricultural land until the location of growth is more defined.

2.42 Similarly, for the transport ISA theme, Options 1 and 2 proposing a higher level of growth are more likely to result in impacts on the local road network through increased traffic and congestion; however, no evidence suggests impacts are likely to be of significance. Recent increases in homeworking because of the pandemic is considered likely to prevail as a longer-term trend which will continue to support reduced congestion. Further, higher growth presents an increased potential to deliver accessibility and infrastructure improvements and result in more self-contained communities. This could lead to reduced levels of out commuting and modal shift, the importance of which have all been highlighted during the pandemic. As a result, higher growth Option 1, followed by Option 2, are ranked more favourably than Option 3 overall.

2.43 Option 3 is noted for potential negative effects in relation to the ISA themes of economy and employment, population and communities, health and wellbeing, and equalities, diversity, and social inclusion. However, there is a level of uncertainty, with effects unlikely to be significant in most cases. Particular concern relates predominantly to limited growth restricting opportunities to address a likely resultant demographic imbalance, which in turn would not support sustainable economic growth. Under this option, limited opportunities for the younger population to live and work in the County would negatively impact communities, exacerbating inequality and rural isolation. This is particularly relevant to certain groups with protected characteristics, such as the young, elderly, and disabled, who tend to be disproportionately affected by accessibility issues and the negative effects of transport infrastructure. Further, under Option 3 there would be a limited opportunity to secure additional market or affordable housing, limiting the range and choice of homes (housing mix) which could drive up house prices and exacerbate affordability issues.

2.44 High growth Option 1 is identified as best performing against ISA themes relating to the economy and employment, population and communities, health/ wellbeing and equalities as the additional growth provides an opportunity to

deliver a greater range of new housing, employment opportunities and community infrastructure to meet the needs of the County. Option 2 performs slightly less positively than Option 1 given the level of growth proposed is less, however similar positive effects are predicted under this Option, providing a more balanced demographic and more sustainable communities than predicted under Option 3.

Spatial strategy

2.45 The four spatial strategy options were subject to a comparative appraisal under each ISA theme. The summary findings are presented overleaf.

Table 2.3: Summary findings for location of growth options

ISA theme	Rank/ significant effects	Option 1	Option 2	Option 3	Option 4
Economy and employment	Rank	1	1	2	2
	Significant effect?	Yes - Positive	Yes - Positive	Uncertain	Uncertain
Population and communities	Rank	1	1	2	2
	Significant effect?	Yes - Positive	Yes - Positive	Uncertain	Uncertain
Health and wellbeing	Rank	1	1	3	2
	Significant effect?	Yes - Positive	Yes - Positive	Uncertain	Uncertain
Equalities, diversity, and social inclusion	Rank	1	1	2	2
	Significant effect?	Yes - Positive	Yes - Positive	Uncertain	Uncertain
Transport and movement	Rank	1	1	2	3
	Significant effect?	Uncertain	Uncertain	Uncertain	Uncertain
Natural resources (air, land, minerals, and water)	Rank	1	1	3	2

ISA theme	Rank/ significant effects	Option 1	Option 2	Option 3	Option 4
	Significant effect?	Yes - Negative	Yes - Negative	Yes - Negative	Yes - Negative
Biodiversity and geodiversity	Rank	3	3	1	2
	Significant effect?	Yes – Negative	Yes - Negative	Uncertain	Yes - Negative
Historic environment	Rank	=	=	=	=
	Significant effect?	Uncertain	Uncertain	Uncertain	Uncertain
Landscape	Rank	2	2	1	2
	Significant effect?	Uncertain	Uncertain	Uncertain	Uncertain
Climate change (including flood risk)	Rank	2	2	1	2
	Significant effect?	Uncertain	Uncertain	Uncertain	Uncertain

2.46 The appraisal found that there is little to differentiate between the options at this stage regarding the historic environment ISA theme. This is given that all options have the potential to result in negative effects by directing development to areas that are sensitive in terms of heritage constraints, albeit in different areas of the County. However, it is recognised that mitigation could be provided, and that development also has the potential to deliver positive effects environmental improvement/ enhancement measures secured at the project scale. The nature and significance of effects will be dependent on the precise scale and location of development.

2.47 Similar conclusions can also be drawn in relation to biodiversity given the presence of international, national, and local designations throughout the County, though options can be differentiated between in relation to nutrient neutrality implications on the River Wye and River Usk SACs. Whilst solutions are available the options are ranked according to the mitigation requirements. Options 1 and 2, which direct growth to these Primary Settlements (followed by Option 4), therefore are worst performing overall.

2.48 In terms of the landscape and climate change themes, Option 3 directs development to areas of lower flood risk and that are less sensitive in landscape terms and is therefore considered to perform better compared to the other options. All other options focus development in areas that are of high flood risk (though it is anticipated that high flood risk areas would be avoided in line with national policy and sequential testing) and near landscape designations with a higher likelihood of negative effect arising. Given that the precise location of growth is not known, and further evidence base work is being carried out around landscape sensitivity, all of the options are found to have uncertain effects in relation to the landscape and climate change themes.

2.49 In terms of natural resources, it is difficult to identify any significant differences between the options in relation to water resources and quality. Options 1, 2 and 4, are best performing in terms of utilising brownfield land and protecting Best and Most Versatile (BMV) agricultural land and ensuring that air quality is not reduced throughout the County. However, it is recognised that there are limited opportunities for the regeneration of brownfield land so ultimately most growth will be on greenfield and potentially agricultural land. Option 3 performs less well given it may also lead to the loss of significant greenfield/ BMV land and has the potential to adversely impact upon the Limestone Mineral Safeguarding Area present to the south of the County. All the Options have the potential for a significant negative effect against the natural resources theme through the potential loss of BMV agricultural land, although it is acknowledged that there is an element of uncertainty at this stage until the precise location of development is known.

2.50 Options 1 and 2 perform more positively and are found to have the potential for significant long term positive effects against ISA themes relating to population/ communities, health/ wellbeing, economy/ employment, and equalities compared to the other options. They focus growth at the most sustainable Settlements where there is greater need and better access to public transport, existing employment, and facilities/ services. The importance of high levels of local accessibility to open space, services and facilities have been highlighted through the current pandemic. It should be noted that there are some small differences between Options 1 and 2 in terms of how growth is distributed during the Plan period, but these differences are not significant enough to

warrant one option being ranked higher or lower than the other against the ISA themes referred to earlier in this paragraph.

2.51 Option 3 capitalises upon opportunities associated with the Cardiff Capital Region City Deal, the South East Wales Metro, and the continuing economic growth of the Bristol/ South West region. Whereas Option 4 focuses growth to the most sustainable Settlements to the North of the County capitalising upon opportunities associated with the Cardiff Capital Region City Deal, the A465, and towards Herefordshire via the A449 and A40 along with rail links to Newport, Cardiff and the North via the Welsh Marches line. However, limited growth to the rest of the County under Option 3 and Option 4 would restrict economic growth in the wider County, and would not assist in sustaining Monmouthshire's existing communities, exacerbating existing demographic issues and levels of out-commuting.

2.52 Consideration is also given throughout the appraisal to Future Wales National Plan 2040 (National Development Framework (NDF) 2021) which indicates a desire to designate a Green Belt "around Newport and eastern parts of the region". This is anticipated to include a large part of South Monmouthshire which, although it does not include any of Monmouthshire's main towns, if implemented would significantly constrain future growth in this part of the County. Option 4 would accord with the direction of the Future Wales document, and therefore performs positively in terms of facilitating growth consistent with emerging National policy. PPW notes that longer term needs should be considered when considering the boundaries of a Green Belt. Conversely Option 3 would direct growth to the south where the Green Belt is proposed through the Future Wales document. As all other options seek to disperse growth throughout the County, and a defined location has not yet been established for the Green Belt, it is difficult to make any definitive conclusions on the nature and significance of effects at this stage.

Strategic growth areas

2.53 Strategic growth options have been identified across the four settlement areas of Abergavenny and Llanfoist, Chepstow, Monmouth, and Severnside. A summary of the assessment of these options is provided below.

Abergavenny and Llanfoist

- **Option A**: Land north of Abergavenny.
- **Option B**: Land to the east of the A465; and
- **Option C**: Land between the B4246 and Heads of the Valleys Road.

Figure 2.1: Strategic growth options in Abergavenny and Llanfoist

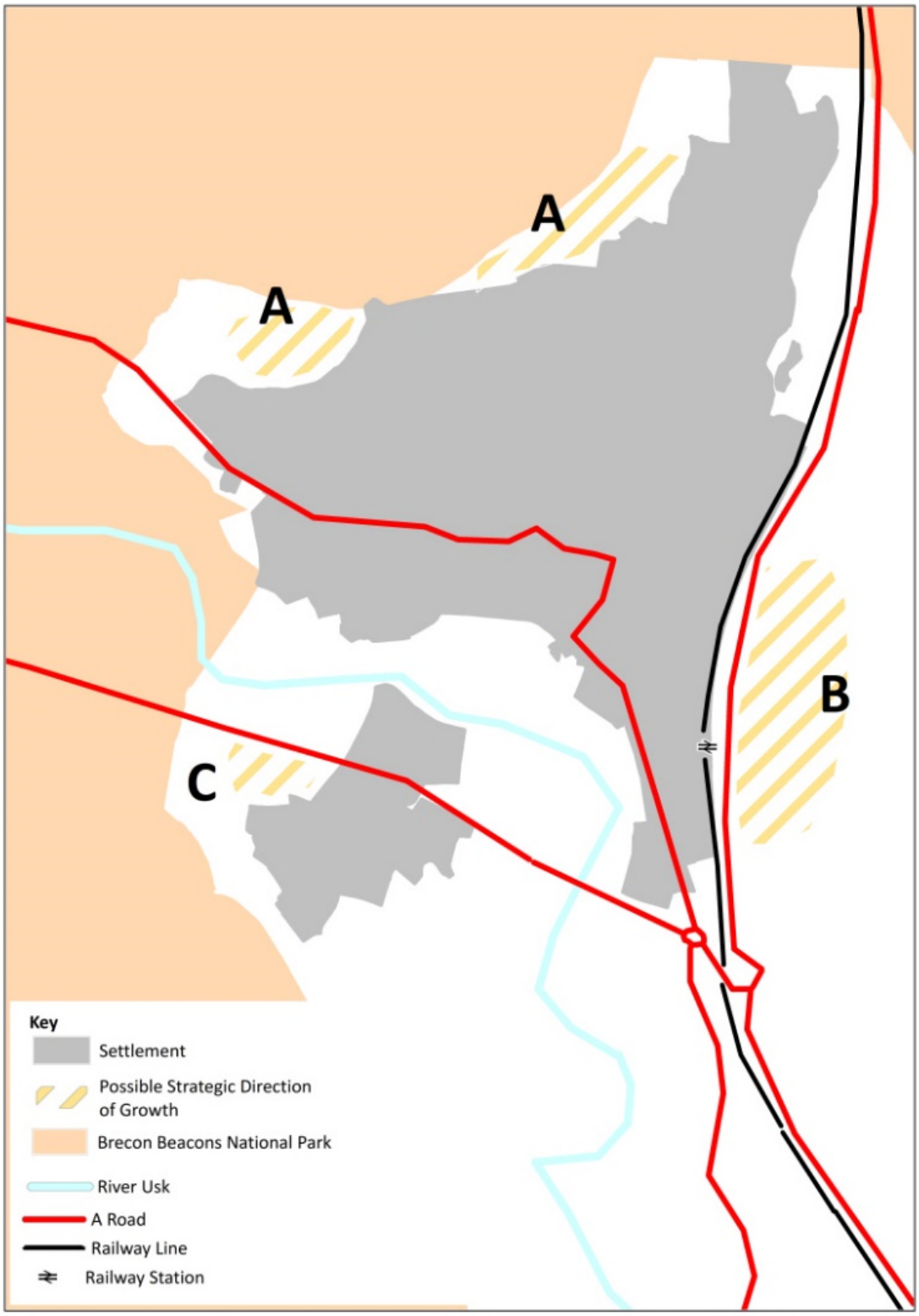

Table 2.4: Summary findings for Abergavenny and Llanfoist strategic growth options

ISA theme	Rank/ Significant effects	Option A	Option B	Option C
Economy and employment	Rank	**1**	**2**	**3**
	Significant effect?	**No**	**No**	**No**
Population and communities	Rank	**1**	**2**	**3**
	Significant effect?	**Yes - Positive**	**Yes - Positive**	**Yes - Positive**
Health and wellbeing	Rank	**1**	**2**	**2**
	Significant effect?	**No**	**No**	**No**
Equalities, diversity, and social inclusion	Rank	**2**	**3**	**1**
	Significant effect?	**No**	**No**	**No**
Transport and movement	Rank	**=**	**=**	**=**
	Significant effect?	**No**	**No**	**No**
Natural resources	Rank	**1**	**2**	**3**
	Significant effect?	**Yes - Negative**	**Yes - Negative**	**Yes - Negative**
Biodiversity and geodiversity	Rank	**1**	**1**	**2**
	Significant effect?	**Yes - Negative**	**Yes - Negative**	**Yes - Negative**
Historic environment	Rank	**2**	**1**	**3**
	Significant effect?	**Uncertain**	**Uncertain**	**Uncertain**
Landscape	Rank	**3**	**1**	**2**
	Significant effect?	**Yes - Negative**	**Yes - Negative**	**Uncertain**

ISA theme	Rank/ Significant effects	Option A	Option B	Option C
Climate change (including flood risk)	Rank	**2**	**1**	**3**
	Significant effect?	**Uncertain**	**Uncertain**	**Uncertain**

2.54 No significant differences have been identified between Options for the Transport and Movement ISA theme.

2.55 All Options perform positively against the Population and Communities, Health and Wellbeing, Equalities, Diversity and Social Inclusion, and Transport and Movement ISA themes, given Options are connected with reasonable distance to Abergavenny town centre, its services and facilities, and sustainable travel. Option A performs most positively of the Options for the majority of ISA Themes discussed above given this Option is most well located in this respect; with Options B and C dissected from the town centre by the A465. However, Option C performs most positively against the Equalities, diversity, and social inclusion ISA theme as this Option best supports deprived communities to the west of the town.

2.56 All Options perform negatively against the Natural Resources ISA theme given all Options would result in the loss of greenfield and BMV agricultural land and would not contribute towards promoting the use of brownfield land. However, it is recognised that there are limited opportunities within the County for brownfield development and development on lower grades of agricultural land. Option A is best performing against this ISA theme as it has the greatest access to the town centre.

2.57 In terms of the Biodiversity ISA theme, Options are constrained in terms of internationally/ nationally/ designated assets/sites, with the potential for significant long term negative effects. Whilst solutions are now available, the mitigation requirements need implementing and the potential for negative effects in their absence are noted at this stage. Supporting policy requirements will reduce the extent of these effects. In terms of ranking the Options, Option C is the worst performing theme as it is within 200m of the River Usk SAC/ SSSI, however given the additional impact pathways identified through the HRA for the SAC (recreation and water quantity, level, and flow), it is considered that Options A and B also have the potential to impact upon this European designated site.

2.58 Options are also constrained in terms of internationally/ nationally/ designated assets/sites under the Landscape and Historic Environment ISA themes. As with biodiversity, Option C is worst performing against the Historic Environment ISA theme given its proximity to the Blaenavon Industrial WHS and potential to affect internationally and nationally designated heritage landscapes. Option A also has the potential to lead to negative effects in this respect. In terms of Landscape, Option A is worst performing due to the potential impact on the Brecon Beacons National Park, its open character and hillside setting. Option A is also worst performing given its 'high/medium' sensitivity to residential development, as set out in the Monmouthshire Landscape Sensitivity Update

Study (2020). Option B is also identified as having 'high/medium' sensitivity to residential development.

2.59 The overall significance of effects against the Biodiversity, Landscape and Historic Environment ISA themes is uncertain at this stage and will be dependent on the design/ layout and implementation of specific mitigation measures. Specifically, in relation to the issue of nutrient neutrality in the River Usk SAC, all residential development coming forward in the hydrological catchment of these riverine SACs will have to be phosphorus neutral and supported by nutrient budgets. It is also noted that there is the potential for positive effects to be delivered, i.e., through improved accessibility to, and enhancement of, designated assets.

2.60 Option C is worst performing of the Options in relation to the Climate Change ISA theme, given that a significant proportion of Option C is located within areas at higher risk of flooding, with the potential for long term negative effects. However as above, for all Options, effects against Climate Change are uncertain at this stage. Uncertainty could be reduced by supporting policy mitigation.

Chepstow

- **Option D**: Land north of the Bayfield Estate.
- **Option E**: Land between the Bayfield Estate and A48; and
- **Option F**: Land between the A48 and M48.

Figure 2.2: Strategic growth options in Chepstow

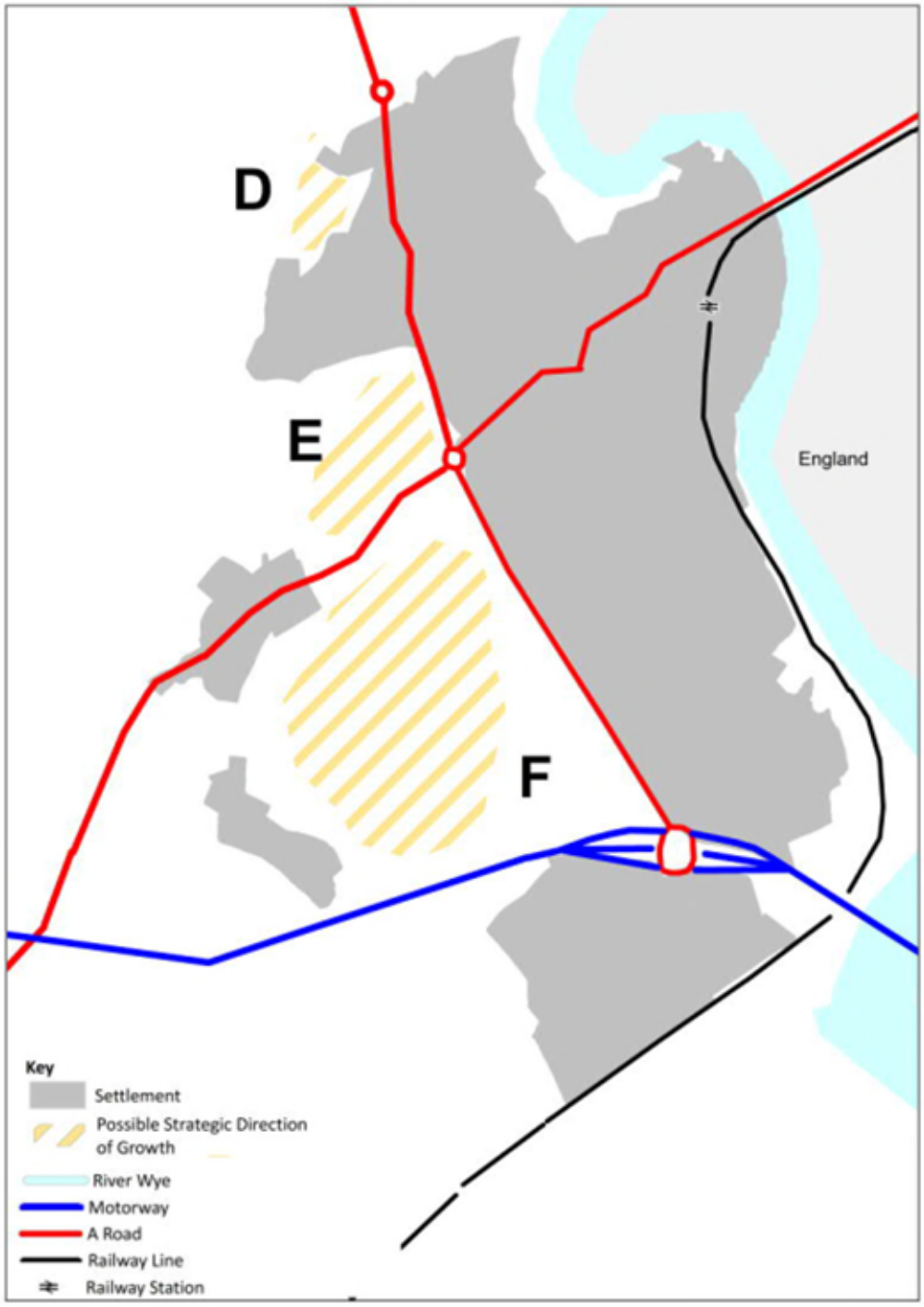

Table 2.5: Summary findings for Chepstow strategic growth options

ISA theme	Rank/ Significant effects	Option D	Option E	Option F
Economy and employment	Rank	**3**	**2**	**1**
	Significant effect?	**No**	**No**	**No**

ISA theme	Rank/ Significant effects	Option D	Option E	Option F
Population and communities	Rank	=	=	=
	Significant effect?	Yes - Positive	Yes - Positive	Yes - Positive
Health and wellbeing	Rank	=	=	=
	Significant effect?	No	No	No
Equalities, diversity, and social inclusion	Rank	2	1	3
	Significant effect?	No	No	No
Transport and movement	Rank	=	=	=
	Significant effect?	No	No	No
Natural resources	Rank	=	=	=
	Significant effect?	Yes - Negative	Yes - Negative	Yes - Negative
Biodiversity and geodiversity	Rank	1	2	3
	Significant effect?	Uncertain	Uncertain	Uncertain
Historic environment	Rank	1	1	2
	Significant effect?	Uncertain	Uncertain	Yes - Negative
Landscape	Rank	2	1	3
	Significant effect?	Uncertain	Yes - Negative	Yes - Negative
Climate change (including flood risk)	Rank	=	=	=
	Significant effect?	Uncertain	Uncertain	Uncertain

2.61 No significant differences have been identified between Options for the Population and Communities, Transport and Movement, Health and Wellbeing, Natural Resources, and Climate Change ISA themes.

2.62 All Options perform positively against the Economy and Employment ISA theme, Population and Communities, Health and Wellbeing, Equalities, Diversity and Social Inclusion and Transport and Movement ISA theme. In terms of Economy and Employment, Option F performs most positively given it is well connected with the M4 corridor, the Severn Bridge, and employment opportunities to the south of the town. In terms of Equalities, Diversity and Social Inclusion, Option E is best performing as it provides improved access for vulnerable groups to the town centre; supporting improved levels of deprivation.

2.63 All Options perform negatively against the Natural Resources ISA theme given all Options would result in increased vehicular use within Chepstow AQMA, and the permeant loss of BMV agricultural land /greenfield land. However, it is recognised that there are limited opportunities within the County for brownfield development and development on lower grades of agricultural land.

2.64 In terms of the Biodiversity, Landscape, and Historic Environment ISA themes; all Options are constrained in terms of internationally/ nationally/ designated assets/ sites, with the potential for significant long term negative effects. In terms of biodiversity, given the impact pathways identified through the HRA (2019), all Options perform equally in terms of impact on the Wye Valley Woodland SAC/ SSSI/ National Nature Reserve and the River Wye SAC/ SSSI. Option F is the worst performing against the Biodiversity ISA theme as there are areas of Ancient Woodland (and other habitats and associated species) present within the Option, impacts upon which have the potential for long term negative effects.

2.65 Option F is the most sensitive in terms of the historic environment as the growth area falls within a conservation area and contains 16 listed buildings. It is not possible to identify any significant differences between Options D and E at this stage in terms of the Historic Environment ISA theme; however, they are considered to be less likely to result in residual significant effects compared to Option F.

2.66 All of the options have the potential for a significant negative effect on the Landscape ISA them. Assuming that the same scale/ type of development would be delivered within the strategic growth areas, the differences identified between them at this stage mainly reflect the Landscape Sensitivity Update Study (2020) and findings. Option F is worst performing, given its ‘high’ sensitivity to residential development; followed by Option D given it is identified as having medium landscape sensitivity and located adjacent to the AONB.

2.67 For all Options, effects against Climate Change are uncertain at this stage. Uncertainty could be reduced by supporting policy mitigation.

Monmouth

- **Option G**: Land west of Monmouth.
- **Option H**: Land in central Monmouth; and
- **Option I**: Land north-east of Monmouth.

Figure 2.3: Strategic growth options in Monmouth

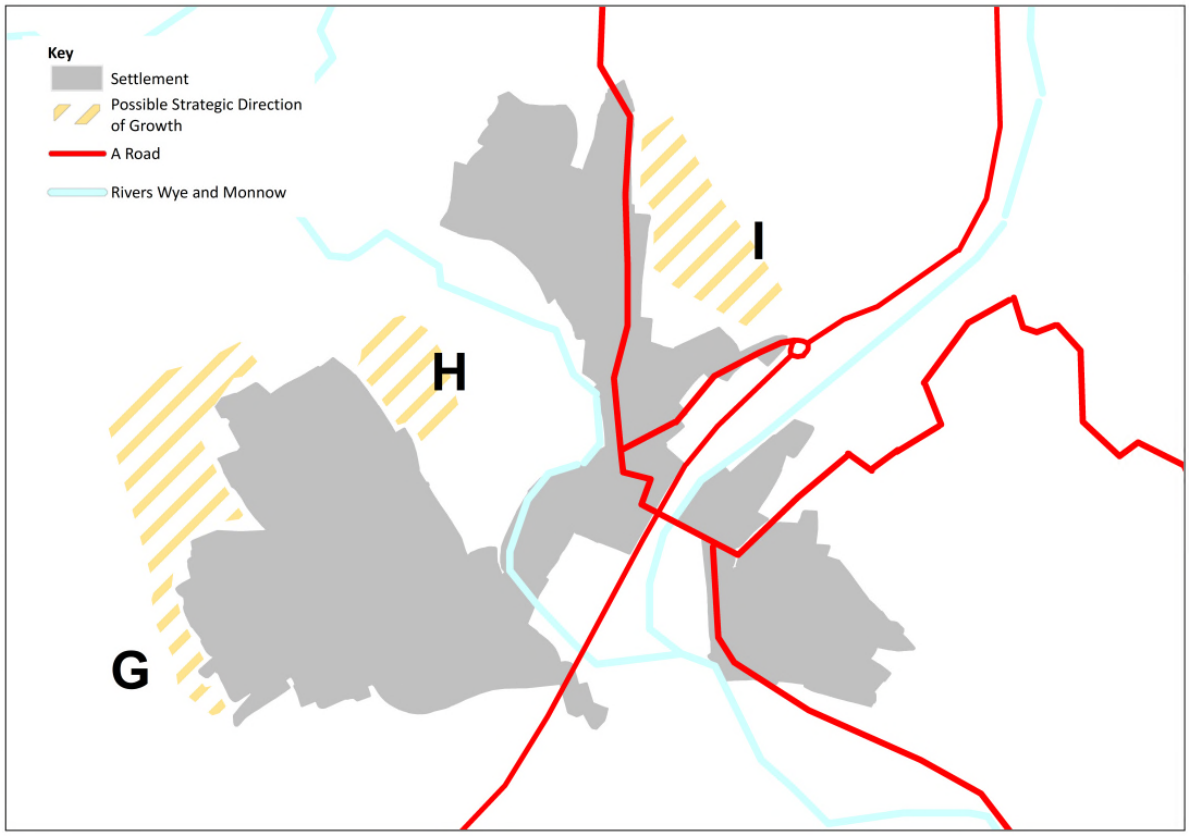

Table 2.6: Summary findings for Monmouth strategic growth options

ISA theme	Rank/ Significant effects	Option G	Option H	Option I
Economy and employment	Rank	**2**	**1**	**3**
	Significant effect?	**No**	**No**	**No**
Population and communities	Rank	**2**	**1**	**1**
	Significant effect?	**Yes - Positive**	**Yes - Positive**	**Yes - Positive**
Health and wellbeing	Rank	**1**	**1**	**1**
	Significant effect?	**No**	**No**	**No**
Equalities, diversity, and social inclusion	Rank	**=**	**=**	**=**
	Significant effect?	**No**	**No**	**No**

ISA theme	Rank/ Significant effects	Option G	Option H	Option I
Transport and movement	Rank	=	=	=
	Significant effect?	No	No	No
Natural resources	Rank	1	2	3
	Significant effect?	Yes - Negative	Yes - Negative	Yes - Negative
Biodiversity and geodiversity	Rank	1	1	2
	Significant effect?	Yes - Negative	Yes - Negative	Yes - Negative
Historic environment	Rank	1	2	3
	Significant effect?	Uncertain	Uncertain	Uncertain
Landscape	Rank	1	2	2
	Significant effect?	Uncertain	Yes - Negative	Yes - Negative
Climate change (including flood risk)	Rank	=	=	=
	Significant effect?	Uncertain	Uncertain	Uncertain

2.68 No significant differences have been identified between Options for the Equalities, Diversity and Social Inclusion, Transport and Movement, and Climate Change ISA themes.

2.69 All Options perform positively against the Economy and Employment ISA theme, Population and Communities, Health and Wellbeing, Equalities, Diversity and Social Inclusion, and Transport and Movement ISA themes, given Options are connected with reasonable distance to Monmouth town centre, its services and facilities, and sustainable travel. Option H performs most positively of the Options for Economy and Employment, Population and Communities, and Health and Wellbeing ISA Themes given this Option is most well located in this respect. Option G also performs well due to its location adjacent to the Wonastow Estate employment site.

2.70 All Options perform negatively against the Natural Resources ISA theme given all Options would result in the loss of greenfield and BMV agricultural land and would not contribute towards promoting the use of brownfield land. However, it is recognised that there are limited opportunities within the County for brownfield development and development on lower grades of agricultural land. Option G is best performing in this respect as it is the least constrained Option

in terms of BMV agricultural land coverage. Option I is worst performing given it would result in the loss of higher quality agricultural land in comparison with Option H.

2.71 In terms of the Biodiversity ISA themes; all Options are constrained in terms of internationally/ nationally/ designated assets/ sites, with the potential for significant long term negative effects. Whilst solutions are now available to address nutrient neutrality issues, the mitigation requirements need implementing and the potential for negative effects in their absence are noted at this stage. Supporting policy requirements will reduce the extent of these effects. In terms of ranking the Options, given the proximity of Option I to the River Wye SAC/ SSSI and the Wye Valley Woodland SAC/ SSSI/ National Nature Reserve, and the biodiversity present at the Option itself, Option I is worst performing overall.

2.72 All Options are also constrained in terms of internationally/ nationally/ designated assets/ sites under the Landscape and Historic Environment ISA themes. As above in relation to biodiversity, Option I is worst performing against the Historic Environment ISA theme as there are numerous heritage assets present in close proximity to the Option (Monmouth (Dixton) Conservation Area to the south east of the Option (which contains two scheduled monuments and five listed buildings), and the listed buildings to the north west of the Option on the other side of the A466).

2.73 Options I and J perform equally against the Landscape ISA theme given both are identified as having high/medium sensitivity to residential development, and both are constrained by landscape designations (Option I is located adjacent to a Landscape of Outstanding or Special Historic Interest, while Option H is designated in the current adopted LDP as an 'Area of amenity importance).

2.74 The overall significance of effects against the Biodiversity, Landscape and Historic Environment ISA themes is uncertain at this stage and will be dependent on the design/ layout and implementation of specific mitigation measures. Specifically, in relation to the emerging issue of nutrient neutrality in the River Wye SAC, Natural Resources Wales and Natural England advise that all residential development coming forward in the hydrological catchment of these riverine SACs will have to be phosphorus neutral and supported by nutrient budgets. It is also noted that there is the potential for positive effects to be delivered, i.e., through improved accessibility to, and enhancement of, designated assets.

2.75 For all Options, effects against Climate Change are uncertain at this stage. Uncertainty could be reduced by supporting policy mitigation.

Severnside

- **Option J**: Land north-east of Caldicot.
- **Option K**: Land north-west of Caldicot.
- **Option L**: Land west of Caldicot/ east of Rogiet; and
- **Option** M: Land east of Caerwent.

Figure 2.4: Strategic growth options in Severnside

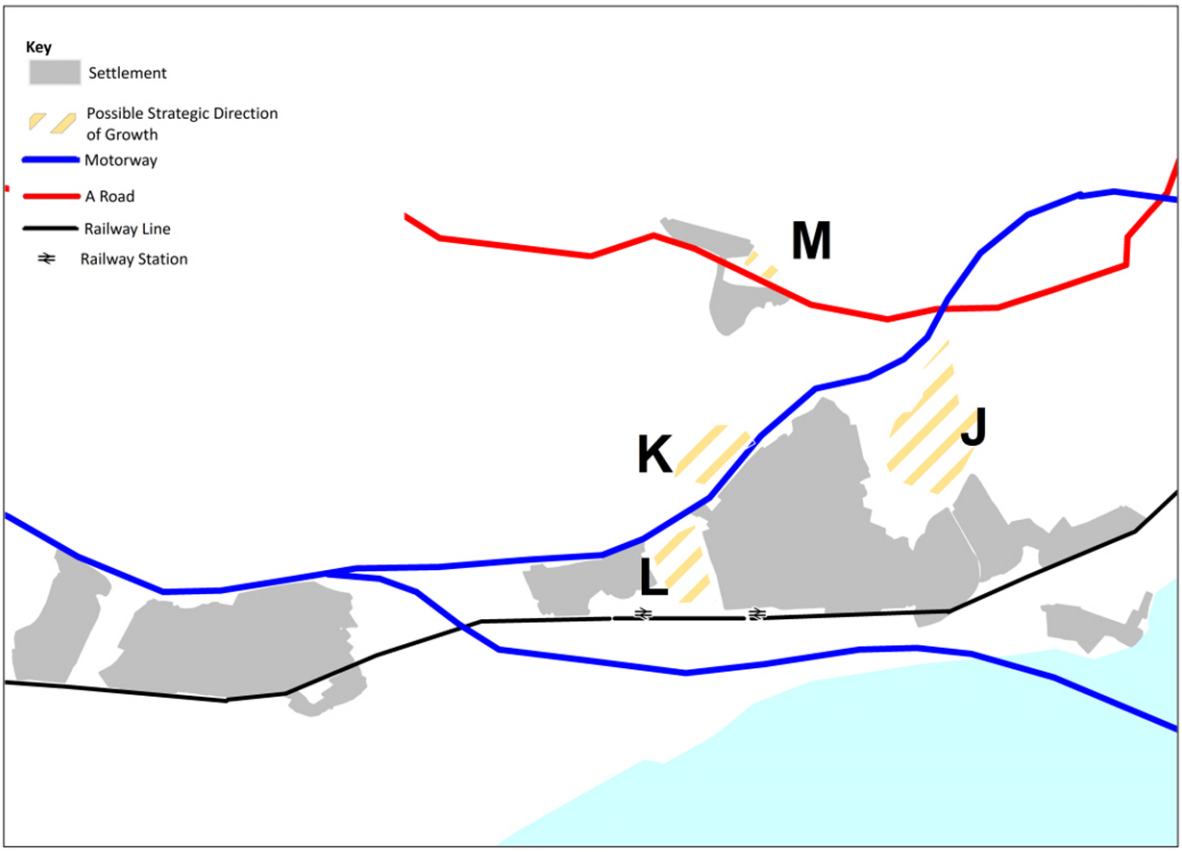

Table 2.7: Summary findings for Severnside strategic growth options

ISA theme	Rank/ Significant effects	Option J	Option K	Option L	Option M
Economy and employment	Rank	**2**	**2**	**1**	**3**
	Significant effect?	**No**	**No**	**No**	**No**
Population and communities	Rank	**1**	**2**	**1**	**3**
	Significant effect?	**Yes - Positive**	**Yes - Positive**	**Yes - Positive**	**Yes - Positive**
Health and wellbeing	Rank	**2**	**2**	**1**	**3**
	Significant effect?	**No**	**No**	**No**	**No**
Equalities, diversity, and social inclusion	Rank	**2**	**3**	**1**	**4**

ISA theme	Rank/ Significant effects	Option J	Option K	Option L	Option M
	Significant effect?	**No**	**No**	**No**	**No**
Transport and movement	Rank	**2**	**2**	**1**	**3**
	Significant effect?	**No**	**No**	**No**	**No**
Natural resources	Rank	**2**	**2**	**1**	**2**
	Significant effect?	**Yes - Negative**	**Yes - Negative**	**Yes - Negative**	**Yes - Negative**
Biodiversity and geodiversity	Rank	**3**	**2**	**3**	**1**
	Significant effect?	**Uncertain**	**Uncertain**	**Uncertain**	**Uncertain**
Historic environment	Rank	**3**	**2**	**1**	**2**
	Significant effect?	**Uncertain**	**Uncertain**	**No**	**Uncertain**
Landscape	Rank	**3**	**3**	**2**	**1**
	Significant effect?	**Yes - Negative**	**Yes - Negative**	**Uncertain**	**Uncertain**
Climate change (including flood risk)	Rank	**1**	**1**	**3**	**2**
	Significant effect?	**Uncertain**	**Uncertain**	**Uncertain**	**Uncertain**

2.76 All Options perform positively against the Population and Communities, Health and Wellbeing, Equalities, Diversity and Social Inclusion, and Transport and Movement ISA themes, given Options have good to reasonable access to services and facilities throughout the Severnside area (notably Caldicot town centre), and access to the strategic transport network. Options have the potential to capitalise upon sustainable travel opportunities in the key Severnside settlements (namely Caldicot and the Severn Tunnel Junction rail station in Rogiet), in addition to utilising the M4 corridor. This will provide access to wider employment markets, including opportunities associated with the Cardiff Capital Region City Deal and the South East Wales Metro. While positive effects are anticipated through all Options, Option M performs least well of the Options given its comparatively poor access to Severnside centres,

services and facilities, and relatively limited potential to capitalise upon the strategic road network.

2.77 In terms of differentiating between Options J-L for the above ISA themes, Option L is best performing given its location along the M4 corridor, nestled between Caldicot and Rogiet, and its ability to capitalise upon sustainable transport infrastructure and encourage modal shift. Option J and K perform relatively on a par, given reasonable access to services, facilities, and the strategic road network/ sustainable transport opportunities.

2.78 All Options perform negatively against the Natural Resources ISA theme given all Options would result in the loss of greenfield and BMV agricultural land and would not contribute towards promoting the use of brownfield land. However, it is recognised that there are limited opportunities within the County for brownfield development and development on lower grades of agricultural land. Option L is best performing against this ISA theme as it is well located in terms of potential to utilise sustainable travel and improve air quality; is the least constrained in terms of Grade 1 agricultural land coverage.

2.79 In terms of the Biodiversity, Landscape, and Historic Environment ISA themes; Options are constrained in terms of internationally/ nationally/ designated assets/ sites, with the potential for significant long term negative effects. Options J and L are worst performing against the Biodiversity ISA theme given the presence of the Severn Estuary SPA/ SAC/ Ramsar site/ SSSI within 900m and 1.2km of the Options, respectively. Option M is identified as best performing, given it is the least constrained of the Options in terms of potential impact on biodiversity designated sites, and overall biodiversity value.

2.80 Option J is also worst performing against the Historic Environment ISA theme given it may lead to some development within the Caldicot Conservation Area, which also contains Caldicot Castle Grade I listed building and Scheduled Monument; and would result in the loss of large areas of greenfield/ open space in the setting of the castle which is also a Country Park. Option L is the least sensitive in terms of the historic environment. Options J and K are worst performing in terms of landscape, given both have been identified through the Landscape Sensitivity Update Study (2020) as having ‘medium-high sensitivity for housing development. Option K would extend development northwest of the M48 into the open landscape; while Option J would extend the settlement of Caldicot to the northeast, towards the settlement of Crick and extend development north of the Caldicot Castle Country Park (which is also a conservation area). Option L has medium sensitivity to residential development, and may lead to coalescence between Caldicot and Rogiet, resulting in the loss of a multi-functional open space and designated ‘Green Wedge’. Option M is best performing in this respect, although there remains the potential for residual minor negative effects.

2.81 The potential for Options to lead to significant effects against the Biodiversity, Landscape, and Historic Environment ISA themes is uncertain at this stage and will be dependent on the design/ layout and implementation of specific mitigation measures. It is also noted that there is the potential for positive effects to be delivered, i.e., through biodiversity net-gain, and the enhancement of designated assets.

2.82 Option L is worst performing of the Options in relation to the Climate Change ISA theme, given that a significant proportion of Option L is located within Flood Zones B/C, with the potential for long term negative effects. However as above, for all Options, effects against Climate Change are uncertain at this stage. Uncertainty could be reduced by supporting policy mitigation.

3. Developing the preferred strategy

3.1 This Chapter presents the Council's response to the alternatives appraisal and the Council's reasons for selecting its preferred approach in light of alternatives appraisal and other factors.

The Council's outline reasons for choosing the preferred strategy

Preferred growth and spatial option

3.2 The options appraisal concluded that Growth Option 2 and Spatial Option 2 combined were the most appropriate options for the 2022 Preferred Strategy and Deposit Plan.

3.3 While Growth Option 2 reduces the level of growth proposed compared to the 2021 Preferred Strategy it is considered the best option to respond to challenges, namely the Welsh Government objection to the level of growth set out in the 2021 Preferred Strategy, whilst also ensuring that the RLDP delivers on the Council's objectives and addresses the core issues of delivering much needed affordable housing at pace and scale, responding to the climate and nature emergency by delivering zero carbon ready new homes for our communities, and ensuring our communities are socially and economically sustainable. Similarly, Spatial Option 2 would address our locally evidence-based issues and objectives including in relation to the delivery of affordable homes, rebalancing our demography and responding to the climate and nature emergency, and as such is considered the most appropriate spatial strategy option.

3.4 The Preferred Growth Strategy is based on a demographic-led scenario with added policy assumptions[7]. It provides a level of growth (homes and jobs) that maximises the extent to which we address our local evidence-based issues, including in relation to the delivery of affordable homes, sustainable economic growth, rebalancing our demography by ensuring that young people can choose to live in the County while responding to the climate and nature emergency. The ISA analysis identifies that Growth Option 2 performs slightly less positively than Growth Option 1 given the level of growth proposed is less, however similar positive effects are predicted under this option. This growth option performs well against ISA themes relating to the economy and employment, population and communities, health/wellbeing and equalities as the additional growth provides an opportunity to deliver a range of new housing, employment opportunities and community infrastructure to meet the needs of the County providing a more balanced demographic and sustainable communities. While Growth Option 1 is identified as best performing against ISA themes relating to the economy and employment, population and communities, health/wellbeing and equalities it performs least favourably against ISA themes relating to Natural Resources, Biodiversity and Geodiversity, Historic Environment and Landscape. In addition, Welsh Government raised significant concerns in relation to this Growth Option

[7] Demographic-led option for the LPA area (i.e. excludes the BBNP area within Monmouthshire) using ONS 2020 MYE base and applying assumptions in relation to migration, household membership rates and commuting ratio, as set out in the Housing Background Paper.

suggesting the level of growth in Monmouthshire would undermine growth in the national growth area of Cardiff, Newport and the Valleys and as a result would not be in general conformity with policies 1 and 33 of Future Wales: the National Plan 2040. Growth Option 1 has therefore been discounted. Further to this, Growth Option 3 performs negatively to RLDP objectives relating to Economic Growth/Employment, Demography, Housing, Place-making, Communities, Rural Communities, Infrastructure and Accessibility. It is also noted for potential negative effects in relation to the ISA themes of economy and employment, population and communities, health and wellbeing, and equalities, diversity, and social inclusion. Option 3 would not deliver on the Council's core objectives of delivery of affordable housing and rebalancing our demography and has subsequently been rejected. For further details on Growth Options 1 and 3 refer to the Growth and Spatial Strategy Options Appraisal as set out in Appendix 1.

3.5 Spatial Option 2 and Spatial Option 1 perform positively against ISA themes, in relation to population/ communities, health/ wellbeing, economy/ employment, and equalities. The Preferred Growth and Spatial Option would best achieve sustainable balanced deliverable outcomes by:

- Delivering a level of growth (homes and jobs) that addresses our locally evidence-based issues and objectives, including in relation to the delivery of affordable homes, rebalancing our demography and responding to the climate and nature emergencies, whilst having regard to WG officer concerns regarding alignment with Future Wales: The National Plan 2040.
- Maximising affordable housing delivery on new housing allocations, reflecting the Council's commitment to deliver 50% affordable homes on new housing sites which would help to tackle Monmouthshire's housing need, homelessness, and social inequality. This approach would also enable the Council to consider alternative mechanisms for delivering affordable homes.
- Providing a wider choice of smaller homes to enable younger people to live and work in Monmouthshire which would make our ageing communities more socially and economically sustainable.
- Requiring new homes to be net zero carbon, reflecting our commitment to responding to and tackling climate change.
- Delivering growth in our most sustainable settlements. This would limit the impacts of climate change and ensure good placemaking principles of attractive, accessible places to live and work that have access to sustainable transport links and reduce the need for journeys by the car.
- Promoting sustainable economic growth by providing policy support to enable and facilitate home/remote working, enabling economic growth through supporting the delivery of the priorities and aims identified in the Council's Economy, Employment and Skills Strategy and climate emergency declaration, maximising opportunities from Cardiff Capital Region City Deal, targeting growth in key economic sectors and providing appropriate employment land in the right locations.

3.6 Overall, it is considered that the Deposit Plan, based on the above preferred growth and spatial options, strikes a compromise between achieving our local evidence-based objectives that underpinned the Preferred Strategy consulted

upon in July 2021 and the Welsh Government's response which objected to the level of growth proposed. In response, the Deposit Plan proposes a lower level of growth that responds to these challenges.

Preferred Strategic Site Allocations

3.7 The Preferred Strategic Site Allocations have been selected from a total of 13 Strategic Growth Options located across Abergavenny, Chepstow, Monmouth and Severnside that were previously consulted on in the 2021 and 2022 Preferred Strategy. Site selection has been informed by the assessment of candidate sites and the consultation responses received.

3.8 As part of the consultation in July 2021, preferences were cast by members of the public using 'Placecheck'. Although it was made clear at that time that this was not part of the formal consultation, the results provide a helpful indication of public opinion. A total of 3,179 preferences were cast in the process. Table 7.1 below provides further detail. The four Preferred Strategic Site Allocations identified in the Deposit Plan are highlighted.

Table 3.1: Strategic site options

SEA option	Strategic growth area	Up votes	Down votes
Abergavenny A	Land north of Abergavenny	54	184
Abergavenny B	Land to the east of the A465	191	23
Abergavenny C	Land between the B4246	107	47
Chepstow D	Land north of the Bayfield Estate	51	132
Chepstow E	Land between the Bayfield Estate and A48	43	143
Chepstow F*	Land between the A48 and M48	60	143
Monmouth G	Land west of Monmouth	270	175
Monmouth H	Land central Monmouth	255	189
Monmouth I	Land north east Monmouth	318	248
Severnside J	Land north east of Caldicot	74	72
Severnside K	Land north west of Caldicot	48	85
Severnside L	Land west of Caldicot/ east of Rogiet	57	100
Severnside M	Land east of Caerwent	59	51

*Site/ Option F is no longer being put forward for development by the site promoter

3.9 The reasons for selection of sites are set out below:

Land to the East of Abergavenny (Option B)

3.10 The preferred strategic site allocation is a sustainably located edge of settlement site. Development here would expand the built-up area of the town beyond the A465 which currently forms a hard development boundary to the town. The site has the potential to form a well-connected urban extension to Abergavenny and provides the opportunity to provide a mixed-use

development, containing a mix of residential uses alongside employment/commercial uses, facilities and services.

3.11 The proximity of the area to Abergavenny Railway Station (currently an approximately 10-minute walk, 0.5 miles) offers significant benefits to maximise opportunities for a modal shift to more sustainable forms of transport and offers an opportunity for transit-oriented development. The site is just an approximate 16-minute walking distance from the town centre (0.7 miles). Vehicular access would be required from the A465 trunk road. The site has potential to offer park and ride facilities for Abergavenny train station, helping address an existing problem and supporting future modal shift alongside the increased train service frequency proposed as part of the South Wales Metro proposals.

3.12 The land is categorised as having high/medium landscape sensitivity to residential development in the Landscape Sensitivity Update. The site is mostly located on an area of predictive grade 2/3a BMV agricultural land. However, when considering the search sequence recommended in PPW12 it is noted that most of the land surrounding Abergavenny is either of BMV status or within floodplain. Moreover, the County's primary settlements are surrounded by either BMV land or flood plain meaning an alternative spatial strategy would not avoid allocating BMV land for development. Development will need demonstrate phosphate neutrality or betterment in its design and/or its contribution to the water body of the River Usk SAC catchment area.

3.13 This allocation could helpfully identify the long-term direction of growth for the town. This longer-term potential is advantageous.

Land at Mounton Road, Chepstow (Option E)

3.14 The Bayfield Site has not progressed to the Deposit Plan. In October 2023 a report of post consultation Preferred Strategy changes was agreed by Council. This included swopping the strategic site in Chepstow from Bayfield to Land at Mounton Road on the basis that a mixed-use development that includes a care home and proposed hotel had associated job creation and tourism benefits.

3.15 The preferred strategic site allocation is a sustainably located edge of settlement site. Development here would expand the existing built-up area west of the A466 (St Lawrence Road), north of the A48 and south of Mounton Road. The site is near the Wye Valley National Landscape (AONB) and on the opposite side of the road to the Mathern Conservation Area. PPW gives National Parks and AONBs equal status in terms of landscape and scenic beauty and requires that both be afforded the highest status of protection from inappropriate developments. Development in this location would need to be carefully designed to ensure that any effects on the setting of the National Landscape are acceptable. The land is categorised as being of high/medium landscape sensitivity to residential development.

3.16 The site is approximately 0.9 miles or an approximate 15-minute walking distance from the town centre and Bulwark neighbourhood centre, 0.9 miles (approximately 17-minute walk) from Chepstow Comprehensive School and Leisure Centre, and 1.1 miles (approximately 9-minute walk) from Chepstow railway station. As outlined above, careful consideration will be required regarding the cumulative impact of development on the A466, A48 and Highbeech roundabout.

3.17 Circa 72% of the land is predictive grade 2 and 3a BMV agricultural land. However, when considering the search sequence recommended in PPW it is noted that most of the land surrounding Chepstow is either of BMV status or affected by other constraints. Moreover, the County's primary settlements are surrounded by either BMV land or flood plain meaning an alternative spatial strategy would not avoid allocating BMV land for development. Another consideration will include its location in the limestone minerals safeguarding area.

Leasbrook, Monmouth (Option I)

3.18 The preferred strategic site allocation in Monmouth relates to a greenfield site to the north-east of Monmouth. The site is a sustainably located edge of settlement site north of Dixton Road. The site is located adjacent to existing development at Dixton Close and Hereford Road, including Haberdashers' Monmouth School's playing pitches to the west, along with agricultural land to the east and north.

3.19 Monmouth sits within the River Wye Special Area of Conservation (SAC) catchment area. The strategic site will therefore need to demonstrate phosphate neutrality or betterment in its design and/or its contribution to the water body. A strategic solution to phosphates at the Monmouth Wastewater Treatment Works has been identified by Dŵr Cymru Welsh Water which should be implemented by 31st March 2025.

3.20 The site is near the Dixton Roundabout offering good links to locations further afield when public transport and use of the private car is necessary. There is no rail network to encourage sustainable travel by rail, the need to reduce travel/carbon and support active travel options is of importance.

3.21 Regarding agricultural land, the site contains a small amount of Grade 2 land with most of the site Grade 3a with Grade 3b. However, when considering the search sequence recommended in PPW it is noted that most of the land surrounding Monmouth is of BMV status. Moreover, the County's primary settlements are surrounded by either BMV land or flood plain meaning an alternative spatial strategy would not avoid allocating BMV land for development.

3.22 As a small part of the main access point of the site is located in floodplain, an emergency access will be included to ensure an alternative route in any extreme flooding events on Dixton Road. The site is located within proximity to two Special Areas of Conservation and adjoins the Dixton Conservation Area with a very small portion of the site being located in the Lower Wye Valley Landscape of Historic Interest.

3.23 In terms of distance to Monmouth Town Centre the site is located approximately 0.6 miles/13-minutes from the Town Centre with the whole Town Centre being located within 0.9 miles and an 18-minute walk. The site is in very close proximity to Monmouth Comprehensive School 0.4miles/ 7-minutes and the Leisure Centre 0.6miles/ 12-minutes (using the public entrance/route).

Land to the East of Caldicot (Option J)

3.24 The preferred strategic site allocation is a sustainably located edge of settlement site. Development here would extend the settlement of Caldicot to the northeast, towards the settlement of Crick and adjacent to the adopted LDP

Crick Road, Portskewett site. The site is north of the Caldicot Castle Country Park, a Conservation Area and an area currently designated as an Area of Amenity Importance under the Adopted LDP.

3.25 A small part of the candidate site adjacent to the former railway line is in the floodplain: built development would not be permitted within this part of the site. Part of the site includes previously developed land comprising a commercial equestrian centre, with much of the remainder being on Council-owned land. The inclusion of such suitable land is supported by Future Wales Policy 3 which supports public leadership and the use of public land to deliver on ambitious affordable housing targets.

3.26 In terms of agricultural land, the site contains a small area of grade 1 agricultural land, most of which is within a floodplain so would not be built on. The remaining area is classified predominantly as grade 2 agricultural land. However, when considering the search sequence recommended in PPW it is noted that most of the land surrounding Caldicot is either of BMV status or floodplain. Moreover, the County's primary settlements are surrounded by either BMV land or flood plain meaning an alternative spatial strategy would not avoid allocating BMV land for development.

3.27 In terms of distance from Caldicot town centre, it is approximately 1.2 miles (from a central point of the growth area) and approximately 22-minutes walking distance. It is approximately a 33-minute walk from Caldicot railway station. The former railway line has recently been purchased by MCC and is being turned into an active travel route, offering a significant benefit in terms of modal shift and leisure provision. Landscape sensitivity to residential development is high/ medium. Part of this site is within the limestone minerals safeguarding area.

3.28 This allocation could helpfully identify the long-term direction of growth for the town. This longer-term potential is advantageous.

Part 2: What are the ISA findings at this stage?

4. Appraisal findings at this stage

4.1 Part 2 of the ISA Report and this NTS answers the question - what are appraisal findings at this stage? - by presenting an appraisal of the Preferred Strategy Document. Summary findings of the appraisal are presented below.

4.2 **Table 4.1** overleaf sets out a summary of the appraisal findings against each ISA theme. At this later stage of plan-making no recommendations are identified, recognising that earlier iterations of the ISA have informed plan development.

Table 4.1: Summary of the appraisal findings

ISA theme	Conclusion
Economy and employment	Overall, the employment land protections and provisions, alongside well-connected housing and town / local centre development are considered likely to lead to **significant positive effects** for this ISA theme. Additional provisions that seek to improve the local environment and sustainable and active travel connections will also bolster positive effects and support the rural economy and tourism growth.
Population and communities	Considering the above, it is anticipated that implementation of the RLDP will likely lead to **significant positive effects**. This is due to its support of building sustainable and resilient communities across Monmouthshire and tackling the affordable housing challenge. This also reflects the focus of the RLDP on bringing forward different housing development (various types and tenures) in well-connected areas to meet the varying needs of the population.
Health and wellbeing	Overall, it is considered that the RLDP will have **significant positive effects** on the health and wellbeing of Monmouthshire's population. This is through supporting development within proximity to key services and facilities in the higher tier settlements of Monmouth, Abergavenny, Chepstow and Caldicot. It also reflects the focus of the wider policies on bringing forward new infrastructure to support physical and mental health, for example green and blue infrastructure. This will ensure a continued high-quality service of resources in Monmouthshire.
Equalities, diversity, and social inclusion	Considering the above, it is anticipated that **significant positive effects** will come forward as a result of the RLDP for this ISA theme. This is due to the focus on protecting existing and supporting new infrastructure in the neighbourhood area, thereby safeguarding, and improving access to important services and facilities. It also reflects policy requirements for development that promotes accessible and inclusive places. The strategic allocations for housing development also contribute to equalities, diversity, and social inclusion – linked to their ability to provide a significant number of affordable houses that are supported by existing infrastructure within the primary settlements.

ISA theme	Conclusion
Transport and movement	Considering the above, **significant positive effects** are concluded likely for the transportation and movement ISA theme under the RLDP. This reflects the focus on bringing forward strategic allocations in settlements with a good distribution of services and facilities and transportation infrastructure. Furthermore, there is a focus on prioritising existing public rights of way and active transportation infrastructure and enhancing the network where appropriate. This will likely contribute to reducing the reliance on private vehicles to move around the area and will help support the transportation network in Monmouthshire.
Natural resources (air, land, minerals and water)	In summary, the plan includes a good level of provision for mineral safeguarding and water quality and works well to reduce impacts on air quality. However, it is noted there is a need to conserve greenfield sites. It is recognised there are limited brownfield opportunities within Monmouthshire, and the plan works well to allocate strategic sites within settlement boundaries and adjacent to built up areas. However, at this time, **significant negative effects** are concluded likely for the impact on natural resources, due to the substantial (and unavoidable) loss of greenfield and agricultural land.
Biodiversity and geodiversity	Considering the above and with nutrient neutrality solutions now in place, **minor positive effects** are considered most likely for the biodiversity and geodiversity ISA theme under the RLDP. This is due to the policy framework avoiding adverse impacts on important sites for biodiversity, and the focus of the plan on bringing forward net gains and improving ecological connectivity.
Historic environment	At this time, **minor negative effects** are concluded most likely under the RLDP for this ISA theme. This reflects the proximity of site allocations to heritage features, and their potential to impact upon the historic environment where the design and layout of development will be crucial to minimise negative effects, as guided by the Deposit Plan policies. There are also notable policy provisions included under the RLDP, which will directly and indirectly benefit the historic environment by protecting specific features and enhancing the wider setting they are located within.
Landscape	At this time, **minor negative effects** are considered most likely in relation to the landscape ISA theme. Whilst development will impact upon landscape character and quality in Monmouthshire, the RLDP works well to reduce this impact by allocating sites within settlement boundaries and outside of landscape designations. Furthermore, the development policies and wider policy provisions under the RLDP work to maintain and enhance landscape character and quality – for example, through green infrastructure provision and resisting development in the open countryside. Despite this, considerable greenfield loss will impact the landscape cumulatively.

ISA theme	Conclusion
Climate change (including flood risk)	At this time, **neutral effects** are considered most likely in relation to climate change adaptation. This reflects the allocation of strategic sites at little to no risk of flooding. This conclusion is also based on the policy provisions of the RLDP, including those under Strategic Policy S4 (Climate Change), which seek to reduce flood risk across Monmouthshire. In terms of climate change mitigation, **minor negative effects** are concluded most likely at this time. Though the RLDP includes policy stipulations to help reduce emissions (including active and public transportation, green infrastructure provision, and encouraging containment within settlements), the level of growth proposed through the housing policies is significant and will increase emissions across Monmouthshire.

Part 3: What happens next?

5. Next steps and monitoring

5.1 Part 3 of the SA Report and this NTS explains the next steps in the plan-making/ SA process.

Next steps

5.2 This ISA Report will accompany the Deposit Plan for public consultation. Any comments received will be reviewed and considered as part of the iterative plan-making and ISA process and inform the submission RLDP.

Monitoring

5.3 **Table 5.1** below outlines the proposed monitoring for the RLDP. This will be refined in the ISA Adoption Statement.

Table 5.1 Proposed ISA monitoring programme for the RLDP

ISA theme	Proposed monitoring measure
Economy and employment	• Overall employment and unemployment rate. • Net additional employment floorspace. • Net additional floorspace of commercial development by location. • Net improved quality employment floorspace. • Annual tourism income. • Net additional tourism development by location and type.
Population and communities	• Five-year housing land supply. • Number of pitches for travellers and travelling showpeople provided. • Regular updates to the Gypsy, Traveller and Travelling Showpeople Accommodation Assessment. • Number of affordable homes completed in the reporting year. • Number of homes completed by type and bedroom size in the reporting year. • Number of homes completed providing specialist accommodation in the reporting year. • Number of self-build/ custom build homes completed in the reporting year.
Health and wellbeing	• Area of new accessible natural spaces provided through development proposals. • Areas of improved access to natural green spaces provided through development proposals. • New active travel connections by location. • Loss/ gain of public open space by type. For example, park, children's playground, allotments.
Equalities, diversity, and social inclusion	• Indices of multiple deprivation scorings.

ISA theme	Proposed monitoring measure
Transport and movement	• Road junction improvements. • Improvements in accessibility scoring by location for walking and cycling. • Improvement in public transport networks. • Transport Plans agreed by location and land use type. • Additional kilometres of Public Rights of Way.
Natural resources (air, land, minerals, and water)	• Continued air quality monitoring data at air quality monitoring locations. • AQMA revocations. • Area of contaminated land remediated in reporting year. • Number and location of schemes implemented with sustainable drainage serving existing as well as new development. • Number and location of development including watercourse re-naturalisation or flood storage areas. • Number and location of development schemes affecting mineral safeguarding areas. • Area and location of brownfield redevelopment in the reporting year. • Loss of agricultural land by grade. • Area of greenfield development in the reporting year. • Number and location of developments contributing to maintenance of water infrastructure. • Number and location of non-domestic schemes achieving a reduction in water usage over the baseline.
Biodiversity and geodiversity	• Action Plan targets that monitor and manage the impacts of growth on internationally designated sites (SACs/ SPAs/ Ramsar) • Net gains/ losses of buffer land and alternative green space by function that reduce pressures of growth designated sites. • Net gain/ loss of habitat arising from development proposals. • New linkages between habitats by location.
Historic environment	• Number, type, and location of approved development impacting on a heritage asset. • Number of heritage assets improved and raised out of the ‘at risk’ category.
Landscape	• Positive landscape impact assessments on proposals approved. • Negative landscape impact assessments on proposals refused.
Climate change (including flood risk)	• New developments containing electric vehicle charging points by land use type. • Number, location, and type of proposals achieving low carbon design.

ISA theme	Proposed monitoring measure
	• Number of decentralised low carbon and renewable energy schemes approved in development. • Approvals of development in Flood Risk Zones 2, 3a, and 3b by use class and flood risk compatibility. • Refusals of development in Flood Risk Zones 2, 3a, and 3b.

APPENDIX 4

Integrated Sustainability Appraisal (ISA) for the Monmouthshire Replacement Local Development Plan (RLDP)

ISA Report accompanying the Deposit Plan

Monmouthshire County Council

September 2024

Delivering a better world

Quality information

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1. Introduction

1.1 Background

1.1.1 AECOM is commissioned to lead on Integrated Sustainability Appraisal (ISA) in support of Monmouthshire County Council's Replacement Local Development Plan (RLDP). ISA fulfils the requirements and duties for Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA), Equalities Impact Assessment (EqIA), Health Impact Assessment (HIA), Welsh Language Impact Assessment (WLIA) and Well-being of Future Generations (WBFG).

1.2 ISA Explained

1.2.1 ISA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives in terms of key sustainability issues. The aim of ISA is to inform and influence the plan-making process with a view to avoiding and mitigating negative impacts and maximising positive impacts. Through this approach, the ISA for the RLDP seeks to maximise the developing plan's contribution to sustainable development.

1.2.2 As identified above, the ISA seeks to fulfil the requirements and duties for SA, SEA, EqIA, HIA, WLIA and WBFG. The approach is to fully integrate these components to provide a single assessment process to inform the development of the RLDP. A description of each of the various components and their purposes is provided below.

1.3 Sustainability Appraisal (SA)

1.3.1 SA is undertaken to address the procedures prescribed by the Environmental Assessment of Plans and Programmes (Wales) Regulations 2004 (the SEA Regulations) which transpose into national law the EU Strategic Environmental Assessment (SEA) Directive[1]. It also widens the scope of the assessment from focusing largely on environmental issues to further consider social and economic issues. SA is a legal requirement for Local Development Plans under Section 19(5) of the Planning and Compulsory Purchase Act 2004.

1.3.2 In line with the requirements of the SEA Directive, the two key steps in SA are that:

1. When deciding on 'the scope and level of detail of the information' which must be included in the SA Report there is a consultation with nationally designated authorities concerned with environmental issues; and
2. A report (the 'SA Report') is published for consultation alongside the Draft Plan that presents an assessment of the Draft Plan (i.e. discusses 'likely significant effects' that would result from plan implementation) and reasonable alternatives.

[1] Directive 2001/42/EC

1.3.3 The LDP Manual Edition 3 (2020) states that SA, incorporating SEA, plays an important part in demonstrating that the LDP is sound by ensuring that it reflects the legislative requirements and achieves sustainable development.

1.4 Equalities Impact Assessment (EqIA)

1.4.1 As a public-sector organisation, Monmouthshire Council has a duty under the Equality Act 2010[2] and associated Public Sector Equality Duty (PSED) to ensure that the objectives and policy options within the RLDP avoid unlawful discrimination (direct and indirect), instead, advancing equality of opportunity and fostering good relations between those with protected characteristics[3] and all others.

1.4.2 In March 2021 the Socio-economic Duty commenced, which compliments the Equalities Act and PSED by further contributing towards Wales' long term well-being goals, in particular "A more equal Wales" and "A Wales of cohesive communities". Further strengthening social partnership arrangements and advancing fair work ambitions.[4]

1.4.3 An Equality Impact Assessment (EqIA) is often used by public sector organisations to demonstrate how this duty has been met.

1.5 Health Impact Assessment (HIA)

1.5.1 The Public Health (Wales) Act 2017 contains a provision to require a Health Impact Assessment (HIA) to be carried out to assess the likely effect of the proposed development plan on health and mental well-being and inequality. The HIA process provides a systematic yet flexible and practical framework that can be used to consider the wider effects of LDP policies and how they, in turn, may affect people's health.

1.6 Welsh Language Impact Assessment (WLIA)

1.6.1 The Welsh Government is committed to supporting the Welsh Language so that it can thrive and grow across Wales. The Welsh Language must be considered from the outset of the development plan process. It is a legislative requirement that the SA must include an assessment of the likely effects of the plan on the use of the Welsh language (The Planning (Wales) Act 2015 (Section 11).

1.6.2 Planning Policy Wales (PPW) (2024) sets the policy requirements for Welsh language. Technical Advice Note 20: Planning and the Welsh Language provides guidance on the consideration of Welsh language as part of the development plan process. The TAN provides advice on incorporating the Welsh language in development plans through the SA and the policy approach to anticipated windfall development. In summary, planning authorities must consider the likely effects of their development plans as part of the SA process and include a statement within the Deposit Plan on how this has been considered and or addressed within the development plan.

[2] Equality Act 2010 [online] available at: http://www.legislation.gov.uk/ukpga/2010/15/contents
[3] Protected characteristics under the Equality Act 2010 include age, sex, marital status, disability, gender reassignment, ethnicity, religion, pregnancy and maternity, sexual orientation and deprived/disadvantaged groups.
[4] Welsh Government (2020) A more equal Wales: strengthening social partnership white paper [online] available at: https://gov.wales/more-equal-wales-strengthening-social-partnership-white-paper

The ISA process is the mechanism for considering how the scale and location of growth, the vision, objectives, policies and proposals individually and in combination, impact on the Welsh language. Where evidence indicates a detrimental impact on the use of the Welsh language the LPA can assess whether the strategy should be amended or mitigation measures should be identified.

1.7 Wellbeing of Future Generations (Wales) Act 2015

1.7.1 The Planning (Wales) Act 2015 sets out the definition of sustainable development for the planning system in Wales, mirroring the definition in the Well-being of Future Generations (Wales) Act 2015 (WBFGA).

1.7.2 “Sustainable development means the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals”.

1.7.3 The WBFGA sets seven well-being goals which all public bodies are required to achieve:

- A prosperous Wales;
- A resilient Wales;
- A healthier Wales;
- A more equal Wales;
- A Wales of cohesive communities;
- A Wales of vibrant culture and thriving Welsh language; and
- A globally responsible Wales.

1.7.4 The Act also identifies five ways of working which public bodies need to demonstrate they have carried out when undertaking their duty to achieve sustainable development. These are: involvement, collaboration, integration, prevention and long term factors. The well-being goals and the five ways of working can be used to inform and structure the ISA framework.

1.8 This ISA Report

1.8.1 This ISA Report[5] is published alongside the Deposit Plan. It leads on from the Initial ISA Report published in November 2022, taking into consideration feedback from consultation and the subsequent updates to the RLDP. Any representations received will be considered when the Plan is finalised for submission.

[5] See **Appendix I** for further explanation of the regulatory basis for answering certain questions within the SA Report; and a ‘checklist’ explaining more precisely the regulatory basis for presenting certain information.

2. What is the RLDP Seeking to Achieve?

2.1 Background

2.1.1 Monmouthshire County Council (MCC) is in the process of preparing a Replacement Local Development Plan (RLDP) for the County (excluding the area within the Brecon Beacons National Park). The RLDP will cover the period 2018-2033 and will be the statutory land use plan to support delivery of the Council's purpose of becoming a zero-carbon County, supporting well-being, health and dignity for everyone at every stage of life. The RLDP will set out land use development proposals for the County and will identify where and how much new development will take place over the Replacement Plan period. It will also identify areas to be protected from development and provide policies against which future planning applications will be assessed. The RLDP builds upon the current adopted LDP which covers the period 2011-2021.

2.2 Issues, Challenges, and Opportunities

2.2.1 The key issues, challenges and opportunities/ drivers facing the County (economic, environmental, social, and cultural) are set out in the RLDP Issues, Vision, and Objectives Paper (updated September 2024). The Issues have been grouped to align with the seven Well-being Goals as set out in the Well-being of Future Generations (Wales) Act 2015 to ensure that they are framed within this context. A summary of the key issues and challenges as set out by the Council are presented below:

- We have the highest average house prices in Wales. This means a large proportion of people cannot afford to buy a home so either leave the County, or have to live with their parents or in shared housing for longer. We have 2,064 households identified as being in need of affordable housing[16]. The RLDP explores opportunities to increase the number of affordable homes and ensure a range and choice of homes, both market and affordable, are incorporated within new developments.
- Our population is getting older. By 2033 we will have more people over the age 65+ living in the County but fewer young people. The 2021 Census identifies that nearly 26% of the population in Monmouthshire is over 65 (compared to 21% in Wales), with 16% under the age of 16 (18% in Wales) and just over 58% of working age (16-64) (61% in Wales). An older population changes the kind of services our communities will need, but also reduces the number of people using and financially supporting businesses and services. We will have a smaller economically active population making Monmouthshire a less attractive place for businesses to locate. This impacts on our future economic prospects. By increasing the supply of affordable housing we can retain a larger number of younger people in the County, increasing the sustainability of our economy and public services.
- The Council has declared a climate and nature emergency and has set out a commitment to strive to reduce its own carbon emissions to net zero

in line with the Welsh Government target of 2030, together with a strengthened emphasis on nature recovery. The RDLP provides the land use policy framework to address the climate and nature emergency together, seeking outcomes that recognise the role resilient ecosystems can play in tackling carbon emissions and mitigating the impact of climate change. The RLDP establishes policy to support and enable renewable energy generation and sets out the requirements for net zero carbon developments and other sustainable development principles such as active travel, green infrastructure and local food production. These sit alongside and integrate with policies for protection of sites designated for biodiversity, habitats and species and deliver on Net Biodiversity Benefit. The requirement that all future housing is net zero carbon is intended to reduce overall carbon emissions. The requirement that new strategic sites for housing are within walking distance of existing town centres is also intended to reduce carbon emissions.

- We have an urgent need to tackle water quality and phosphate pollution in our rivers. Natural Resources Wales (NRW) has adopted tighter targets for river water quality and have put in place a requirement to achieve phosphate neutrality or betterment in the River Usk and River Wye. In recognition of the water quality issues in the County, the Climate and Nature Emergency Strategy and associated action plans outline steps the Council will take to protect our rivers and ocean.
- There is a need to consider whether existing employment land is suitably located and fit for purpose, along with the potential increase in agile and home working and the impact this may have on employment land demand/requirements. We also need to consider future demand in line with Council aspirations and the opportunities that a shift in working behaviour could create with businesses given greater flexibility over where to locate.
- Monmouthshire benefits from its involvement in regional partnerships including the Cardiff Capital Region City Deal, Marches Forward Partnership and The Western Gateway. Opportunities associated with such partnership working include economic investment/innovation and transport and digital connectivity. Further details are provided in Appendix 3.
- Unemployment levels are low; however, Monmouthshire has a dual economy. The qualifications, skills and earnings of the residents are above the regional and national average, however, for those working in the area earnings are lower and employment is relatively less skilled. Monmouthshire has a net-outflow of commuters. Those who commute out of the County are higher earners than those who commute into the County. To address these issues there is a need to provide support for inward investment and local employment growth/opportunities as identified in the Economy, Employment and Skills Strategy.
- Vacancy rates in some of the County's town and local centres have increased[17] due to changing shopping habits including internet shopping and economic factors such as inflation diminishing the disposable income of many households.

- There are challenges of rural isolation and sustaining rural communities, including regenerating the rural economy. The pandemic emphasised the value and importance of having locally accessible services and facilities.
- We want to protect the landscapes and heritage that make Monmouthshire a unique and attractive place to live. The RLDP recognises the value and importance of placemaking and the provision of locally accessible open/spaces for health and well-being and recreation.
- Tourism plays a significant part in the Monmouthshire economy particularly in assisting in the diversification of the rural economy and in sustaining the County's historic town centres. According to figures supplied by tourism economic indicator STEAM (Scarborough Tourism Economic Activity Monitor), the sector brought in £285m to Monmouthshire in 2022 and supported the equivalent of 3,356 full-time jobs (STEAM report 2022).

2.2.2 The key opportunities to realising some of the issues/ challenges are set out overleaf.

Future Wales: The National Plan 2040 (February 2021)

2.2.3 Future Wales sets out the national development framework and direction for development in Wales to 2040, it contains a number of policies that are considered to be of particular relevance to Monmouthshire providing the national policy context to address key issues facing Monmouthshire.

2.2.4 Policy 3 – Supporting Urban Growth and Regeneration - Public Sector Leadership - sets out that Welsh Government will play an active role in the delivery of growth and urban regeneration, working with local authorities to unlock the potential of public land and support local authorities to take an increased development role. Of note Policies 4 – Supporting Rural Communities and Policy 5 – Supporting the Rural Economy, provide the policy framework to consider how age balanced communities can be achieved, where depopulation should be reversed and allowing for sustainable, appropriate and proportionate economic growth. Policy 7 – Delivering Affordable Homes, also addresses the key issue of affordable housing prices in the County and provides the framework to address this through affordable housing led developments. These policies are considered to provide significant opportunities to address a number of the key issues facing the County.

Building Better Places: The Planning System Delivering Resilient and Brighter Futures. Placemaking and the Covid-19 Recovery (July 2020)

2.2.5 The Covid-19 pandemic has resulted in many challenges, but it is has also resulted in some significant changes in how we operate our daily lives and use the neighbourhood spaces around us. Welsh Government's Building Better Places Covid-19 recovery policy document recognises this, and the opportunity it has created to continue with some of the shifts in behaviour and the increased importance on placemaking that have been highlighted as a result of Covid-19. In this respect, the RLDP is recognised as a key mechanism in delivering the planning policy priorities identified in the

Building Better Places document to assist in the Covid-19 recovery and maintaining and enabling the sustainable improvements that have arisen from the situation. Examples include greater emphasis on creating neighbourhoods that enable residents to stay and move locally to access most services and amenities through revitalised town centres and the provision of locally accessible green spaces. Similarly, the importance of digital connectivity and necessity to incorporate sufficient infrastructure in developments from the outset has been highlighted, particularly in rural areas.

Climate and Nature Emergency and Motion for the Rivers and Ocean

2.2.6 In May 2019, the Council declared a Climate Emergency and published an updated Climate and Decarbonisation Strategy and Action Plan in November 2021, with strengthened emphasis on nature recovery in recognition of the nature emergency. This sets out key actions the Council will take to reduce its own carbon emissions to net zero in line with Welsh Government's target of 2030, but also make a commitment to work with partners and organisations to develop and implement best practice in limiting global warming to less than 1.5^{o}C. As recognised by PPW12 and Building Better Places, the RLDP and its policy framework and allocations provide a significant opportunity to address the causes and effects of climate change. It is recognised that efforts to tackle climate change are wide-ranging and will require a co-ordinated approach to development including aspects such as active travel, green infrastructure, effective use of land and resources and flood resilience.

2.2.7 In recognition of urgent need to address water quality in the County the Climate Emergency Action Plan November 2021 update, included the addition of an action on addressing water quality, establishing the requirement to prepare an action plan specifically on water quality. In March 2022 the Motion for the Rivers and Ocean was agreed by Council with the associated Action Plan agreed in September 2022. This sets out measures and to tackle river quality and the partnerships in place to provide a co-ordinated approach to the issue. Of particular relevance to the RLDP is the ongoing work with NRW and Welsh Water and continued involvement with the Wye Nutrient Management Board and the Usk Catchment Partnership to identify and implement options for delivering improvements in water quality.

Cardiff Capital Region City Deal

2.2.8 The overarching economic objectives of the City Deal are to create 25,000 new jobs and leverage £4 billion in private sector investment across the region. Key themes have been identified to focus the approach: Connecting the Region; Regeneration and Infrastructure; Skills and Employment. These strategic themes present opportunities for the RLDP including:

- Connecting the Region – Digital Strategy: this aims to create a smart region, driving innovation and solutions to attract private sector partnership and investment, including Welsh and regional connectivity, mobile 5G access and maximising open data.

- Metro – the South East Wales Metro Project provides much needed opportunities to increase train service frequency, improve inter-modal connectivity and coordination, streamline ticketing and improve bus services.
- Regeneration and Infrastructure – the Housing and Investment Fund supports the delivery of more homes across the region. This includes assistance in stimulating the SME sector across the region by providing loan development finance and launching a Customer Build Scheme releasing smaller plots of public sector land with a full package of support for SMEs to deliver new homes.
- Skills and Employment – the Skills for the Future Project provides region-wide school engagement with pupils and parents to offer careers advice and guidance, support for businesses to address barriers of participation, including a skills investment fund and a commitment to support delivery of over 10,000 additional apprenticeships, graduate internships and upskilled employees in the private sector.

Monmouthshire 2040: Our Economic Growth and Ambition Statement and Inward Investment Prospectus 2020: Growing your Business in Monmouthshire

2.2.9 The Council's Economic Growth and Ambition Statement and Prospectus set out the aspirations to raise the profile of Monmouthshire as a dynamic place to do business, a credible place to invest and an incredible place to live, visit and stay. It recognises that Monmouthshire's economy needs to grow to help build sustainable and resilient communities and to achieve the Community and Corporate Plan (April 2023) objective of being a thriving and ambitious place, where there are vibrant town centres, where businesses can grow and develop.

2.2.10 The Economic Growth and Ambition Statement and accompanying Prospectus and emerging Economic Development Strategy will work alongside the RLDP and will assist in:

- Raising the profile of Monmouthshire as a key investment opportunity for the private sector.
- Attract funding and investment to Monmouthshire to attract and facilitate economic growth to the County.
- Increasing the take up of apprenticeships and reducing the number of residents who are not in education, employment or training.
- Increasing next generation access broadband and mobile phone coverage across the County.

2.3 Vision and Objectives of the RLDP

2.3.1 The RLDP Vision outlines how the County is planned to develop, change, or be conserved up to 2033, and provides the framework for the Plan's strategy and policies. The Vision set out in the adopted LDP 2011-2021 has been reviewed and updated to take account of the issues, challenges and opportunities facing the County, key elements of the Gwent PSB Well-being

Plan (August 2023) and MCC's Taking Monmouthshire Forward - Community and Corporate Plan 2022-2028 (April 2023).

By 2033 Monmouthshire will be home to well-connected, exemplar affordable housing-led, net zero carbon places that provide employment and support demographically balanced sustainable and resilient communities for all, where:

- ***People are living in inclusive, equal, safe, cohesive, prosperous, and vibrant communities. Both urban and rural areas are well-connected with better access to local services and facilities, open space, and employment opportunities.***
- ***Communities and businesses are part of an economically thriving, ambitious, and well-connected County.***
- ***The best of the County's built heritage, countryside, biodiversity, landscape, and environmental assets have been protected and enhanced to retain its distinctive character.***
- ***People enjoy healthier, more sustainable lifestyles with improved access to public transport and active travel opportunities and have a minimised impact on the global environment, supporting our ambitions for a zero-carbon County.***

2.3.2 To address the key issues/ challenges and deliver the vision, 17 objectives have been developed for the RLDP, which build upon the Adopted LDP objectives. The objectives are kept under review and updated as necessary as part of the continued development of the RLDP evidence base.

2.3.3 The objectives are set out in Table 2.1 and have been grouped to align with the 7 wellbeing goals set out in the Wellbeing of Future Generation (Wales) Act 2015, and the RLDP issues, as well as the main policy themes identified in Planning Policy Wales (PPW12), the Gwent PSB Wellbeing Plan steps, and the Council's Community and Corporate Plan.

Table 2.1: RLDP objectives and their contributions to wellbeing goals

RLDP Objective	Headline	RLDP Objective	RLDP issues addressed[6]	Main PPW12 theme	Gwent PSB Well-being Plan Steps	Community & Corporate Plan Objectives
A Prosperous Wales (Well-being Goal 1)						
Objective 1	Economic Growth/ Employment	To support a thriving, well-connected, diverse economy, which provides a range of good quality employment opportunities to enable and encourage indigenous business growth and attract inward investment and competitive innovative businesses in appropriate growth sectors, including through the provision of start-ups and grow on spaces.	1, 2, 3, 4, 5, 6, 7, 24	Productive and enterprising places	Take action to reduce the cost-of-living crisis in the longer term.	A Thriving and Ambitious Place.
Objective 2	Town and Local centres	To sustain and enhance the centres of Abergavenny, Caldicot, Chepstow, Magor, Monmouth, and Usk as vibrant and attractive centres serving the needs of their population and those of their surrounding hinterlands, and supporting adaptation to meet the needs of the evolving role of the high street.	8	Active and social places	Take action to address inequities, particularly in relation to health, through the framework of the Marmot Principles. Enable and support people, neighbourhoods,	A Thriving and Ambitious Place.

[6] See Appendix 1 of the Preferred Strategy for the full list of RLDP issues.

RLDP Objective	Headline	RLDP Objective	RLDP issues addressed[6]	Main PPW12 theme	Gwent PSB Well-being Plan Steps	Community & Corporate Plan Objectives
					and communities to be resilient, connected, thriving and safe.	
A Resilient Wales (Well-being Goal 2)						
Objective 3	Green Infrastructure, Biodiversity and Landscape	To protect, enhance and manage the resilience of Monmouthshire's natural environment, biodiversity and ecosystems and the connectivity between them, while at the same time maximising benefits for the economy, tourism, health, and well-being. This includes the Wye Valley National Landscape (AONB), the County's other high quality and distinctive landscapes, protected sites, protected species and other biodiversity interests.	11, 12, 35	Distinctive and natural places	Take action to reduce our carbon emissions, help Gwent adapt to climate change, and protect and restore our natural environment.	A Green Place to Live.
Objective 4	Flood risk	To ensure that new development takes account of the risk of flooding, both existing and in the future, including the need to avoid inappropriate development in areas that are at risk from flooding or that may increase the risk of flooding elsewhere and the need	12, 13	Distinctive and natural places	Take action to reduce our carbon emissions, help Gwent adapt to climate change, and protect and restore	A Green Place to Live.

RLDP Objective	Headline	RLDP Objective	RLDP issues addressed[6]	Main PPW12 theme	Gwent PSB Well-being Plan Steps	Community & Corporate Plan Objectives
		to design development, including the use of natural flood management measures to appropriately manage flood risk and surface water run-off.			our natural environment.	
Objective 5	Minerals and Waste	To meet the County's regional and local obligations to manage and dispose of its waste and to safeguard and exploit its mineral resource in a sustainable fashion.	14, 15	Productive and enterprising places	Take action to reduce our carbon emissions, help Gwent adapt to climate change, and protect and restore our natural environment.	A Green Place to Live.
Objective 6	Land	To promote the efficient use of land, including the need to: • maximise opportunities for development on previously developed land, whilst recognising that brownfield opportunities are limited in Monmouthshire. • protect the best and most versatile (BMV) agricultural land whilst at the same time recognising that this will not always be possible given high proportion of BMV land in the County and the limited opportunities for brownfield development.	16, 17	Strategic and spatial choices	Take action to reduce our carbon emissions, help Gwent adapt to climate change, and protect and restore our natural environment.	A Green Place to Live.

RLDP Objective	Headline	RLDP Objective	RLDP issues addressed[6]	Main PPW12 theme	Gwent PSB Well-being Plan Steps	Community & Corporate Plan Objectives
		• support the adaptation and re-use of existing sustainably located buildings.				
Objective 7	Natural resources	To ensure the efficient use of natural resources including providing increased opportunities for water efficiency, energy efficiency, renewable energy, recycling and waste reduction.	14, 15, 31, 37	Productive and enterprising places	Take action to reduce our carbon emissions, help Gwent adapt to climate change, and protect and restore our natural environment.	A Green Place to Live. A Safe Place to Live.
A Healthier Wales (Well-being Goal 3)						
Objective 8	Health and Well-being	To improve access for all to recreation, sport, leisure activities, open space, and the countryside and to enable healthier lifestyles. To support the Health Board to improve health infrastructure to meet community needs.	18, 20, 21, 33, 35	Active and social places	Take action to address inequities, particularly in relation to health, through the framework of the Marmot Principles.	A Fair Place to Live. A Safe Place to Live. A Connected Place Where People Care.
A More Equal Wales (Well-being Goal 4)						

RLDP Objective	Headline	RLDP Objective	RLDP issues addressed[6]	Main PPW12 theme	Gwent PSB Well-being Plan Steps	Community & Corporate Plan Objectives
Objective 9	Demography	To increase opportunities for the younger population to both live and work within Monmouthshire, creating a more balanced demography and socially and economically sustainable communities.	2, 3, 4, 5, 24	Active and social places	Enable and support people, neighbourhoods, and communities to be resilient, connected, thriving and safe.	A Fair Place to Live. A Thriving and Ambitious Place. A Safe Place to Live.
A Wales of Cohesive Communities (Well-being Goal 5)						
Objective 10	Housing	To provide urgently needed affordable housing within exemplar, mixed, sustainable, and well-connected places both for existing and future residents.	23, 25, 26, 27, 28	Active and social places	Provide and enable the supply and good quality, affordable, appropriate homes.	A Fair Place to Live. A Safe Place to Live.
Objective 11	Place-making	To create exemplar sustainable places through design, layout and mix of uses that enhance the character and identity of Monmouthshire's settlements and landscape; create attractive, safe, and accessible places to live, work and visit; and promote people's prosperity, health, happiness, and well-being.	1, 11, 12, 18, 20, 27, 28, 29, 30, 31, 32, 34, 35	Strategic and spatial choices	Enable and support people, neighbourhoods, and communities to be resilient, connected, thriving and safe.	A Thriving and Ambitious Place. A Safe Place to Live.

RLDP Objective	Headline	RLDP Objective	RLDP issues addressed[6]	Main PPW12 theme	Gwent PSB Well-being Plan Steps	Community & Corporate Plan Objectives
Objective 12	Communities	To ensure Monmouthshire is a connected place where people feel part of a community, are valued, and have good access to education, employment, shops, housing, public transport, active travel, healthcare, community and cultural facilities.	1, 5, 7, 8, 9, 18, 20, 25, 26, 27, 29, 30, 31, 33, 35	Strategic and spatial choices	Enable and support people, neighbourhoods, and communities to be resilient, connected, thriving and safe.	A Fair Place to Live. A Green Place. A Thriving and Ambitious Place. A Safe Place to Live. A Connected Place Where People Care. A Learning Place.
Objective 13	Rural Communities	To sustain existing rural communities as far as possible by providing affordable homes and development opportunities of an appropriate scale and location in rural areas in order to assist in building sustainable rural communities and strengthening the rural economy.	6, 7, 20, 22, 26, 29, 30, 34	Productive and enterprising places	Provide and enable the supply of good quality, affordable, appropriate homes.	A Fair Place to Live. A Safe Place to Live.
Objective 14	Infrastructure	To ensure that appropriate physical and digital infrastructure (including community and recreational facilities, education, sewerage, water, transport, health care and broadband etc.) is in	12, 19, 20, 31	Productive and enterprising places	Enable and support people, neighbourhoods, and communities to be resilient,	A Green Place to Live. A Thriving and Ambitious Place.

RLDP Objective	Headline	RLDP Objective	RLDP issues addressed[6]	Main PPW12 theme	Gwent PSB Well-being Plan Steps	Community & Corporate Plan Objectives
		place or can be provided to accommodate new development.			connected, thriving and safe.	A Connected Place Where People Care. A Learning Place.
Objective 15	Accessibility	To seek to reduce the need to travel by promoting a mix of land use allocations and improved internet connectivity, and where travel is required, to provide opportunities for active travel and integrated sustainable transport above use of the private car.	10, 30, 36	Active and social places	Enable and support people, neighbourhoods, and communities to be resilient, connected, thriving and safe.	A Green Place to Live. A Thriving and Ambitious Place.
A Wales of Vibrant Culture & Thriving Welsh Language (Well-being Goal 6)						
Objective 16	Culture, Heritage and Welsh Language	To protect and enhance the built environment, culture and heritage of Monmouthshire for the future while maximising benefits for the economy, tourism and social well-being, including supporting and safeguarding the Welsh Language.	9, 32, 33, 34, 35	Distinctive and natural places	Enable and support people, neighbourhoods, and communities to be resilient, connected, thriving and safe.	A Fair Place. A Thriving and Ambitious Place. A Connected Place Where People Care.

RLDP Objective	Headline	RLDP Objective	RLDP issues addressed[6]	Main PPW12 theme	Gwent PSB Well-being Plan Steps	Community & Corporate Plan Objectives
						A Learning Place.
A Globally Responsible Wales (Well-being Goal 7)						
Objective 17	Climate and Nature Emergency	To strive to limit the increase in global temperatures to 1.5ºC, supporting carbon reduction through a variety of adaptation measures including facilitating resilient ecosystems and nature recovery, the use of renewable energy, net zero homes, the design and location of new development, encouraging balanced job and population growth to reduce out-commuting, the provision of broadband connectivity to reduce the need to travel, the provision of ultra-low emission vehicle charging infrastructure to reduce emissions and improve air quality, and the provision of quality green infrastructure.	10, 12, 36, 37, 38	Distinctive and natural places	Take action to reduce our carbon emissions, help Gwent adapt to climate change, and protect and restore our natural environment.	A Green Place to Live. A Thriving and Ambitious Place. A Safe Place to Live.

3. What is the Scope of the ISA?

3.1 Introduction

3.1.1 The aim here is to introduce the reader to the scope of the ISA, meaning the sustainability issues/ objectives that should be a focus of (and provide a broad methodological framework for) ISA.

3.2 Consultation on the Scope of the ISA

3.2.1 The Regulations require that "*When deciding on the scope and level of detail of the information that must be included in the Environmental Report, the responsible authority shall consult the consultation bodies*". In Wales, the consultation bodies are Natural Resources Wales and Cadw.[7] A Scoping Report was sent to the statutory consultees for comment from 26th October to 30th November 2018. The responses received were considered and amendments made to the baseline information and draft ISA Objectives where necessary. Since that time, the ISA scope has evolved as new evidence has emerged and there have been some minor refinements to the ISA objectives - however, the scope remains fundamentally like that agreed through the dedicated scoping consultation in 2018. Baseline updates, such as new Census data, have been considered through the subsequent assessment process.

3.2.2 Further information on the scope of the ISA - i.e., a more detailed review of sustainability issues/ objectives as highlighted through a review of the sustainability 'context' and 'baseline' – is available to view separately via MCC.

3.3 ISA Objectives

3.3.1 Table 3.1 presents the ISA objectives - grouped under ten theme headings - established through scoping, considering context/baseline review, identified key issues and responses from statutory consultees.

3.3.2 Taken together, the ISA themes and objectives presented in Table 3.1 provide a methodological 'framework' for appraisal.

Table 3.1: ISA Framework

ISA theme	ISA objective
Economy and Employment	Deliver sustainable economic growth by strengthening the local economy, promote tourism and enhance the vitality and viability of town centres.
	Increase the range and quality of employment opportunities within Monmouthshire to meet identified needs.

[7] In accordance with Article 6(3).of the SEA Directive, these consultation bodies were selected because *'by reason of their specific environmental responsibilities,[they] are likely to be concerned by the environmental effects of implementing plans and programmes.'*

ISA theme	ISA objective
Population and Communities	Provide a sufficient quantity of good quality housing in a range of types and tenures that allows people to meet their housing needs and supports economic growth and prosperity.
	Through place-making and sustainable design maintain and enhance the visual character and distinctiveness of the built environment to create great places to live. Support and promote the distinctive character of local communities.
Health and well-being	To improve physical and mental health and wellbeing by encouraging healthier lifestyles, quality living environments and community safety.
Equalities, diversity, and social inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.
Transport and Movement	To improve access for all to jobs, services and facilities in a way that reduces reliance on car use through improving infrastructure and promoting active travel, whilst also ensuring access to high quality digital communications and utilities.
Natural Resources (Air, Land, Minerals and Water)	To reduce all forms of air pollution in the interests of improving local air quality.
	To use land efficiently by prioritising development on previously developed land, using existing land efficiently and protecting where possible higher grade agricultural land.
	To ensure that primary materials and minerals are managed in a sustainable way, including through the implementation of a circular economy by waste reduction, re-use, and recycling.
	To maintain and improve the quality of ground, surface and coastal waters and the quantity of water available including potable water supplies, ground water and river levels.
Biodiversity and Geodiversity	To conserve, protect and enhance biodiversity and geodiversity within and surrounding Monmouthshire.
Historic Environment	To conserve and enhance the significance of the County's historic environment, cultural assets (including the use of the Welsh language) and heritage assets and their settings.
Landscape	To protect and enhance the quality and character of the best of Monmouthshire's landscape, including its contribution to the setting and character of settlements.

ISA theme	ISA objective
Climate Change	To promote and encourage energy generation from renewable sources and energy efficiency.
Flood Risk	Ensure that new development is designed and located to avoid the risk of flooding and ensure the risk of flooding is not increased elsewhere.

4. Plan-making and ISA to Date

4.1 Regulatory Requirements

4.1.1 In line with regulatory requirements, there is a need to explain how work undertaken to date has informed plan-making, in particular, how work has been undertaken to develop and then appraise reasonable alternatives, and how the Council have considered appraisal findings when developing the preferred approach for the RLDP. This information is important given regulatory requirements.[8]

4.2 Structuring the Work to Date

4.2.1 A review of the LDP has been underway since 2018, with a wide range of evidence produced to inform plan-making. Table 4.1 sets out the key RLDP and ISA documents published to date, along with dates for consultation. The RLDP documents and the evidence base (including the ISA Reports) can be viewed and downloaded on the Council's website.[9]

Table 4.1: RLDP and ISA documents published to date

RLDP Documents and Consultation	ISA Documents and Consultation
	ISA Scoping Report 2018 - Sent to statutory consultees for consultation from 26th October to 30th November 2018.
Issues, Vision, and Objectives Paper (January 2019 as amended June 2021)	
Growth and Spatial Options Consultation Paper - Public consultation from July to August 2019	
Preferred Strategy Public consultation from 09 March to 22 April 2020 (Consultation paused due to Covid-19. Consultation was ceased following advice from the Minister for Housing and Local Government (7th July 2020)	Initial ISA Report and NTS 2020 Public consultation from 09 March to 22 April 2020 (Consultation paused due to Covid-19. Consultation was ceased following advice from the Minister for Housing and Local Government (7th July 2020))
RLDP Review of Issues, Vision, Objectives and Evidence Base in light of Covid-19 (September 2020) This Review was agreed by Council on 22 October 2020 and submitted to the Welsh Government in accordance with Ministerial advice	

[8] There is a requirement for the ISA Report to present an appraisal of 'reasonable alternatives' and 'an outline of the reasons for selecting the alternatives dealt with'.
[9] Replacement Local Development Plan (RLDP) - 2018-2033 - Monmouthshire

RLDP Documents and Consultation	ISA Documents and Consultation
Revisited RDLP Growth and Spatial Options Consultation Paper Public consultation from January to February 2021	ISA of Strategic Options Report 2021 Public consultation January to February 2021
Sustainable and Resilient Communities Preferred Strategy Public consultation from July to August 2021	Initial ISA Report and NTS 2021 Public consultation from July to August 2021
Preferred Strategy, December 2022 Public consultation from December 2022 to January 2023	Initial ISA Report and NTS 2022 Public consultation from December 2022 to January 2023

4.2.2 With a number of Initial ISA Reports published to date, this ISA Report sets out the work that has been undertaken to develop and appraise reasonable alternatives, considering feedback from consultation at each stage and subsequent changes to the preferred strategy.

4.2.3 For clarity, **Chapter 5** details how reasonable alternatives have been established considering the available evidence and feedback from consultation, **Chapter 6** presents a summary of the appraisal of reasonable alternatives (with detailed appraisals provided in appendices), and **Chapter 7** explains the Council's reasons for selecting the preferred approach.

5. Establishing Reasonable Alternatives

5.1 Introduction

5.1.1 This chapter explains the evidence and work carried out to date to identify strategic options, or reasonable alternatives. To deliver the vision and objectives detailed in Chapter 2, the Council have explored **how much growth** (housing and employment) is required over the plan period (2018-2033) and **where this growth could be located** in the County. Each of these issues are discussed in turn below.

5.2 Level of growth options (2020)

5.2.1 In early development stages of the RLDP, Monmouthshire, Torfaen, and Blaenau Gwent County Councils jointly commissioned Edge Analytics to prepare a range of demographic, housing, and employment growth scenarios to inform the RLDP. A total of 20 different demographic-led, housing-led, and employment-led scenarios were generated for Monmouthshire. From these, eight growth options were selected for consultation, comprising of 2 low, 3 medium, and 3 high growth options, as set out in the Growth and Spatial Options Paper (June 2019), which was published for consultation from July to August 2019.

5.2.2 The Council took time to consider these options, consultation responses received, and informal feedback from Welsh Government officials; which indicated a lack of confidence in economic-led projections and a concern regarding ambitious LDPs. A decision was subsequently taken to commission Edge Analytics to model an additional demographic-led scenario. This scenario sought to address two of the key issues/ challenges facing the County in relation to retaining/ attracting younger adult population age groups and improving labour force retention.

5.2.3 The eight growth options identified in the June 2019 Consultation Paper together with the additional scenarios modelled by Edge Analytics (Growth Option 5A and Option 5A+) were assessed through the ISA in early 2020. For the purposes of the ISA process, the ten growth options were grouped together into three distinct options (Option 1 (Low Growth), Option 2 (Medium Growth), and Option 3 (High Growth)) to allow for a proportionate and meaningful appraisal to be carried out. An appraisal of the three grouped options were presented in the Initial ISA Report and consulted upon in March 2020.

5.3 Level of growth options (2021)

5.3.1 The Council revisited the Growth and Spatial Options stage of the RLDP process later in 2020 due to the publication of updated key evidence. Namely, in August 2020 the Welsh Government published corrected 2018-based population and household projections.

5.3.2 The latest Welsh Government local authority level Household Projections for Wales, alongside the latest Local Housing Market Assessment (LHMA) and

the Well-being plan for a plan area, form a fundamental part of the RDLP evidence base. These were considered together with other key evidence in relation to issues such as what the plan is seeking to achieve, links between homes and jobs, the need for affordable housing, Welsh language considerations and the deliverability of the plan, in order to identify an appropriate strategy for the delivery of housing in the plan area.

5.3.3 The 2020 publication of corrected Welsh Government 2018-based population and household projections comprised important new evidence that required consideration to ensure that the evidence base for the RLDP is robust and based on the most up to date information.

5.3.4 To take account of the latest evidence, an Updated Demographic Evidence Report (November 2021) was prepared by Edge Analytics, which set out a range of updated growth options for the RLDP.[10]

5.3.5 A total of fourteen different scenarios were generated for Monmouthshire, together with further sensitivity testing for all of the demographic and dwelling-led scenarios with regard to household formation and commuting ratios. From these fourteen different scenarios, six growth options were selected for further testing through the ISA. In addition to the initial modelling, all six selected options were the subject of additional testing to establish the impact on demography, dwellings, and household formation and employment of an affordable-housing policy-led strategy.

5.3.6 The six growth options identified in the Growth and Spatial Options Paper (December 2020) were assessed through the ISA in early 2021. The assessment of these options was presented in the Initial ISA Report which accompanied the consultation on the 'Sustainable and Resilient Communities Preferred Strategy' in Summer 2021.[11]

5.4 Level of growth options (2022)

5.4.1 Following consultation on the Preferred Strategy in 2021, a number of challenges arose which impacted on the progression of the RLDP and required further consideration. In terms of the level of growth, Welsh Government (WG) raised significant concerns regarding the proposed level of growth and the Strategy's 'general conformity' with policies 1 and 33 of Future Wales: The National Plan 2040. This suggested that growth in Monmouthshire would undermine growth in the national growth area of Cardiff, Newport, and the Valleys.

5.4.2 WG's consultation response took the unprecedented step of prescribing a maximum growth of 4,275 dwellings for Monmouthshire to 2033. This is considerably lower than the Preferred Strategy dwelling requirement that was consulted on (7,605 dwellings) and would result in barely any new housing allocations over RLDP period due to the existing housing landbank.

5.4.3 MCC considered that this approach would fail to deliver on key locally evidenced issues and objectives including affordable housing delivery, economic growth/prosperity and rebalancing the demography, to the

[10] https://www.monmouthshire.gov.uk/planning-policy/development-of-an-evidence-base/
[11] AECOM (2021) ISA for the Monmouthshire Replacement Local Development Plan https://www.monmouthshire.gov.uk/app/uploads/2021/07/Monmouthshire-Initial-ISA-Report-NTS-June-2021.pdf

detriment of the sustainability of the County's communities. MCC also felt it would fail to accord with policies 4, 5 and 7 of Future Wales: The National Plan 2040, which specifically support rural communities and seek to increase the delivery of affordable homes throughout Wales.

5.4.4 On 14th December 2021, a special meeting of the Council's Economy and Development Select Committee considered the implications of the WG Planning Division's response on Monmouthshire's communities and on addressing the locally evidence-based outcomes and objectives.

5.4.5 MCC considered that the WG letter poses a significant challenge for the Preferred Strategy. Namely, that an amended RLDP that follows the letter's requirements would not meet the tests of soundness at examination because it would not address the evidence-based issues or achieve the required outcomes. Conversely, proceeding as originally proposed would also be a high-risk strategy.

5.4.6 Consequently, MCC considered revised growth options which support lower dwelling requirements. These options were subject to appraisal in the Initial ISA Report 2022, alongside the growth strategy consulted on in 2021. These options are summarised below:

- **Option 1**: Existing Preferred Strategy growth level of 7,605 new dwellings over the entire plan period alongside the creation of 7,215 new jobs.
- **Option 2**: Demographic led strategy growth level of 5,400 new dwellings over the entire plan period alongside the creation of 6,240 new jobs.
- **Option 3**: WG prescribed growth level of 4,280 new dwellings over the entire plan period alongside the creation of 4,290 new jobs.

5.5 Feedback from consultation and level of growth options in 2024

5.5.1 In 2022, the Council's preferred approach was Option 2 as this would reduce the level of growth proposed compared to the 2021 Preferred Strategy which WG objected to, whilst also ensuring that the RLDP delivers on the Council's objectives and addresses the core issues of delivering much needed affordable housing and retaining young people with access to new jobs.

5.5.2 At this stage (in 2024) no new evidence has emerged or is being considered that changes the alternatives developed in 2022 and these three options remain valid and up to date for the purposes of this ISA Report. The summary of the appraisal of these options is presented in Chapter 6.

5.6 Location of growth options (2020)

5.6.1 A total of eight Spatial Options were initially considered and included in the long list of spatial options (set out in Appendix 4 of the Growth and Spatial Options Consultation Paper, July 2019) but three were discounted prior to consultation as they were not considered to be genuinely realistic options. Accordingly, five spatial options were consulted on as part of the Growth and Spatial Options Consultation. Subsequent to this, as with the growth options, two additional spatial options were identified in light of consultation

responses and emerging national policy at the time. Following on from this, a total of seven spatial options were considered through the ISA process in early 2020.

5.7 Location of growth options (2021)

5.7.1 As highlighted above, the Council revisited the Growth and Spatial Options stage of the RLDP process in 2020 following the publication of the corrected Welsh Government 2018-based population and household projections (August 2020). The RLDP spatial options considered in 2020 were reassessed to identify suitable options for consideration as part of this process. Two of the options considered in the 2020 consultation included a new settlement. These options were subsequently discounted as the Welsh Government deemed them contrary to national policy set out in PPW (Edition 11), which states new settlements should only be proposed as part of a joint LDP, SDP or the NDF. An additional option, focusing growth in the north of the County, was subsequently included as a result of consultation responses on the 2020 Growth and Spatial Options.

5.7.2 A total of four broad Spatial Distribution Options were therefore taken forward as realistic options for ISA in 2021 which explored a continuation of the existing LDP strategy, proportionately distributed growth, growth focused on the M4 corridor, and growth focused in the north of the County. The assessment of these options was presented in the Initial ISA Report which accompanied the consultation on the 'Sustainable and Resilient Communities Preferred Strategy' in Summer 2021.[12]

5.8 Location of growth options (2022)

5.8.1 Following consultation on the Preferred Strategy in 2021, a number of challenges arose which impacted on the progression of the RLDP and require further consideration. In terms of the spatial strategy, this specifically referred to the environmental impacts of phosphate in watercourses.

5.8.2 In light of new evidence, Natural Resources Wales (NRW) adopted tighter targets for the water quality of watercourses and conducted an assessment of the nine riverine Special Areas of Conservation (SAC) in Wales. This assessment established that phosphorus breaches are widespread within Welsh SAC rivers with over 60% of waterbodies failing against the new targets. Within Monmouthshire, NRW identified that within the River Usk, 88% of the river's water bodies failed to meet the required target and within the River Wye, 67% of the river's water bodies failed to meet the required target.

5.8.3 In response, NRW issued detailed planning guidance to ensure that the environmental capacity of the rivers does not deteriorate any further. Any proposed development within the affected catchment areas of the rivers Usk and Wye that might increase phosphate levels need to clearly evidence that the development can demonstrate phosphate neutrality or betterment in its

[12] AECOM (2021) ISA for the Monmouthshire Replacement Local Development Plan https://www.monmouthshire.gov.uk/app/uploads/2021/07/Monmouthshire-Initial-ISA-Report-NTS-June-2021.pdf

design and/ or its contribution to the water body. This issue affects the upper (non-tidal) parts of the two rivers.

5.8.4 The phosphates water quality issue affecting the River Wye and River Usk had implications for the progression of the RLDP as the Preferred Strategy that was consulted on in 2021 directed future growth to a number of key sustainable settlements within these affected catchment areas. Further consideration was, therefore, given as to how the RLDP can progress in light of this issue, carefully balancing the need for growth with the climate and nature emergency.

5.8.5 Following discussions with Dŵr Cymru/ Welsh Water (DCWW) and NRW, MCC realised that whilst a workable solution to this water quality issue is achievable for the Llanfoist Waste Water Treatment Works (WWTW) (River Usk catchment), there was no identified strategic solution for phosphate mitigation at the Monmouth WWTW (River Wye catchment) in 2022 that could be implemented during the Plan period.

5.8.6 Without an identified deliverable solution, it would not be possible to demonstrate at examination that sites in the Upper Wye Catchment are deliverable. This means that new site allocations for future growth could not be directed to settlements within the affected Wye catchment area, including the primary settlement of Monmouth, until a feasible solution is identified that can be implemented within a timescale that facilitates development within the Plan period. The restrictions on new housing and employment development in this area during the Plan period had obvious implications for the RLDP spatial strategy.

5.8.7 Consideration was therefore given to how to progress the RLDP having regard to the above challenges, whilst also ensuring that the RLDP delivers on the Council's objectives and core issues.

5.8.8 MCC subsequently developed a spatial option which did not direct growth to settlements within the affected Wye catchment area, including the primary settlement of Monmouth. This option, alongside the spatial strategy consulted on in 2021, were subject to appraisal in the Initial ISA Report 2022. The two options are summarised below:

- **Option 1**: Distribute growth proportionately across the County's most sustainable settlements.
- **Option 2**: Focus growth in the County's most sustainable settlements of Abergavenny, Chepstow, and Caldicot, including Severnside, supported by lower growth in the most sustainable rural settlements (excluding those settlements in the Upper Wye catchment area).

5.9 Strategic growth areas (2022)

5.9.1 In 2020, the Council identified potential strategic growth areas for each of the Primary Settlements and Severnside. To inform these possible strategic growth areas a preliminary high-level assessment of sites submitted during the Initial Call for Candidate Sites was undertaken by the Council to identify those sites which could contribute to delivering the level of growth (housing and jobs) required to deliver the Preferred Strategy. Only strategic sites and

sustainable urban extensions of around 8ha in size and above were considered.

5.9.2 The identified strategic growth areas were considered by the Council to have the potential to underpin the Spatial Strategy, by accommodating growth and focusing development within those settlements and areas which are identified as the most sustainable locations.

5.9.3 The potential strategic growth options were assessed through the Initial ISA Report 2021 and reproduced in the Initial ISA Report 2022. The strategic growth options were located in Abergavenny and Llanfoist, Chepstow, Monmouth, and Severnside.

5.10 Feedback from consultation and location of growth options in 2024

5.10.1 Since 2022, DCWW have identified strategic improvements at the Monmouth Wastewater Treatment Works that can be implemented by 31st March 2025 which has provided WG with sufficient certainty to allow for new growth allocations in the Upper Wye Catchment, including at Monmouth. On this basis, there is no need to continue to assess or develop options that avoid growth in settlements in the Upper Wye Catchment area. The four options developed for ISA in 2021 are therefore considered to be representative of the choices available to the Council at this stage, supported by an assessment of the strategic growth locations which remain the same as reported on in 2021 and 2022.

5.10.2 All site options identified through the candidate sites process (by MCC), following the Council's high-level initial sift of sites, have been subject to a GIS analysis. This process has assessed sites against a range of ISA criteria under each of the ISA themes. The method for the assessment and the assessment outcomes are both reported in a separate ISA Technical Annex, and the findings of the assessment, whilst high-level, have informed the assessment of options and allocations in the ISA of the Deposit Plan.

5.11 Summary of options (2024)

5.11.1 In summary, the discussion in this chapter has identified no new options for assessment at this stage, and previously assessed options are reproduced as the representative choices for the Council in terms of their preferred approach and reasonable alternatives. The choices that are taken forward for assessment in Chapter 6 are:

Level of growth

- **Option 1**: Existing Preferred Strategy growth level of 7,605 new dwellings over the entire plan period alongside the creation of 7,215 new jobs.
- **Option 2**: Demographic led strategy growth level of 5,400 new dwellings over the entire plan period alongside the creation of 6,240 new jobs.
- **Option 3**: WG prescribed growth level of 4,280 new dwellings over the entire plan period alongside the creation of 4,290 new jobs.

Location of growth

- **Option 1**: Continuation of the existing LDP Strategy – distributing growth around the County with a particular focus on Main Towns, with some development in Severnside and some development in the most sustainable rural areas.
- **Option 2**: Proportionately distributed growth – growth would be distributed across the County's most sustainable settlements with the level of growth proportionate to that settlement's size and existing amenities, as well as the identified affordable housing need and capacity for growth.
- **Option 3**: Growth focused on the M4 corridor – focusing growth in the south of the County in the Severnside area close to the M4/ M48, to capitalise on its strategic links to the Cardiff Capital Region and South West England.
- **Option 4**: Growth focused in the north of the County – focusing growth in most sustainable settlements in the north of the County to capitalise on its strategic links to the Heads of the Valleys and wider Cardiff Capital Region via the A465, and towards Herefordshire via the A449 and A40.

Strategic growth locations

- **Abergavenny and Llanfoist**:
  - Option A: Land north of Abergavenny.
  - Option B: Land to the east of the A465; and
  - Option C: Land between the B4246 and Heads of the Valleys Road.
- **Chepstow**:
  - Option D: Land north of the Bayfield Estate.
  - Option E: Land between the Bayfield Estate and A48; and
  - Option F: Land between the A48 and M48.
- **Monmouth**:
  - Option G: Land west of Monmouth.
  - Option H: Land in central Monmouth; and
  - Option I: Land north-east of Monmouth.
- **Severnside**:
  - Option J: Land north-east of Caldicot.
  - Option K: Land north-west of Caldicot.
  - Option L: Land west of Caldicot/ east of Rogiet; and
  - Option M: Land east of Caerwent.

6. Assessing Reasonable Alternatives

6.1 Introduction

6.1.1 This chapter presents the summary findings of the assessment of reasonable alternatives set out in Chapter 5. Sets of options have been considered for the following:

- Level of growth.
- Location of growth; and
- Strategic growth area options.

6.1.2 Detailed assessment findings are provided in the following appendices:

- Appendix B: Level of growth options.
- Appendix C: Location of growth options; and
- Appendix D: Strategic growth area options.

6.2 Methodology

6.2.1 The strategic options identified in Chapter 5 were subject to a comparative appraisal under each ISA theme and the detailed findings are presented in Appendices B - D.

6.2.2 For each of the strategic options, the assessment has examined likely significant effects on the baseline, drawing on the sustainability objectives and themes identified through scoping (see Table 3.1) as a methodological framework.

6.2.3 Every effort is made to predict effects accurately; however, this is inherently challenging given the high-level nature of the options under consideration. The ability to predict effects accurately is also limited by understanding of the baseline (now and in the future under a 'no plan' scenario). Considering this, there is a need to make considerable assumptions regarding how scenarios will be implemented 'on the ground' and what the effect on receptors would be. Where there is a need to rely on assumptions to reach a conclusion on a 'significant effect' this is made explicit in the appraisal text.

6.2.4 It is important to note that effects are predicted considering the criteria presented within Regulations. So, for example, account is taken of the duration, frequency, and reversibility of effects. Cumulative effects are also considered (i.e., where the effects of the plan in combination with the effects of other planned or on-going activity that is outside the control of Monmouthshire County Council).

6.2.5 Based on the evidence available a judgement is made if there is likely to be a significant effect. Where it is not possible to predict likely significant effects based on reasonable assumptions, efforts are made to comment on the relative merits of the alternatives in more general terms and to indicate a rank of preference. The number indicates the rank and does not have any bearing on likely significant effects. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to

distinguish between them in terms of 'significant effects'. For example, if an option is ranked as 1 then it is judged to perform better against that ISA theme compared to an option that is ranked 2 or 3 or so on.

6.3 Summary assessment findings for level of growth options

6.3.1 The three options for the level of growth are:

- **Option 1**: Existing Preferred Strategy growth level of 7,605 new dwellings over the entire plan period alongside the creation of 7,215 new jobs.
- **Option 2**: Demographic led strategy growth level of 5,400 new dwellings over the entire plan period alongside the creation of 6,240 new jobs.
- **Option 3**: WG prescribed growth level of 4,280 new dwellings over the entire plan period alongside the creation of 4,290 new jobs.

6.3.2 A summary of the assessment of these options is provided below with the detailed assessment findings presented in Appendix B.

Table 6.1: Summary findings for level of growth options

ISA theme	Rank/ significant effects	Option 1	Option 2	Option 3
Economy and employment	Rank	1	2	3
	Significant effect?	Yes - positive	Yes - positive	No
Population and communities	Rank	1	2	3
	Significant effect?	Yes - positive	Yes - positive	No
Health and wellbeing	Rank	1	2	3
	Significant effect?	Yes - positive	Yes - positive	No
Equalities, diversity, and social inclusion	Rank	1	2	3
	Significant effect?	Yes - positive	Yes - positive	No
Transport and movement	Rank	1	2	3
	Significant effect?	No	No	No
Natural resources (air, land, minerals, and water)	Rank	3	2	1
	Significant effect?	Uncertain	Uncertain	Uncertain
Biodiversity and geodiversity	Rank	3	2	1
	Significant effect?	Uncertain	Uncertain	Uncertain
Historic environment	Rank	3	2	1
	Significant effect?	Uncertain	Uncertain	Uncertain

ISA theme	Rank/ significant effects	Option 1	Option 2	Option 3
Landscape	Rank	3	2	1
	Significant effect?	Uncertain	Uncertain	Uncertain
Climate change (including flood risk)	Rank	1	2	3
	Significant effect?	No	No	No

6.3.3 For ISA themes relating to natural resources, biodiversity, the landscape, and historic environment; the nature and significance of effects will be dependent on where growth is located and how development is designed/ implemented. As the level of growth increases so does the likelihood that impacts will occur, and negative effects will arise. Residual effects in this respect are uncertain and will be better informed by consideration of the location of growth, the sensitivity of receptors in these areas, and the potential mitigation measures available. The lowest growth option (Option 3) is ultimately ranked most favourably in respect of the potential environmental impacts, though it is also recognised that higher levels of development proposed through Option 1, followed by Option 2, have further potential to deliver environmental enhancements/ improvements that could lead to positive effects.

6.3.4 At this stage there is no evidence to conclude that the higher levels of growth would result in a significant negative effect on biodiversity/ geodiversity, the landscape and historic environment (in the absence of known development locations). However, given the limited brownfield resource in the County, development is likely to be primarily delivered through settlement expansion on greenfield land, with residual negative effects likely. The significance of the effects is likely to increase as the level of growth increases. There is uncertainty in terms of impact on important mineral resources and agricultural land until the location of growth is more defined.

6.3.5 Similarly, for the transport ISA theme, Options 1 and 2 proposing a higher level of growth are more likely to result in impacts on the local road network through increased traffic and congestion; however, no evidence suggests impacts are likely to be of significance. Recent increases in homeworking because of the pandemic is considered likely to prevail as a longer-term trend which will continue to support reduced congestion. Further, higher growth presents an increased potential to deliver accessibility and infrastructure improvements and result in more self-contained communities. This could lead to reduced levels of out commuting and modal shift, the importance of which have all been highlighted during the pandemic. As a result, higher growth Option 1, followed by Option 2, are ranked more favourably than Option 3 overall.

6.3.6 Option 3 is noted for potential negative effects in relation to the ISA themes of economy and employment, population and communities, health and wellbeing, and equalities, diversity, and social inclusion. However, there is a level of uncertainty, with effects unlikely to be significant in most cases. Particular concern relates predominantly to limited growth restricting opportunities to address a likely resultant demographic imbalance, which in turn would not support sustainable economic growth. Under this option, limited opportunities for the younger population to live and work in the County would negatively impact communities, exacerbating inequality and rural isolation. This is particularly relevant to certain groups with protected characteristics, such as the young, elderly, and disabled, who tend to be disproportionately affected by accessibility issues and the negative effects of transport infrastructure. Further, under Option 3 there would be a limited opportunity to secure additional market or affordable housing, limiting the range and choice of homes (housing mix) which could drive up house prices and exacerbate affordability issues.

6.3.7 High growth Option 1 is identified as best performing against ISA themes relating to the economy and employment, population and communities, health/ wellbeing and equalities as the additional growth provides an opportunity to deliver a greater range of new housing, employment opportunities and community infrastructure to meet the needs of the County. Option 2 performs slightly less positively than Option 1 given the level of growth proposed is less, however similar positive effects are predicted under this Option, providing a more balanced demographic and more sustainable communities than predicted under Option 3.

6.4 Summary assessment findings for location of growth options

6.4.1 The four options for the location of growth are:

- **Option 1**: Continuation of the existing LDP Strategy – distributing growth around the County with a particular focus on Main Towns, with some development in Severnside and some development in the most sustainable rural areas.
- **Option 2**: Proportionately distributed growth – growth would be distributed across the County's most sustainable settlements with the level of growth proportionate to that settlement's size and existing amenities, as well as the identified affordable housing need and capacity for growth.
- **Option 3**: Growth focused on the M4 corridor – focusing growth in the south of the County in the Severnside area close to the M4/ M48, to capitalise on its strategic links to the Cardiff Capital Region and South West England.
- **Option 4**: Growth focused in the north of the County – focusing growth in most sustainable settlements in the north of the County to capitalise on its strategic links to the Heads of the Valleys and wider Cardiff Capital Region via the A465, and towards Herefordshire via the A449 and A40.

6.4.2 A summary of the assessment of these options is provided below with the detailed assessment findings presented in Appendix C.

Table 6.2: Summary findings for location of growth options

ISA theme	Rank/ significant effects	Option 1	Option 2	Option 3	Option 4
Economy and employment	Rank	1	1	2	2
	Significant effect?	Yes - Positive	Yes - Positive	Uncertain	Uncertain
Population and communities	Rank	1	1	2	2
	Significant effect?	Yes - Positive	Yes - Positive	Uncertain	Uncertain
Health and wellbeing	Rank	1	1	3	2
	Significant effect?	Yes - Positive	Yes - Positive	Uncertain	Uncertain
Equalities, diversity, and social inclusion	Rank	1	1	2	2
	Significant effect?	Yes - Positive	Yes - Positive	Uncertain	Uncertain
Transport and movement	Rank	1	1	2	3
	Significant effect?	Uncertain	Uncertain	Uncertain	Uncertain
Natural resources (air, land, minerals, and water)	Rank	1	1	3	2

ISA theme	Rank/ significant effects	Option 1	Option 2	Option 3	Option 4
	Significant effect?	Yes - Negative	Yes - Negative	Yes - Negative	Yes - Negative
Biodiversity and geodiversity	Rank	3	3	1	2
	Significant effect?	Yes – Negative	Yes - Negative	Uncertain	Yes - Negative
Historic environment	Rank	=	=	=	=
	Significant effect?	Uncertain	Uncertain	Uncertain	Uncertain
Landscape	Rank	2	2	1	2
	Significant effect?	Uncertain	Uncertain	Uncertain	Uncertain
Climate change (including flood risk)	Rank	2	2	1	2
	Significant effect?	Uncertain	Uncertain	Uncertain	Uncertain

6.4.3 The appraisal found that there is little to differentiate between the options at this stage regarding the historic environment ISA theme. This is given that all options have the potential to result in negative effects by directing development to areas that are sensitive in terms of heritage constraints, albeit in different areas of the County. However, it is recognised that mitigation could be provided, and that development also has the potential to deliver positive effects environmental improvement/ enhancement measures secured at the project scale. The nature and significance of effects will be dependent on the precise scale and location of development.

6.4.4 Similar conclusions can also be drawn in relation to biodiversity given the presence of international, national, and local designations throughout the County, though options can be differentiated between in relation to nutrient neutrality implications on the River Wye and River Usk SACs. Whilst solutions are available the options are ranked according to the mitigation requirements. Options 1 and 2, which direct growth to these Primary Settlements (followed by Option 4), therefore are worst performing overall.

6.4.5 In terms of the landscape and climate change themes, Option 3 directs development to areas of lower flood risk and that are less sensitive in landscape terms and is therefore considered to perform better compared to the other options. All other options focus development in areas that are of high flood risk (though it is anticipated that high flood risk areas would be avoided in line with national policy and sequential testing) and near landscape designations with a higher likelihood of negative effect arising. Given that the precise location of growth is not known, and further evidence base work is being carried out around landscape sensitivity, all of the options are found to have uncertain effects in relation to the landscape and climate change themes.

6.4.6 In terms of natural resources, it is difficult to identify any significant differences between the options in relation to water resources and quality. Options 1, 2 and 4, are best performing in terms of utilising brownfield land and protecting Best and Most Versatile (BMV) agricultural land and ensuring that air quality is not reduced throughout the County. However, it is recognised that there are limited opportunities for the regeneration of brownfield land so ultimately most growth will be on greenfield and potentially agricultural land. Option 3 performs less well given it may also lead to the loss of significant greenfield/ BMV land and has the potential to adversely impact upon the Limestone Mineral Safeguarding Area present to the south of the County. All the Options have the potential for a significant negative effect against the natural resources theme through the potential loss of BMV agricultural land, although it is acknowledged that there is an element of uncertainty at this stage until the precise location of development is known.

6.4.7 Options 1 and 2 perform more positively and are found to have the potential for significant long term positive effects against ISA themes relating to population/ communities, health/ wellbeing, economy/ employment, and equalities compared to the other options. They focus growth at the most sustainable Settlements where there is greater need and better access to public transport, existing employment, and facilities/ services. The importance of high levels of local accessibility to open space, services and

facilities have been highlighted through the current pandemic. It should be noted that there are some small differences between Options 1 and 2 in terms of how growth is distributed during the Plan period, but these differences are not significant enough to warrant one option being ranked higher or lower than the other against the ISA themes referred to earlier in this paragraph.

6.4.8 Option 3 capitalises upon opportunities associated with the Cardiff Capital Region City Deal, the South East Wales Metro, and the continuing economic growth of the Bristol/ South West region. Whereas Option 4 focuses growth to the most sustainable Settlements to the North of the County capitalising upon opportunities associated with the Cardiff Capital Region City Deal, the A465, and towards Herefordshire via the A449 and A40 along with rail links to Newport, Cardiff and the North via the Welsh Marches line. However, limited growth to the rest of the County under Option 3 and Option 4 would restrict economic growth in the wider County, and would not assist in sustaining Monmouthshire's existing communities, exacerbating existing demographic issues and levels of out-commuting.

6.4.9 Consideration is also given throughout the appraisal to Future Wales National Plan 2040 (National Development Framework (NDF) 2021) which indicates a desire to designate a Green Belt *"around Newport and eastern parts of the region".* This is anticipated to include a large part of South Monmouthshire which, although it does not include any of Monmouthshire's main towns, if implemented would significantly constrain future growth in this part of the County. Option 4 would accord with the direction of the Future Wales document, and therefore performs positively in terms of facilitating growth consistent with emerging National policy. PPW notes that longer term needs should be considered when considering the boundaries of a Green Belt. Conversely Option 3 would direct growth to the south where the Green Belt is proposed through the Future Wales document. As all other options seek to disperse growth throughout the County, and a defined location has not yet been established for the Green Belt, it is difficult to make any definitive conclusions on the nature and significance of effects at this stage.

6.5 Summary appraisal findings for strategic growth area options

6.5.1 Strategic growth options have been identified across the four settlement areas of Abergavenny and Llanfoist, Chepstow, Monmouth, and Severnside. A summary of the assessment of these options is provided below with the detailed assessment findings presented in Appendix D.

6.5.2 **Abergavenny and Llanfoist**:

- Option A: Land north of Abergavenny.
- Option B: Land to the east of the A465; and
- Option C: Land between the B4246 and Heads of the Valleys Road.

Figure 6-1: Strategic growth options in Abergavenny and Llanfoist

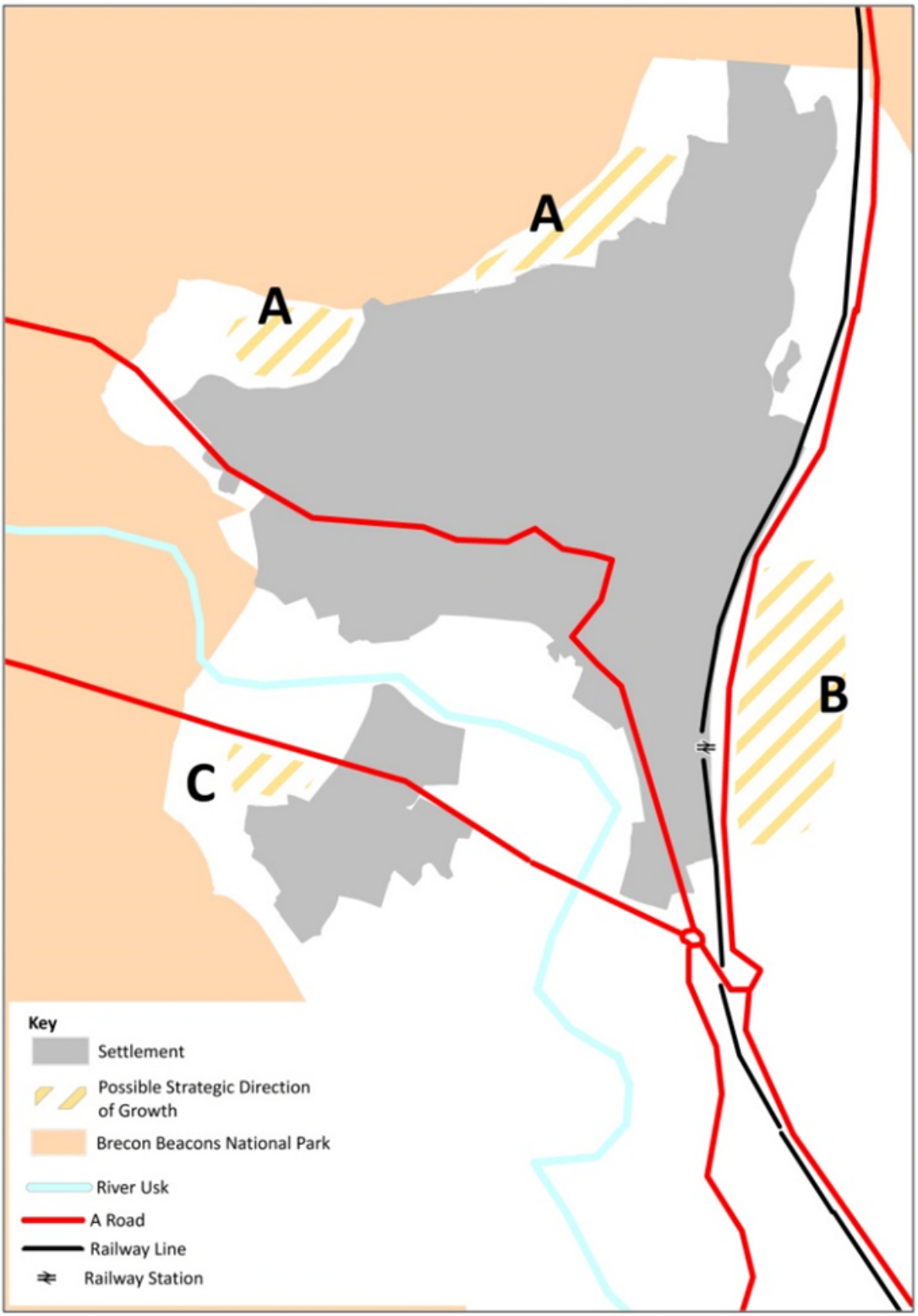


Table 6.3: Summary findings for Abergavenny and Llanfoist strategic growth options

ISA theme	Rank/ Significant effects	Option A	Option B	Option C
Economy and employment	Rank	1	2	3
	Significant effect?	No	No	No
Population and communities	Rank	1	2	3
	Significant effect?	Yes - Positive	Yes - Positive	Yes - Positive
Health and wellbeing	Rank	1	2	2
	Significant effect?	No	No	No
Equalities, diversity, and social inclusion	Rank	2	3	1
	Significant effect?	No	No	No
Transport and movement	Rank	=	=	=
	Significant effect?	No	No	No
Natural resources	Rank	1	2	3
	Significant effect?	Yes - Negative	Yes - Negative	Yes - Negative
Biodiversity and geodiversity	Rank	1	1	2
	Significant effect?	Yes - Negative	Yes - Negative	Yes - Negative
Historic environment	Rank	2	1	3
	Significant effect?	Uncertain	Uncertain	Uncertain
Landscape	Rank	3	1	2
	Significant effect?	Yes - Negative	Yes - Negative	Uncertain

ISA theme	Rank/ Significant effects	Option A	Option B	Option C
Climate change (including flood risk)	**Rank**	**2**	**1**	**3**
	Significant effect?	**Uncertain**	**Uncertain**	**Uncertain**

6.5.3 No significant differences have been identified between Options for the Transport and Movement ISA theme.

6.5.4 All Options perform positively against the Population and Communities, Health and Wellbeing, Equalities, Diversity and Social Inclusion, and Transport and Movement ISA themes, given Options are connected with reasonable distance to Abergavenny town centre, its services and facilities, and sustainable travel. Option A performs most positively of the Options for the majority of ISA Themes discussed above given this Option is most well located in this respect; with Options B and C dissected from the town centre by the A465. However, Option C performs most positively against the Equalities, diversity, and social inclusion ISA theme as this Option best supports deprived communities to the west of the town.

6.5.5 All Options perform negatively against the Natural Resources ISA theme given all Options would result in the loss of greenfield and BMV agricultural land and would not contribute towards promoting the use of brownfield land. However, it is recognised that there are limited opportunities within the County for brownfield development and development on lower grades of agricultural land. Option A is best performing against this ISA theme as it has the greatest access to the town centre.

6.5.6 In terms of the Biodiversity ISA theme, Options are constrained in terms of internationally/ nationally/ designated assets/sites, with the potential for significant long term negative effects. Whilst solutions are now available, the mitigation requirements need implementing and the potential for negative effects in their absence are noted at this stage. Supporting policy requirements will reduce the extent of these effects. In terms of ranking the Options, Option C is the worst performing theme as it is within 200m of the River Usk SAC/ SSSI, however given the additional impact pathways identified through the HRA for the SAC (recreation and water quantity, level, and flow), it is considered that Options A and B also have the potential to impact upon this European designated site.

6.5.7 Options are also constrained in terms of internationally/ nationally/ designated assets/sites under the Landscape and Historic Environment ISA themes. As with biodiversity, Option C is worst performing against the Historic Environment ISA theme given its proximity to the Blaenavon Industrial WHS and potential to affect internationally and nationally designated heritage landscapes. Option A also has the potential to lead to negative effects in this respect. In terms of Landscape, Option A is worst performing due to the potential impact on the Brecon Beacons National Park, its open character and hillside setting. Option A is also worst performing

given its ‘high/medium’ sensitivity to residential development, as set out in the Monmouthshire Landscape Sensitivity Update Study (2020). Option B is also identified as having ‘high/medium’ sensitivity to residential development.

6.5.8 The overall significance of effects against the Biodiversity, Landscape and Historic Environment ISA themes is uncertain at this stage and will be dependent on the design/ layout and implementation of specific mitigation measures. Specifically, in relation to the issue of nutrient neutrality in the River Usk SAC, all residential development coming forward in the hydrological catchment of these riverine SACs will have to be phosphorus neutral and supported by nutrient budgets. It is also noted that there is the potential for positive effects to be delivered, i.e., through improved accessibility to, and enhancement of, designated assets.

6.5.9 Option C is worst performing of the Options in relation to the Climate Change ISA theme, given that a significant proportion of Option C is located within areas at higher risk of flooding, with the potential for long term negative effects. However as above, for all Options, effects against Climate Change are uncertain at this stage. Uncertainty could be reduced by supporting policy mitigation.

6.5.10 **Chepstow**:

- Option D: Land north of the Bayfield Estate.
- Option E: Land between the Bayfield Estate and A48; and
- Option F: Land between the A48 and M48.

Figure 6-2: Strategic growth options in Chepstow

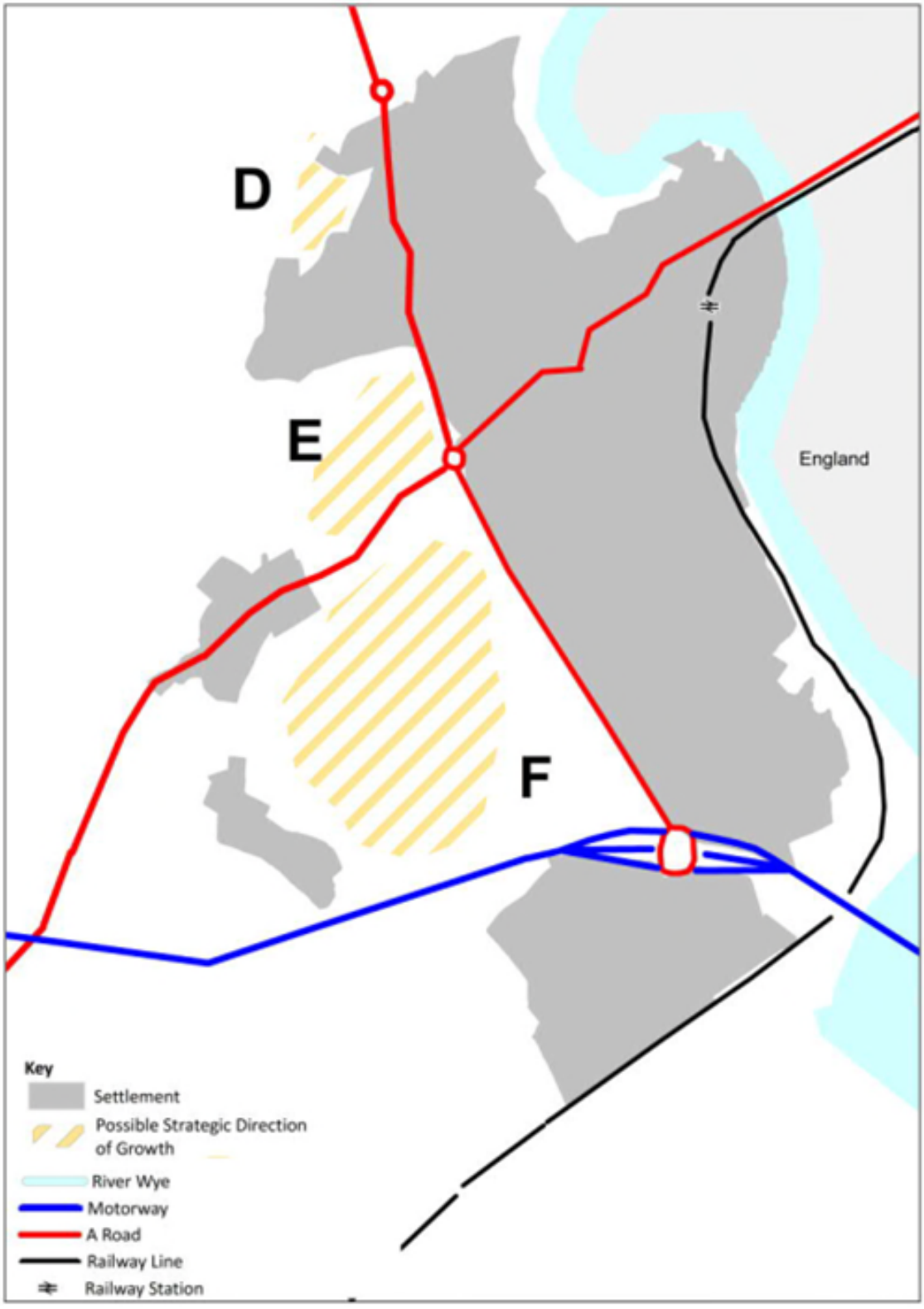


Table 6.4: Summary findings for Chepstow strategic growth options

ISA theme	Rank/ Significant effects	Option D	Option E	Option F
Economy and employment	Rank	3	2	1
	Significant effect?	No	No	No
Population and communities	Rank	=	=	=
	Significant effect?	Yes - Positive	Yes - Positive	Yes - Positive
Health and wellbeing	Rank	=	=	=
	Significant effect?	No	No	No
Equalities, diversity, and social inclusion	Rank	2	1	3
	Significant effect?	No	No	No
Transport and movement	Rank	=	=	=
	Significant effect?	No	No	No
Natural resources	Rank	=	=	=
	Significant effect?	Yes - Negative	Yes - Negative	Yes - Negative
Biodiversity and geodiversity	Rank	1	2	3
	Significant effect?	Uncertain	Uncertain	Uncertain
Historic environment	Rank	1	1	2
	Significant effect?	Uncertain	Uncertain	Yes - Negative
Landscape	Rank	2	1	3
	Significant effect?	Uncertain	Yes - Negative	Yes - Negative

ISA theme	Rank/ Significant effects	Option D	Option E	Option F
Climate change (including flood risk)	**Rank**	**=**	**=**	**=**
	Significant effect?	**Uncertain**	**Uncertain**	**Uncertain**

6.5.11 No significant differences have been identified between Options for the Population and Communities, Transport and Movement, Health and Wellbeing, Natural Resources, and Climate Change ISA themes.

6.5.12 All Options perform positively against the Economy and Employment ISA theme, Population and Communities, Health and Wellbeing, Equalities, Diversity and Social Inclusion and Transport and Movement ISA theme. In terms of Economy and Employment, Option F performs most positively given it is well connected with the M4 corridor, the Severn Bridge, and employment opportunities to the south of the town. In terms of Equalities, Diversity and Social Inclusion, Option E is best performing as it provides improved access for vulnerable groups to the town centre; supporting improved levels of deprivation.

6.5.13 All Options perform negatively against the Natural Resources ISA theme given all Options would result in increased vehicular use within Chepstow AQMA, and the permeant loss of BMV agricultural land /greenfield land. However, it is recognised that there are limited opportunities within the County for brownfield development and development on lower grades of agricultural land.

6.5.14 In terms of the Biodiversity, Landscape, and Historic Environment ISA themes; all Options are constrained in terms of internationally/ nationally/ designated assets/ sites, with the potential for significant long term negative effects. In terms of biodiversity, given the impact pathways identified through the HRA (2019), all Options perform equally in terms of impact on the Wye Valley Woodland SAC/ SSSI/ National Nature Reserve and the River Wye SAC/ SSSI. Option F is the worst performing against the Biodiversity ISA theme as there are areas of Ancient Woodland (and other habitats and associated species) present within the Option, impacts upon which have the potential for long term negative effects.

6.5.15 Option F is the most sensitive in terms of the historic environment as the growth area falls within a conservation area and contains 16 listed buildings. It is not possible to identify any significant differences between Options D and E at this stage in terms of the Historic Environment ISA theme; however, they are considered to be less likely to result in residual significant effects compared to Option F.

6.5.16 All of the options have the potential for a significant negative effect on the Landscape ISA them. Assuming that the same scale/ type of development would be delivered within the strategic growth areas, the differences identified between them at this stage mainly reflect the Landscape Sensitivity

Update Study (2020) and findings. Option F is worst performing, given its 'high' sensitivity to residential development; followed by Option D given it is identified as having medium landscape sensitivity and located adjacent to the AONB.

6.5.17 For all Options, effects against Climate Change are uncertain at this stage. Uncertainty could be reduced by supporting policy mitigation.

6.5.18 **Monmouth**:

- Option G: Land west of Monmouth.
- Option H: Land in central Monmouth; and
- Option I: Land north-east of Monmouth.

Figure 6-3: Strategic growth options in Monmouth

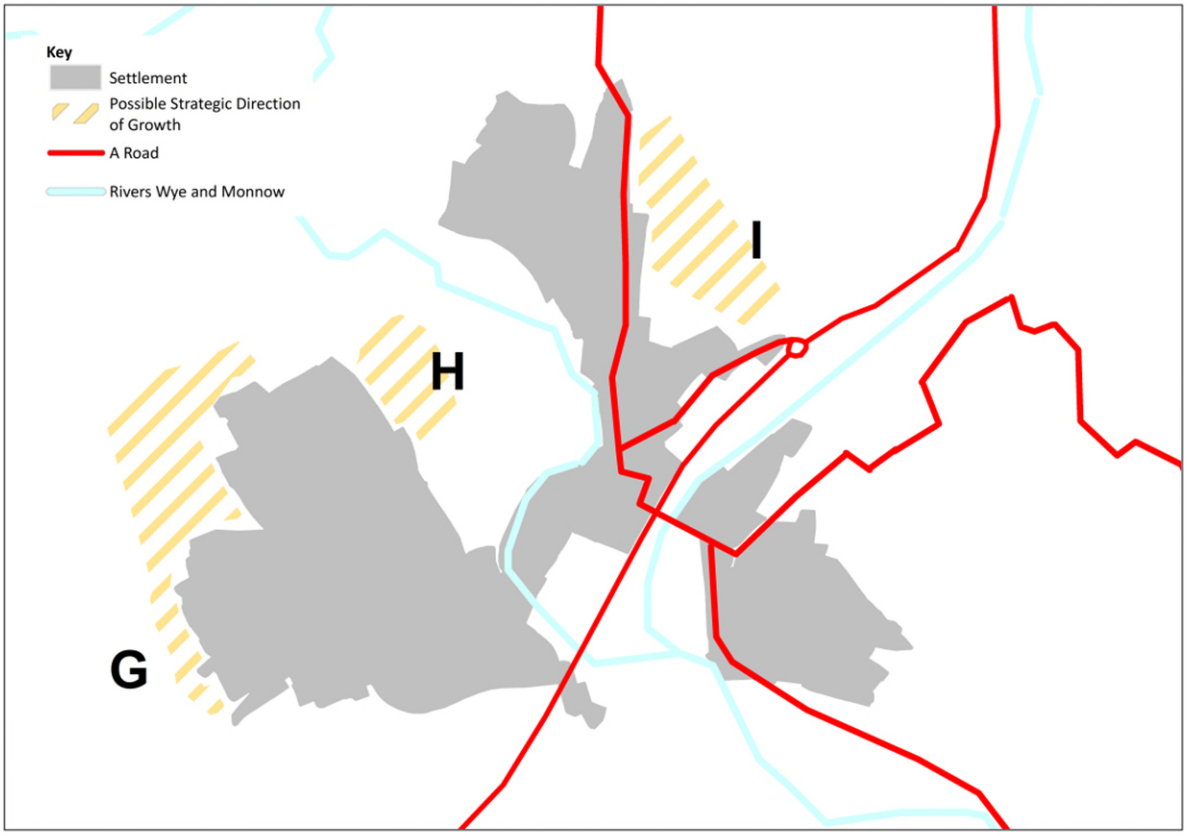


Table 6.5: Summary findings for Monmouth strategic growth options

ISA theme	Rank/ Significant effects	Option G	Option H	Option I
Economy and employment	**Rank**	**2**	**1**	**3**
	Significant effect?	**No**	**No**	**No**
Population and communities	**Rank**	**2**	**1**	**1**
	Significant effect?	**Yes - Positive**	**Yes - Positive**	**Yes - Positive**
Health and wellbeing	**Rank**	**1**	**1**	**1**
	Significant effect?	**No**	**No**	**No**

ISA theme	Rank/ Significant effects	Option G	Option H	Option I
Equalities, diversity, and social inclusion	Rank	=	=	=
	Significant effect?	No	No	No
Transport and movement	Rank	=	=	=
	Significant effect?	No	No	No
Natural resources	Rank	1	2	3
	Significant effect?	Yes - Negative	Yes - Negative	Yes - Negative
Biodiversity and geodiversity	Rank	1	1	2
	Significant effect?	Yes - Negative	Yes - Negative	Yes - Negative
Historic environment	Rank	1	2	3
	Significant effect?	Uncertain	Uncertain	Uncertain
Landscape	Rank	1	2	2
	Significant effect?	Uncertain	Yes - Negative	Yes - Negative
Climate change (including flood risk)	Rank	=	=	=
	Significant effect?	Uncertain	Uncertain	Uncertain

6.5.19 No significant differences have been identified between Options for the Equalities, Diversity and Social Inclusion, Transport and Movement, and Climate Change ISA themes.

6.5.20 All Options perform positively against the Economy and Employment ISA theme, Population and Communities, Health and Wellbeing, Equalities, Diversity and Social Inclusion, and Transport and Movement ISA themes, given Options are connected with reasonable distance to Monmouth town centre, its services and facilities, and sustainable travel. Option H performs most positively of the Options for Economy and Employment, Population and Communities, and Health and Wellbeing ISA Themes given this Option is

most well located in this respect. Option G also performs well due to its location adjacent to the Wonastow Estate employment site.

6.5.21 All Options perform negatively against the Natural Resources ISA theme given all Options would result in the loss of greenfield and BMV agricultural land and would not contribute towards promoting the use of brownfield land. However, it is recognised that there are limited opportunities within the County for brownfield development and development on lower grades of agricultural land. Option G is best performing in this respect as it is the least constrained Option in terms of BMV agricultural land coverage. Option I is worst performing given it would result in the loss of higher quality agricultural land in comparison with Option H.

6.5.22 In terms of the Biodiversity ISA themes; all Options are constrained in terms of internationally/ nationally/ designated assets/ sites, with the potential for significant long term negative effects. Whilst solutions are now available to address nutrient neutrality issues, the mitigation requirements need implementing and the potential for negative effects in their absence are noted at this stage. Supporting policy requirements will reduce the extent of these effects. In terms of ranking the Options, given the proximity of Option I to the River Wye SAC/ SSSI and the Wye Valley Woodland SAC/ SSSI/ National Nature Reserve, and the biodiversity present at the Option itself, Option I is worst performing overall.

6.5.23 All Options are also constrained in terms of internationally/ nationally/ designated assets/ sites under the Landscape and Historic Environment ISA themes. As above in relation to biodiversity, Option I is worst performing against the Historic Environment ISA theme as there are numerous heritage assets present in close proximity to the Option (Monmouth (Dixton) Conservation Area to the south east of the Option (which contains two scheduled monuments and five listed buildings), and the listed buildings to the north west of the Option on the other side of the A466).

6.5.24 Options I and J perform equally against the Landscape ISA theme given both are identified as having high/medium sensitivity to residential development, and both are constrained by landscape designations (Option I is located adjacent to a Landscape of Outstanding or Special Historic Interest, while Option H is designated in the current adopted LDP as an ‘Area of amenity importance).

6.5.25 The overall significance of effects against the Biodiversity, Landscape and Historic Environment ISA themes is uncertain at this stage and will be dependent on the design/ layout and implementation of specific mitigation measures. Specifically, in relation to the emerging issue of nutrient neutrality in the River Wye SAC, Natural Resources Wales and Natural England advise that all residential development coming forward in the hydrological catchment of these riverine SACs will have to be phosphorus neutral and supported by nutrient budgets. It is also noted that there is the potential for positive effects to be delivered, i.e., through improved accessibility to, and enhancement of, designated assets.

6.5.26 For all Options, effects against Climate Change are uncertain at this stage. Uncertainty could be reduced by supporting policy mitigation.

6.5.27 **Severnside**:

- Option J: Land north-east of Caldicot.
- Option K: Land north-west of Caldicot.
- Option L: Land west of Caldicot/ east of Rogiet; and
- Option M: Land east of Caerwent.

Figure 6-4: Strategic growth options in Severnside

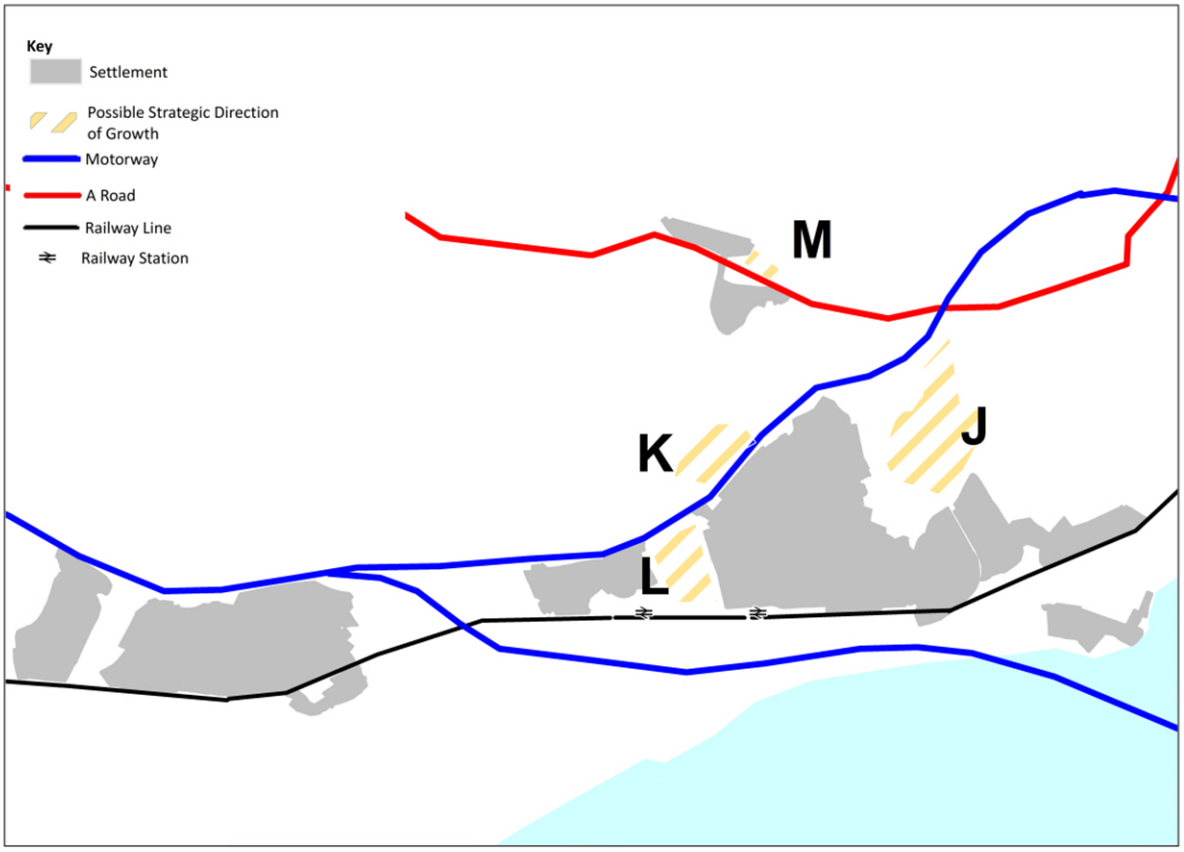


Table 6.6: Summary findings for Severnside strategic growth options

ISA theme	Rank/ Significant effects	Option J	Option K	Option L	Option M
Economy and employment	**Rank**	**2**	**2**	**1**	**3**
	Significant effect?	**No**	**No**	**No**	**No**
Population and communities	**Rank**	**1**	**2**	**1**	**3**
	Significant effect?	**Yes - Positive**	**Yes - Positive**	**Yes - Positive**	**Yes - Positive**
Health and wellbeing	**Rank**	**2**	**2**	**1**	**3**

ISA theme	Rank/ Significant effects	Option J	Option K	Option L	Option M
	Significant effect?	No	No	No	No
Equalities, diversity, and social inclusion	Rank	2	3	1	4
	Significant effect?	No	No	No	No
Transport and movement	Rank	2	2	1	3
	Significant effect?	No	No	No	No
Natural resources	Rank	2	2	1	2
	Significant effect?	Yes - Negative	Yes - Negative	Yes - Negative	Yes - Negative
Biodiversity and geodiversity	Rank	3	2	3	1
	Significant effect?	Uncertain	Uncertain	Uncertain	Uncertain
Historic environment	Rank	3	2	1	2
	Significant effect?	Uncertain	Uncertain	No	Uncertain
Landscape	Rank	3	3	2	1
	Significant effect?	Yes - Negative	Yes - Negative	Uncertain	Uncertain
Climate change (including flood risk)	Rank	1	1	3	2
	Significant effect?	Uncertain	Uncertain	Uncertain	Uncertain

6.5.28 All Options perform positively against the Population and Communities, Health and Wellbeing, Equalities, Diversity and Social Inclusion, and Transport and Movement ISA themes, given Options have good to reasonable access to services and facilities throughout the Severnside area (notably Caldicot town centre), and access to the strategic transport network.

Options have the potential to capitalise upon sustainable travel opportunities in the key Severnside settlements (namely Caldicot and the Severn Tunnel Junction rail station in Rogiet), in addition to utilising the M4 corridor. This will provide access to wider employment markets, including opportunities associated with the Cardiff Capital Region City Deal and the South East Wales Metro. While positive effects are anticipated through all Options, Option M performs least well of the Options given its comparatively poor access to Severnside centres, services and facilities, and relatively limited potential to capitalise upon the strategic road network.

6.5.29 In terms of differentiating between Options J-L for the above ISA themes, Option L is best performing given its location along the M4 corridor, nestled between Caldicot and Rogiet, and its ability to capitalise upon sustainable transport infrastructure and encourage modal shift. Option J and K perform relatively on a par, given reasonable access to services, facilities, and the strategic road network/ sustainable transport opportunities.

6.5.30 All Options perform negatively against the Natural Resources ISA theme given all Options would result in the loss of greenfield and BMV agricultural land and would not contribute towards promoting the use of brownfield land. However, it is recognised that there are limited opportunities within the County for brownfield development and development on lower grades of agricultural land. Option L is best performing against this ISA theme as it is well located in terms of potential to utilise sustainable travel and improve air quality; is the least constrained in terms of Grade 1 agricultural land coverage.

6.5.31 In terms of the Biodiversity, Landscape, and Historic Environment ISA themes; Options are constrained in terms of internationally/ nationally/ designated assets/ sites, with the potential for significant long term negative effects. Options J and L are worst performing against the Biodiversity ISA theme given the presence of the Severn Estuary SPA/ SAC/ Ramsar site/ SSSI within 900m and 1.2km of the Options, respectively. Option M is identified as best performing, given it is the least constrained of the Options in terms of potential impact on biodiversity designated sites, and overall biodiversity value.

6.5.32 Option J is also worst performing against the Historic Environment ISA theme given it may lead to some development within the Caldicot Conservation Area, which also contains Caldicot Castle Grade I listed building and Scheduled Monument; and would result in the loss of large areas of greenfield/ open space in the setting of the castle which is also a Country Park. Option L is the least sensitive in terms of the historic environment. Options J and K are worst performing in terms of landscape, given both have been identified through the Landscape Sensitivity Update Study (2020) as having ‘medium-high sensitivity for housing development. Option K would extend development northwest of the M48 into the open landscape; while Option J would extend the settlement of Caldicot to the northeast, towards the settlement of Crick and extend development north of the Caldicot Castle Country Park (which is also a conservation area). Option L has medium sensitivity to residential development, and may lead to coalescence between Caldicot and Rogiet, resulting in the loss of a multi-functional open space and designated ‘Green Wedge’. Option M is best

performing in this respect, although there remains the potential for residual minor negative effects.

6.5.33 The potential for Options to lead to significant effects against the Biodiversity, Landscape, and Historic Environment ISA themes is uncertain at this stage and will be dependent on the design/ layout and implementation of specific mitigation measures. It is also noted that there is the potential for positive effects to be delivered, i.e., through biodiversity net-gain, and the enhancement of designated assets.

6.5.34 Option L is worst performing of the Options in relation to the Climate Change ISA theme, given that a significant proportion of Option L is located within Flood Zones B/C, with the potential for long term negative effects. However as above, for all Options, effects against Climate Change are uncertain at this stage. Uncertainty could be reduced by supporting policy mitigation.

7. Developing the Preferred Approach

7.1 Preferred growth and spatial option

7.1.1 The Council have provided the following response to the alternatives assessment.

7.1.2 The options appraisal concluded that Growth Option 2 and Spatial Option 2 combined were the most appropriate options for the 2022 Preferred Strategy and Deposit Plan.

7.1.3 While Growth Option 2 reduces the level of growth proposed compared to the 2021 Preferred Strategy it is considered the best option to respond to challenges, namely the Welsh Government objection to the level of growth set out in the 2021 Preferred Strategy, whilst also ensuring that the RLDP delivers on the Council's objectives and addresses the core issues of delivering much needed affordable housing at pace and scale, responding to the climate and nature emergency by delivering zero carbon ready new homes for our communities, and ensuring our communities are socially and economically sustainable. Similarly, Spatial Option 2 would address our locally evidence-based issues and objectives including in relation to the delivery of affordable homes, rebalancing our demography and responding to the climate and nature emergency, and as such is considered the most appropriate spatial strategy option.

7.1.4 The Preferred Growth Strategy is based on a demographic-led scenario with added policy assumptions[13]. It provides a level of growth (homes and jobs) that maximises the extent to which we address our local evidence-based issues, including in relation to the delivery of affordable homes, sustainable economic growth, rebalancing our demography by ensuring that young people can choose to live in the County while responding to the climate and nature emergency. The ISA analysis identifies that Growth Option 2 performs slightly less positively than Growth Option 1 given the level of growth proposed is less, however similar positive effects are predicted under this option. This growth option performs well against ISA themes relating to the economy and employment, population and communities, health/wellbeing and equalities as the additional growth provides an opportunity to deliver a range of new housing, employment opportunities and community infrastructure to meet the needs of the County providing a more balanced demographic and sustainable communities. While Growth Option 1 is identified as best performing against ISA themes relating to the economy and employment, population and communities, health/wellbeing and equalities it performs least favourably against ISA themes relating to Natural Resources, Biodiversity and Geodiversity, Historic Environment and Landscape. In addition, Welsh Government raised significant concerns in relation to this Growth Option suggesting the level of growth in Monmouthshire would undermine growth in the national growth area of Cardiff, Newport and the Valleys and as a result would not be in general conformity with policies 1 and 33 of Future Wales: the National Plan 2040.

[13] Demographic-led option for the LPA area (i.e. excludes the BBNP area within Monmouthshire) using ONS 2020 MYE base and applying assumptions in relation to migration, household membership rates and commuting ratio, as set out in the Housing Background Paper.

Growth Option 1 has therefore been discounted. Further to this, Growth Option 3 performs negatively to RLDP objectives relating to Economic Growth/Employment, Demography, Housing, Place-making, Communities, Rural Communities, Infrastructure and Accessibility. It is also noted for potential negative effects in relation to the ISA themes of economy and employment, population and communities, health and wellbeing, and equalities, diversity, and social inclusion. Option 3 would not deliver on the Council's core objectives of delivery of affordable housing and rebalancing our demography and has subsequently been rejected. For further details on Growth Options 1 and 3 refer to the Growth and Spatial Strategy Options Appraisal as set out in Appendix 1.

7.1.5 Spatial Option 2 and Spatial Option 1 perform positively against ISA themes, in relation to population/ communities, health/ wellbeing, economy/ employment, and equalities. The Preferred Growth and Spatial Option would best achieve sustainable balanced deliverable outcomes by:

- Delivering a level of growth (homes and jobs) that addresses our locally evidence-based issues and objectives, including in relation to the delivery of affordable homes, rebalancing our demography and responding to the climate and nature emergencies, whilst having regard to WG officer concerns regarding alignment with Future Wales: The National Plan 2040.
- Maximising affordable housing delivery on new housing allocations, reflecting the Council's commitment to deliver 50% affordable homes on new housing sites which would help to tackle Monmouthshire's housing need, homelessness, and social inequality. This approach would also enable the Council to consider alternative mechanisms for delivering affordable homes.
- Providing a wider choice of smaller homes to enable younger people to live and work in Monmouthshire which would make our ageing communities more socially and economically sustainable.
- Requiring new homes to be net zero carbon, reflecting our commitment to responding to and tackling climate change.
- Delivering growth in our most sustainable settlements. This would limit the impacts of climate change and ensure good placemaking principles of attractive, accessible places to live and work that have access to sustainable transport links and reduce the need for journeys by the car.
- Promoting sustainable economic growth by providing policy support to enable and facilitate home/remote working, enabling economic growth through supporting the delivery of the priorities and aims identified in the Council's Economy, Employment and Skills Strategy and climate emergency declaration, maximising opportunities from Cardiff Capital Region City Deal, targeting growth in key economic sectors and providing appropriate employment land in the right locations.

7.1.6 Overall, it is considered that the Deposit Plan, based on the above preferred growth and spatial options, strikes a compromise between achieving our local evidence-based objectives that underpinned the Preferred Strategy consulted upon in July 2021 and the Welsh Government's response which objected to the level of growth proposed. In response, the Deposit Plan proposes a lower level of growth that responds to these challenges.

7.2 Preferred strategic sites

7.2.1 The Preferred Strategic Site Allocations have been selected from a total of 13 Strategic Growth Options located across Abergavenny, Chepstow, Monmouth and Severnside that were previously consulted on in the 2021 and 2022 Preferred Strategy. Site selection has been informed by the assessment of candidate sites and the consultation responses received.

7.2.2 As part of the consultation in July 2021, preferences were cast by members of the public using 'Placecheck'. Although it was made clear at that time that this was not part of the formal consultation, the results provide a helpful indication of public opinion. A total of 3,179 preferences were cast in the process. Table 7.1 below provides further detail. The four Preferred Strategic Site Allocations identified in the Deposit Plan are highlighted.

Table 7.1: Strategic site options

SEA option	Strategic growth area	Up votes	Down votes
Abergavenny A	Land north of Abergavenny	54	184
Abergavenny B	Land to the east of the A465	191	23
Abergavenny C	Land between the B4246	107	47
Chepstow D	Land north of the Bayfield Estate	51	132
Chepstow E	Land between the Bayfield Estate and A48	43	143
Chepstow F*	Land between the A48 and M48	60	143
Monmouth G	Land west of Monmouth	270	175
Monmouth H	Land central Monmouth	255	189
Monmouth I	Land north east Monmouth	318	248
Severnside J	Land north east of Caldicot	74	72
Severnside K	Land north west of Caldicot	48	85
Severnside L	Land west of Caldicot/ east of Rogiet	57	100
Severnside M	Land east of Caerwent	59	51

*Site/ Option F is no longer being put forward for development by the site promoter

7.2.3 The reasons for selection of sites are set out below:

Land to the East of Abergavenny (Option B)

7.2.4 The preferred strategic site allocation is a sustainably located edge of settlement site. Development here would expand the built-up area of the town beyond the A465 which currently forms a hard development boundary to the town. The site has the potential to form a well-connected urban extension to Abergavenny and provides the opportunity to provide a mixed-use development, containing a mix of residential uses alongside employment/commercial uses, facilities and services.

7.2.5 The proximity of the area to Abergavenny Railway Station (currently an approximately 10-minute walk, 0.5 miles) offers significant benefits to maximise opportunities for a modal shift to more sustainable forms of transport and offers an opportunity for transit-oriented development. The site is just an approximate 16-minute walking distance from the town centre

(0.7 miles). Vehicular access would be required from the A465 trunk road. The site has potential to offer park and ride facilities for Abergavenny train station, helping address an existing problem and supporting future modal shift alongside the increased train service frequency proposed as part of the South Wales Metro proposals.

7.2.6 The land is categorised as having high/medium landscape sensitivity to residential development in the Landscape Sensitivity Update. The site is mostly located on an area of predictive grade 2/3a BMV agricultural land. However, when considering the search sequence recommended in PPW12 it is noted that most of the land surrounding Abergavenny is either of BMV status or within floodplain. Moreover, the County's primary settlements are surrounded by either BMV land or flood plain meaning an alternative spatial strategy would not avoid allocating BMV land for development. Development will need demonstrate phosphate neutrality or betterment in its design and/or its contribution to the water body of the River Usk SAC catchment area.

7.2.7 This allocation could helpfully identify the long-term direction of growth for the town. This longer-term potential is advantageous.

Land at Mounton Road, Chepstow (Option E)

7.2.8 The Bayfield Site has not progressed to the Deposit Plan. In October 2023 a report of post consultation Preferred Strategy changes was agreed by Council. This included swopping the strategic site in Chepstow from Bayfield to Land at Mounton Road on the basis that a mixed-use development that includes a care home and proposed hotel had associated job creation and tourism benefits.

7.2.9 The preferred strategic site allocation is a sustainably located edge of settlement site. Development here would expand the existing built-up area west of the A466 (St Lawrence Road), north of the A48 and south of Mounton Road. The site is near the Wye Valley National Landscape (AONB) and on the opposite side of the road to the Mathern Conservation Area. PPW gives National Parks and AONBs equal status in terms of landscape and scenic beauty and requires that both be afforded the highest status of protection from inappropriate developments. Development in this location would need to be carefully designed to ensure that any effects on the setting of the National Landscape are acceptable. The land is categorised as being of high/medium landscape sensitivity to residential development.

7.2.10 The site is approximately 0.9 miles or an approximate 15-minute walking distance from the town centre and Bulwark neighbourhood centre, 0.9 miles (approximately 17-minute walk) from Chepstow Comprehensive School and Leisure Centre, and 1.1 miles (approximately 9-minute walk) from Chepstow railway station. As outlined above, careful consideration will be required regarding the cumulative impact of development on the A466, A48 and Highbeech roundabout.

7.2.11 Circa 72% of the land is predictive grade 2 and 3a BMV agricultural land. However, when considering the search sequence recommended in PPW it is noted that most of the land surrounding Chepstow is either of BMV status or affected by other constraints. Moreover, the County's primary settlements

are surrounded by either BMV land or flood plain meaning an alternative spatial strategy would not avoid allocating BMV land for development. Another consideration will include its location in the limestone minerals safeguarding area.

Leasbrook, Monmouth (Option I)

7.2.12 The preferred strategic site allocation in Monmouth relates to a greenfield site to the north-east of Monmouth. The site is a sustainably located edge of settlement site north of Dixton Road. The site is located adjacent to existing development at Dixton Close and Hereford Road, including Haberdashers' Monmouth School's playing pitches to the west, along with agricultural land to the east and north.

7.2.13 Monmouth sits within the River Wye Special Area of Conservation (SAC) catchment area. The strategic site will therefore need to demonstrate phosphate neutrality or betterment in its design and/or its contribution to the water body. A strategic solution to phosphates at the Monmouth Wastewater Treatment Works has been identified by Dŵr Cymru Welsh Water which should be implemented by 31st March 2025.

7.2.14 The site is near the Dixton Roundabout offering good links to locations further afield when public transport and use of the private car is necessary. There is no rail network to encourage sustainable travel by rail, the need to reduce travel/carbon and support active travel options is of importance.

7.2.15 Regarding agricultural land, the site contains a small amount of Grade 2 land with most of the site Grade 3a with Grade 3b. However, when considering the search sequence recommended in PPW it is noted that most of the land surrounding Monmouth is of BMV status. Moreover, the County's primary settlements are surrounded by either BMV land or flood plain meaning an alternative spatial strategy would not avoid allocating BMV land for development.

7.2.16 As a small part of the main access point of the site is located in floodplain, an emergency access will be included to ensure an alternative route in any extreme flooding events on Dixton Road. The site is located within proximity to two Special Areas of Conservation and adjoins the Dixton Conservation Area with a very small portion of the site being located in the Lower Wye Valley Landscape of Historic Interest.

7.2.17 In terms of distance to Monmouth Town Centre the site is located approximately 0.6 miles/13-minutes from the Town Centre with the whole Town Centre being located within 0.9 miles and an 18-minute walk. The site is in very close proximity to Monmouth Comprehensive School 0.4miles/ 7-minutes and the Leisure Centre 0.6miles/ 12-minutes (using the public entrance/route).

Land to the East of Caldicot (Option J)

7.2.18 The preferred strategic site allocation is a sustainably located edge of settlement site. Development here would extend the settlement of Caldicot to the northeast, towards the settlement of Crick and adjacent to the adopted LDP Crick Road, Portskewett site. The site is north of the Caldicot Castle

Country Park, a Conservation Area and an area currently designated as an Area of Amenity Importance under the Adopted LDP.

7.2.19 A small part of the candidate site adjacent to the former railway line is in the floodplain: built development would not be permitted within this part of the site. Part of the site includes previously developed land comprising a commercial equestrian centre, with much of the remainder being on Council-owned land. The inclusion of such suitable land is supported by Future Wales Policy 3 which supports public leadership and the use of public land to deliver on ambitious affordable housing targets.

7.2.20 In terms of agricultural land, the site contains a small area of grade 1 agricultural land, most of which is within a floodplain so would not be built on. The remaining area is classified predominantly as grade 2 agricultural land. However, when considering the search sequence recommended in PPW it is noted that most of the land surrounding Caldicot is either of BMV status or floodplain. Moreover, the County's primary settlements are surrounded by either BMV land or flood plain meaning an alternative spatial strategy would not avoid allocating BMV land for development.

7.2.21 In terms of distance from Caldicot town centre, it is approximately 1.2 miles (from a central point of the growth area) and approximately 22-minutes walking distance. It is approximately a 33-minute walk from Caldicot railway station. The former railway line has recently been purchased by MCC and is being turned into an active travel route, offering a significant benefit in terms of modal shift and leisure provision. Landscape sensitivity to residential development is high/ medium. Part of this site is within the limestone minerals safeguarding area.

7.2.22 This allocation could helpfully identify the long-term direction of growth for the town. This longer-term potential is advantageous.

8. ISA Findings of the Deposit Plan at this Stage

8.1 Introduction

8.1.1 The aim of this chapter is to present an appraisal of the RLDP, as currently presented in the Deposit Plan.

8.2 Methodology

8.2.1 The appraisal of the Deposit Plan identifies and evaluates 'likely significant effects' of the plan on the baseline, drawing on the ISA objectives identified through scoping (see Table 3.1) as a methodological framework.

8.2.2 Every effort is made to predict effects accurately; however, this is inherently challenging given the high-level nature of the policies under consideration and understanding of the baseline (now and in the future under a 'no plan' scenario) that is inevitably limited. Given uncertainties there is a need to make assumptions, e.g., in relation to plan implementation and aspects of the baseline that might be impacted. Assumptions are made cautiously and explained within the text (with the aim to strike a balance between comprehensiveness and conciseness/ accessibility). In many instances, given reasonable assumptions, it is not possible to predict 'significant effects', but it is nonetheless possible and helpful to comment on merits (or otherwise) of the Plan in more general terms.

8.2.3 Finally, it is important to note that effects are predicted taking account of the effect characteristics and 'significance criteria' presented within Schedules 1 and 2 of the SEA Regulations.[14] So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. Cumulative effects are also considered, i.e., the potential for the Plan to impact an aspect of the baseline when implemented alongside other plans, programmes, and projects. Explicit reference is made within the appraisal as appropriate (given the need to balance the desire of systematic appraisal with a desire to ensure conciseness/ accessibility).

8.3 Overview of the Deposit Plan

8.3.1 Strategic Policy S1 (Growth Strategy) and Strategic Policy S2 (Spatial Distribution of Development – Settlement Hierarchy) set the spatial strategy for housing and employment growth in Monmouthshire during the plan period. To implement the RDLP's Strategy, strategic site allocations are identified within Policies HA1 to HA4 for the primary settlements of Abergavenny, Caldicot, Chepstow, and Monmouth. Each of the strategic site allocations has been subject to ISA, as detailed in Chapter 6 and Appendix D, and the findings of this work has informed this appraisal.

8.3.2 Policy S1 states that the RLDP will make provision for 6,210 homes (to meet a housing requirement of 5,400 homes, including a 15% flexibility allowance), and a minimum of 38 hectares of employment land over the plan

[14] Environmental Assessment of Plans and Programmes Regulations 2004

period 2018-2033. As set out in Policy S2, the focus of this development will be to the County's most sustainable settlements of Abergavenny, Caldicot, Chepstow, and Monmouth, including Severnside, as well as some growth in the most sustainable rural settlements to deliver much needed affordable homes, and to address rural inequality and rural isolation in these areas.

8.3.3 Policy S2 sets out the indicative proportion of residential growth to be accommodated by each of the settlement tiers. The Settlement Hierarchy reflects the findings of the Sustainable Settlement Appraisal[15], which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. Table 8.1 out a summary of the overarching indicative spatial distribution of housing provision for the RLDP.

Table 8.1: Summary of indicative spatial distribution of housing provision

Settlement	Completions 2018-2023	Existing Commitments	Total Allowances (Small sites; Windfalls)	LDP Rollover Allocations	RLDP New Housing Allocations (Dwellings)	Total RLDP Housing Provision
Abergavenny (incl. Llanfoist)	537	29	196	0	600	1,362
Chepstow	448	81	154	0	146	829
Monmouth (incl. Wyesham)	286	70	77	160	330	923
Caldicot (incl. Severnside)	663	555	162	0	805	2,190
Secondary Settlements	109	38	67	0	136	350
Rural Settlements	177	25	231	15	113	556
Total	2,220	798	887	175	2,130	6,210

8.3.4 Policy S2 also outlines the distribution of employment growth, as shown in Table 8.2.

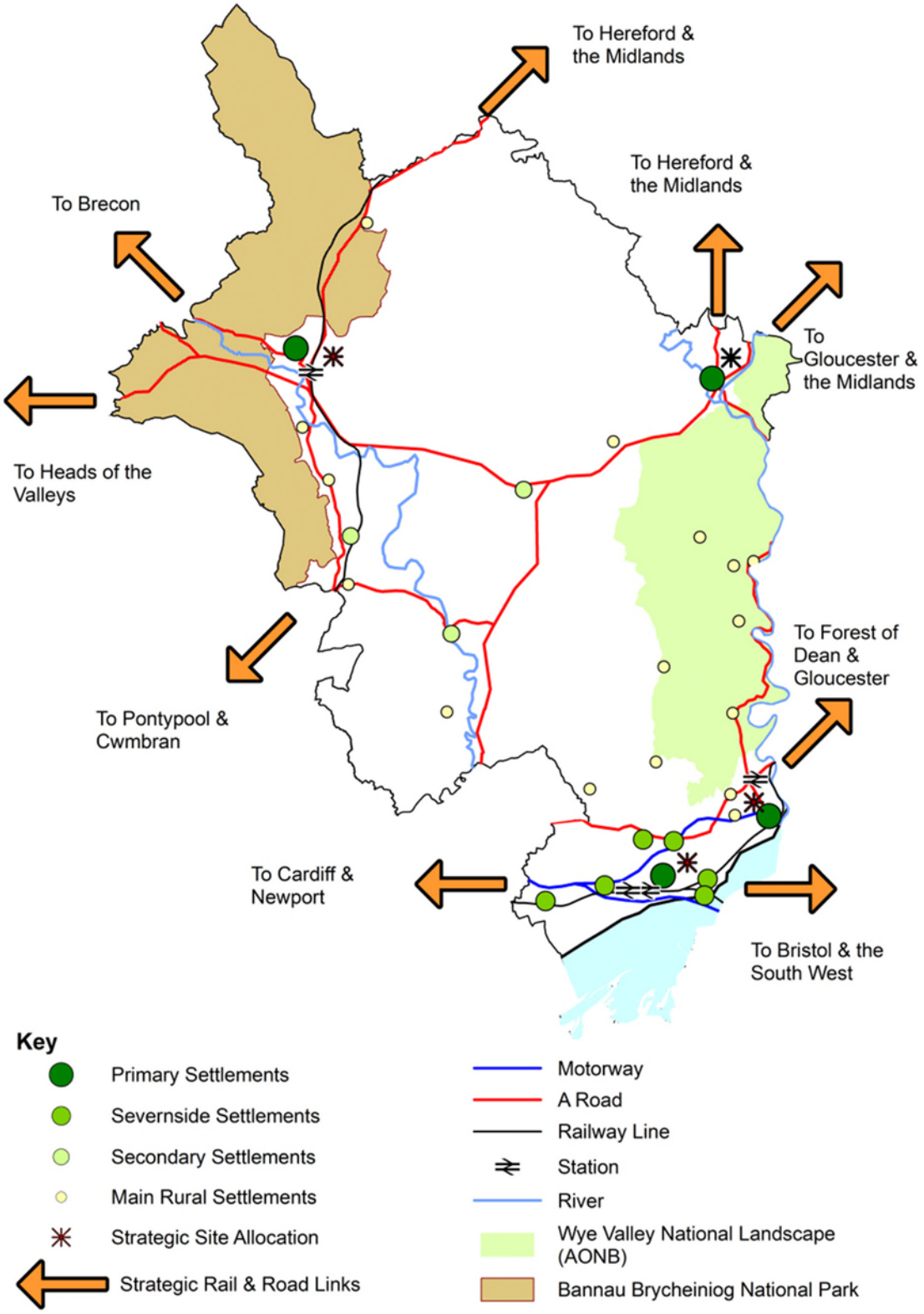
[15] The Sustainable Settlement Appraisal 2020 can be viewed on the Council's website via the following link: https://democracy.monmouthshire.gov.uk/documents/s26562/Appendix%201%20Sustainable%20Settlement%20Appraisal%20March%202020.pdf

Table 8.2: Distribution of employment land

Settlement	% of employment growth distribution	Hectares
Abergavenny (incl. Llanfoist)	3	1.7 (note: The Council will continue to explore opportunities to bring forward vacant premises in Abergavenny for employment use, in conjunction with the CCR / relevant partners)
Chepstow	11	6.4
Monmouth (incl. Wyesham)	10	5.84
Caldicot (incl. Severnside area comprising of: Caerwent, Crick, Magor, Undy, Portskewett, Rogiet and Sudbrook)	65	37.86
Secondary settlements of Penperlleni, Raglan and Usk	10	6.05

8.3.5 The RLDP key diagram is provided in Figure 8.1.

Figure 8.1: RLDP Key Diagram



8.4 Economy and employment

8.4.1 Strategic Policy S1 (Growth Strategy) states that the RLDP will make provision for 6,210 homes (to meet a housing requirement of 5,400 homes) and a minimum of 38 hectares of employment land over the Plan period 2018-2033. The proposed distribution of these homes is set out in Strategic Policy S2 (Spatial Distribution of Development – Settlement Hierarchy) and shown in Table 8.1. The proposed distribution of employment land is also set out in Strategic Policy S2 (Spatial Distribution of Development – Settlement Hierarchy) and shown in Table 8.2. New and protected employment areas are also included under Policy EA1 (Employment Allocations) and Policy EA2 (Protected Employment Sites).

8.4.2 The spatial strategy performs positively in relation to the ISA objective to maximise the economic contribution of the area to the Cardiff City, Bristol, and wider South West Region, particularly in respect of directing strategic allocations for housing growth to locations from which key regional employment hubs can be accessed. Abergavenny (including Llanfoist) and Chepstow each have existing rail connections to both Newport and Cardiff, with services to Cardiff taking around 40-45 minutes from Abergavenny and around 40 minutes from Chepstow. Within the Severnside area, Caldicot has been classified as a higher tier settlement, with functional transport links to the smaller settlements of Rogiet, Caerwent, Portskewett, Sudbrook and Crick. Caldicot Train Station connects the town to the employment areas of Newport, Cardiff, and Bristol. Whilst Monmouth does not have a train station, it allows for sustainable transport access via bus services to locations like Abergavenny and Hereford and is also adjacent to the A40. This road provides vehicular connections to the wider strategic network – Newport is an approximate 30-minute drive to the south-west.

8.4.3 Directing growth to these locations responds positively to the removal of the Severn Bridge Tolls; a multi-modal transport network with services fulfilled by a combination of heavy rail, light rail and bus rapid transit. Higher growth in this part of the County will capitalise upon the continuing economic growth of the Bristol/ South West region and the opportunities for Monmouthshire as a border County located between the ‘Great Western Cities’. Furthermore, directing growth close to the M4/ M48 will provide residents with good access to economic opportunities throughout the region, utilising the infrastructure connections to the South of the County.

8.4.4 It is considered likely that sustainable travel upgrades will be seen across the Primary Settlements, including an increase in the capacity of travel modes, increased frequency of services to Newport and Cardiff, and reduced journey times. This will enable workers to access key employment centres and jobs markets more quickly and more frequently, boosting the local and regional economy. Furthermore, Policy H1 (Residential Development in Primary and Secondary Settlements), Policy H2 (Residential Development in Main Rural Settlements) and Policy H3 (Residential Development in Minor Rural Settlements) all work to safeguard existing retail and employment space through new-build residential development and the redevelopment/ conversion of existing structures. Furthermore, Policies RC1 (Central Shopping and Commercial Areas), RC2 (Primary Shopping Frontages), RC3 (Local Centres and Neighbourhood Centres / Shops) and RC4 (New Retail

Proposals Outside of Identified Town and Local Centres) contribute to protecting existing and bringing forward further retail opportunities, thus working towards maintaining and enhancing the local economy.

8.4.5 Distributing housing and employment growth between Abergavenny (including Llanfoist), Chepstow, Caldicot (including Severnside) and Monmouth (including Wyesham) will help ensure growth is dispersed across the plan area and not simply concentrated towards the M4 corridor in the south. For example, despite being accessible to Cardiff, Abergavenny is sufficiently far north that it serves as the regional centre for a number of smaller settlements in the north of the plan area. By delivering substantial growth at Abergavenny, including through the strategic site Land to the East of Abergavenny (Policy HA1 – for 500 homes over the plan period) and through Policy HA5 (Land at Penlanlas, Abergavenny – for 100 homes over the plan period), the spatial strategy will help sustain the rural economy of the smaller settlements which Abergavenny supports. It is noted that the strategic allocation under Policy HA1 (Land to the East of Abergavenny) will deliver a residential-led mixed-use development, including a mixed-use hub, and park and ride services. This will contribute to enhancing access to employment opportunities and services that support the local economy by bringing forward new/ additional opportunities within Abergavenny itself and improving connections to the transport network.

8.4.6 By also distributing a substantial proportion of growth to the Severnside settlements, the spatial strategy is likely to deliver further positive effects in relation to the economy and employment. The Severnside settlements (Caldicot, Caerwent, Crick, Magor Undy, Portskewett, Rogiet and Sudbrook) are strategically located for access to the M4/ M48 corridors and to rail services between Cardiff and Bristol. The area is already well served by public transport via Caldicot and Severn Tunnel Junction stations and, as with other Tier 1 settlements, public transport connectivity is likely to be enhanced later in the plan period as the rollout of the SE Wales Metro progresses. Given the scale of growth proposed at Caldicot under Policy HA2 (Land to the East of Caldicot – for 770 homes over the plan period), it is considered that improvements to the sustainable/ active travel network would likely be delivered alongside housing and employment. This includes stipulations made under Policy HA2 (Land to the East of Caldicot) for pedestrian and cycle links within and to the new development area, including from Caldicot Town Centre and the former MoD railway, cycle, and walking routes.

8.4.7 The strategic site allocation under Policy HA2 (Land to the East of Caldicot) will also deliver residential-led mixed-use development, including a local centre with appropriate community facilities, and employment space. As such, it is considered the strategic site will make a considerable economic contribution to the Cardiff City Region, as locating housing and employment growth in close proximity to regional economic opportunities has the potential to lead to significant long term positive effects. It is also noted that Policy HA9 (Land at Former MOD land, Caerwent, for 40 homes over the plan period) is put forward for a mixed-use residential scheme, including employment land.

8.4.8 The Severnside settlement cluster already represents a key employment hub in its own right and delivering housing growth will help ensure the continued vitality of key employment sites such as Castle Gate Business Park at Caldicot and the AB InBev brewery at Magor. However, strategic housing growth at the south of the County is likely to also prove an attractive location for workers who commute to employment hubs outside the Cardiff City Region, particularly those who commute to Bristol which is a short drive or train journey away.

8.4.9 The strategic site allocation in Chepstow under Policy HA3 (Land at Mounton Road, Chepstow, for 146 homes over the plan period) is proposed for residential use and commercial uses, for example, hotels or residential care homes. Whilst this is unlikely to encourage a large level of inward investment and support local economic growth directly, delivering growth in this location will increase the local workforce and support tourism. As such, development of the site will contribute towards the local/ wider economy, with potential for long-term positive effects.

8.4.10 The Preferred Strategy (December 2022) proposed no new site allocations in the primary settlement of Monmouth, or within the upper River Wye catchment north of Bigsweir Bridge, due to the lack of an identified strategic solution to the treatment of phosphates at the Monmouth Wastewater Treatment Works (WwTW) within the Plan period. However, new site allocations have been considered in Monmouth (including Wyesham) on the basis that sufficient certainty is provided by Dwr Cymru Welsh Water's (DCWW) planned improvements at the Monmouth Wastewater Treatment Works by 31st March 2025. As such, development in the area will help to address concerns in Monmouth over a reduced working age population.

8.4.11 One strategic allocation is made within Monmouth under Policy HA4 (Land at Leasbrook, for 270 homes over the plan period), and three further sites are proposed under Policy HA6 (Land at Rockfield for 60 homes over the plan period), Policy HA7 (Land at Drewen Farm for 110 homes over the plan period), and Policy HA8 (Tudor Road, Wyesham for 50 homes over the plan period). Whilst these policies focus only on residential development, they are anticipated to bring forward positive effects in relation to this ISA theme by increasing the working age population in the area and bringing forward additional spending within the local economy.

8.4.12 The additional housing development sites under policies HA10 to HA18 also have a residential focus. Whilst these policies do not make provision for employment land, it is considered that they will bring forward positive effects through locating housing in proximity to economic opportunities in the area.

8.4.13 Strategic Policy S10 (Employment Sites Provision) sets out the quantum of employment land to be delivered throughout the Plan period, in accordance with the Spatial Strategy and the recommendations of the Employment Land Review (ELR) (2022). This is supported by Policy E1 (Protection of Existing Employment Land) and Policy E2 (Non-Allocated Employment Sites), which seek to maintain and enhance employment levels by safeguarding existing sites and supporting new sites for industrial and business development.

8.4.14 In line with Strategic Policy S10, provision will be made for a minimum of 57 hectares of land on a suitable range and choice of sites for industrial and

business development (classes B1, B2 and B8). This minimum requirement reflects a forecast scenario based on past take-up rates and includes a five-year buffer to allow for choice and uncertainty in forecasting. Strategic Policy S10 also seeks to protect existing employment land from conversion to "*alternative forms of development*". When considering the existing employment land supply, it is recognised that the large existing employment allocation at Quay Point, Magor, accounts for a significant mass of land of the available supply of employment land at one site (13.76ha). The Deposit Plan highlights the need for further supply to meet the shortfall of supply and enable further flexibility in the market in terms of types of land and locations.

8.4.15 The other strategic policies likely to have a direct effect in relation to economy and employment are Strategic Policy S11 (Rural Economy) and Strategic Policy S12 (Visitor Economy), given that they seek to support the diversification of the rural economy and support the visitor economy and promote sustainable forms of tourism. This is supported by Policy T1 (New or Extended Tourism Accommodation and Facilities in the Open Countyside), and Policy T2 (Protection of existing tourism facilities). Future Wales (2021) has expressed a commitment to supporting vibrant rural areas and improving the rural economy[16]. The National Plan Policy 4 – Supporting Rural Communities, and Policy 5 – Supporting the Rural Economy, establish the national policy approach for LDPs to plan positively to meet the employment needs of rural areas through appropriate and proportionate economic growth. Strategic Policy S11 (Rural Economy) therefore seeks to sustain and enhance the economy of the County's rural settlements to ensure their continued viability, which is likely to have a long term positive effect on this theme. This is achieved through the supporting policies RE1 (Secondary and Main Rural Settlements Employment Exceptions), RE2 (The Conversion or Rehabilitation of Buildings in the Open Countryside for Employment Use), RE3 (Agricultural Diversification), RE4 (New Agricultural and Forestry Buildings), RE5 (Intensive Livestock/ Free Range Poultry Units), and RE6 (Provision of Recreation and Leisure Facilities in the Open Countryside).

8.4.16 The role of the rural economy is considered through Strategic Policy S12, which recognises the significance of tourism to Monmouthshire's economy, with the supporting text of the policy stating that "*in rural areas tourism related development is an essential element in providing for a healthy diverse local economy*". By establishing support in principle for development which provides or enhances sustainable tourism Policy S12 will help support and grow the tourism sector which has the additional benefit of distributing employment opportunities throughout small settlements and rural areas of the County. Collectively, this suite of policies is considered to perform positively in relation to the ISA objectives of contributing to the local economy, strengthening, and diversifying the economy, and ensuring a distribution of employment opportunities throughout the plan area.

8.4.17 PPW12 equally values the importance of tourism to economic prosperity and job creation and its ability to act as a catalyst for environmental protection, regeneration, and improvement in both urban and rural areas. Strategic Policy S14 (Town, Local and Neighbourhood Centres) establishes a four-tier retail hierarchy, with the broad retail offer of the four 'County towns' of

[16] Welsh Government (2020) Future Wales: the national plan 2040 [online] available at: https://gov.wales/future-wales-national-plan-2040#FutureWales:TheNationalPlan2040

Abergavenny, Caldicot, Chepstow and Monmouth recognised as being of significance not just to the towns themselves but also their wider rural hinterlands. The 'Minor County Town Centres' of Usk and Magor are located on the second tier, and the 'Local Centres' of Raglan and Bulwark are in the third tier. These centres are recognised as serving a more local convenience function, whilst the fourth tier applies to neighbourhood centres within larger settlements. Linked to this, Strategic Policy S6 (Infrastructure) seeks to secure improvements in infrastructure, facilities, services and related works across the four-tier retail hierarchy. This includes health infrastructure and facilities, and recreation and leisure facilities which will likely provide local employment opportunities.

8.4.18 Welsh Government's commitment to better places, placemaking, quality outcomes, and good design is evidenced throughout the Building Better Places (2020) Document, which identifies town centres as a policy area that should be the focus of consideration and action, in order to act as a catalyst for a recovery. The RLDP policy intention is therefore to protect town and local centre vitality and sustain the County's main settlements as "*vibrant and attractive centres*" to ensure that they "*remain attractive places to live and visit*". This is considered to perform positively in relation to the ISA objective to enhance the viability and vitality of town centres.

8.4.19 In terms of supporting the rural economy and tourist economy, Strategic Policy S5 (Green Infrastructure, Landscape and Nature Conservation) could have potential for indirect positive effects by protecting natural and built heritage attractions and thereby encouraging tourism development and tourist spend. For example, Strategic Policy S5 seeks the protection of landscape and townscape character to protect and enhance "*landscape setting and quality of place*", and also highlights the importance of resilient ecosystems.

8.4.20 Whilst highlighted as a key issue for the RLDP, the policies are largely silent on skills and training. Skills and training are important considerations in terms of aligning the RLDP with current and emerging economic opportunities at both a local and regional scale, i.e., the City Deal and the Skills for the Future Project. As discussed above, the RLDP sets out support for inward investment and local employment growth/ opportunities; however, it could be further strengthened by establishing a policy position on delivering high quality skills and training.

Cumulative effects

8.4.21 Cumulatively, Monmouthshire's location within the ten-authority Cardiff City Region gives it a broad regional context, and its location at the eastern edge of the region means it is also within the influence of economic hubs in England, particularly the Bristol City Region and local economic hubs in Gloucestershire and Herefordshire. In this context there are potential cumulative effects on the regional economy from development in the plan area and vice versa.

8.4.22 The Cardiff Capital Region City Deal identifies regional economic challenges and opportunities for the ten authorities which comprise the Cardiff Capital Region. Addressing economic challenges and maximising opportunities are right at the heart of the rationale behind the City Deal and there is likely to be

significant potential for positive cumulative effects in relation to economy and employment in this context.

8.4.23 Development proposals in Newport are likely to be of particular significance in terms of cumulative effects from growth in Monmouthshire. Identified as a National Growth Area, Newport is a significant employment hub and population centre adjacent to Monmouthshire's southern boundary. The additional employment land and housing delivery in Newport could provide additional regional employment opportunities for workers from Monmouthshire and could potentially further bolster the business case for the eastward expansion of the South East Wales Metro. There could be particular cross boundary significance in relation to housing growth at the Severnside settlements as this could directly support the vitality of employment hubs along the M4 corridor. This will help maximise regional economic opportunities and is considered likely to have significant long term positive effects in relation to Monmouthshire and the Cardiff Capital Region more broadly. The Newport LDP also safeguards land for major road schemes including improvements to the M4 Motorway Junction 28, western extension of the Southern Distributor Road as the Duffryn Link Road between Maesglas and Coedkernew and the North South Link - Llanwern. Proposed development could increase traffic along the M4, A4042 and A449. However, in time the SE Wales Metro will likely to relieve some of this additional traffic burden, particularly in relation to radial commuting between Monmouth/ Abergavenny/ Chepstow and employment hubs at Newport and Cardiff.

8.4.24 The visitor economy is significant in Monmouthshire and the Brecon Beacons National Park is a key component of this in terms of visitor accommodation and associated services. The Brecon Beacons National Park Authority is its own LPA and therefore is able to propose development within Monmouthshire but outside the Monmouthshire LDP plan area. Growth in the key settlements of Brecon, Crickhowell, Hay-on-Wye and Talgarth is not likely to result in any significant interactions with development being proposed through the Monmouthshire RLDP. Therefore, no significant effects are anticipated in relation to economy and employment.

8.4.25 It is also considered that cumulative positive effects are likely in relation to economy and employment from growth at Abergavenny and growth along the Heads of the Valleys corridor as this will continue to support and grow the regional economy.

8.4.26 The two English LPAs of Herefordshire Council and Forest of Dean District Council are adjacent to the plan area's eastern boundary, with much of the boundary of both comprising the Wye Valley Area of Outstanding Natural Beauty (AONB). There are key settlements in both authorities which have strong functional links with Monmouthshire as both Ross-on-Wye in Herefordshire and Coleford in Gloucestershire are located a short distance from Monmouth along the A40 and A4136 respectively. Housing and employment growth could have the potential to increase traffic, especially on key roads into and out of Monmouth in particular, and on the A48 through Chepstow to Tutshill and Sedbury. However, positive effects are considered likely overall by virtue of supporting the wider regional economy.

Summary of likely effects

8.4.27 Overall, the employment land protections and provisions, alongside well-connected housing and town / local centre development are considered likely to lead to **significant positive effects** for this ISA theme. Additional provisions that seek to improve the local environment and sustainable and active travel connections will also bolster positive effects and support the rural economy and tourism growth.

8.5 Population and communities

8.5.1 A key consideration under the population and communities ISA theme is the provision of the right number of homes in the right places, including delivering a sufficient mix of housing types and tenures to meet different identified needs within the community.

8.5.2 In accordance with Strategic Policy S1 (Preferred Growth Strategy) the RLDP will deliver approximately 5,400 – 6,210 homes over the Plan period 2018-2033. The level of housing need is based on a demographic-led scenario with added policy assumptions[17], providing a level of growth (homes and jobs) that maximises the extent to which local evidence-based issues and objectives in the south of the County and River Usk catchment area can be addressed, whilst also having regard to Welsh Government officer concerns regarding alignment with Future Wales: the National Plan 2040.

8.5.3 This level of growth is in general conformity with Future Wales' overall strategy. Although Monmouthshire is not within the national growth area identified in Future Wales 2040: the National Plan, supporting evidence shows that the proposed level of growth is essential to deliver the County's local evidence-based issues and objectives and ensure the RLDP is sound. It is supported by Future Wales policies 4, 5 and 7 in particular which support rural communities, the rural economy and the delivery of affordable homes.

8.5.4 Strategic Policy S1 (Growth Strategy) identifies a total housing target of 6,210 dwellings over the plan period based on a 15% flexibility allowance. On this basis, Strategic Policy S1 (Growth Strategy) is considered to have a significant long term positive effect as it proposes the delivery of enough new homes to meet identified needs, including affordable housing needs, and includes some flexibility should any sites not come forward.

8.5.5 In terms of the location of new housing and employment, Strategic Policy S2 (Spatial Distribution of Development – Settlement Hierarchy) identifies the level of growth to come forward across the different settlement types. It identifies four strategic growth areas in the main towns of Abergavenny (inc. Llanfoist), Caldicot, Chepstow (inc. Severnside), and Monmouth (inc. Wyesham), which have been considered through the ISA process. These sites have provided sufficient evidence of viability and deliverability that will be built on as the plan progresses.

[17] Demographic-led option for the LPA area (i.e. excludes the BBNP area within Monmouthshire) using ONS 2020 MYE base and applying assumptions in relation to migration, household membership rates and commuting ratio, as set out in the Housing Background Paper.

8.5.6 Of note is Land to the East of Caldicot (Policy HA2), the largest of the strategic site allocations, which seeks to deliver 770 homes within a relatively deprived part of the community. In line with Strategic Policy S6 (Infrastructure), the strategic site will include a range of supporting infrastructure (education, employment, retail, and leisure) which will likely lead to positive effects in terms of supporting self-sustaining communities. Positive effects in this respect are also anticipated through the delivery of the strategic site Land to the East of Abergavenny (Policy HA1), which is also proposed for mixed use, including community uses.

8.5.7 More broadly, it is considered that the Spatial Strategy represents a reasonable approach to the distribution of growth as it will ensure that the delivery of new homes is focussed at the most sustainable locations and where there is greater need, i.e., the larger settlements which offer the broadest range of services, facilities, and transport options. Under Strategic Policy S2 (Spatial Distribution of Development – Settlement Hierarchy), Abergavenny is allocated 22% of growth over the plan period, Chepstow 13%, Monmouth (including Wyesham) 15%, and Caldicot (including the Severnside area) 35%. This translates to around 1,362 dwellings at Abergavenny, 829 at Chepstow, 923 at Monmouth, and 2,190 across the Severnside area. This growth is put forward under policies HA1 (Land to the East of Abergavenny), HA2 (Land to the East of Caldicot), HA3 (Land at Mounton Road, Chepstow), HA4 (Land at Leasbrook, Monmouth), HA5 (Land at Penlanlas Farm, Abergavenny), HA6 (Land at Rockfield Road, Monmouth), HA7 (Land at Drewen Farm, Monmouth), HA8 (Land at Tudor Road, Wyesham, Monmouth), and HA9 (Land at Former MoD, Caerwent). Growth is also put forward through committed sites, windfall sites, and infill opportunities – including those under policies HA10 to HA18.

8.5.8 The three secondary settlements of Penperlleni, Raglan and Usk are apportioned 6% (350 dwellings). This growth is included under allocation policies HA10 (South of Monmouth Road, Raglan), HA11 (Land east of Burrium Gate, Usk) and HA12 (Land west of Trem yr Ysgol, Penperlleni). The remaining dwellings would be distributed between the main and minor rural settlements, and through policies HA13-HA18. Growth is also put forward through committed sites, windfall sites, and infill opportunities. The strengths of this approach are that smaller settlements receive some allocated housing growth, helping to meet local housing need where it arises and ensuring the benefits of growth, such as the provision of new community infrastructure, are not simply directed to the highest tier settlements. This will likely ensure the delivery much needed affordable homes in the right places and address rural inequality and rural isolation in the lower tier areas.

8.5.9 Affordable housing is one of the key challenges facing the County's communities. The RLDP specifically seeks to address housing affordability, committing to the delivery of 1,595 – 2,000 affordable homes. This includes on the strategic site allocations, which will have on-site provision of affordable homes at 50% (Strategic Policy S7 Affordable Housing). Furthermore, Strategic Policy S7 (Affordable Housing) also outlines affordable housing thresholds for different sized residential development within settlement boundaries. This includes 50% on-site affordable housing on all new site allocations, 50% on-site affordable housing on sites of 20+ homes, and 40% on-site affordable housing on sites of 5-19 homes. For

developments of 1-4 homes, financial contributions towards the provision of affordable housing in the wider Monmouthshire area will be required; the same is required where conversions and subdivisions of houses is proposed. Linked to this, Policy H9 (Affordable Housing Exception Sites) outlines support for additional affordable housing adjoining Tier 1, 2, 3 and 4 settlements on sites that would not otherwise be released for residential development.

8.5.10 The commitment to affordable housing will lead to long-term positive effects, helping tackle Monmouthshire's housing need, homelessness, and social inequality. The supporting text of Strategic Policy S7 (Affordable Housing) highlights the significance of affordable housing for the RLDP, forming an integral part of the overarching Strategy. Provision will contribute positively towards addressing issues associated with the County's high house prices (relative to the Welsh average and relative to earnings), such as difficulties attracting and retaining younger age groups and anticipated increased demand for housing in Monmouthshire related to the removal of the Severn Bridge Tolls.

8.5.11 On balance it is considered that the Deposit Plan performs broadly positively in relation to the population and communities ISA theme given it will deliver above the level of objectively assessed housing need. In line with the Settlement Hierarchy, growth will be focused to the primary settlements of Abergavenny (including Llanfoist), Caldicot (including Severnside), Chepstow and Monmouth (including Wyesham), together with a sustainable amount of growth to the most sustainable lower tier settlements. The Settlement Hierarchy reflects the findings of the Sustainable Settlement Appraisal, which groups settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth.

8.5.12 Other strategic policies likely to have a direct effect in relation to population and communities are Strategic Policy S3 (Sustainable Placemaking & High Quality Design) and Strategic Policy S6 (Infrastructure). Strategic Policy S3 establishes a range of criteria by which development will be expected to contribute to "*high quality, attractive and sustainable places that support the health and well-being of the community and respond to climate change*". This includes safe and inclusive design, co-locating different land uses to maximise public transport accessibility, incorporating green infrastructure and leveraging the natural, historic, and built character of a site to contribute to quality placemaking. This is reiterated in the supporting Policy PM1 (Creating well-designed places). This also links to Strategic Policy S8 (Site Allocation Placemaking Principles) – which seeks to ensure residential development complies with placemaking principles, including a mix of housing types, tenures and sizes and ensuring a safe and secure environment for all the community.

8.5.13 Strategic Policy S6 (Infrastructure) emphasises the importance of infrastructure in ensuring the sustainability of new development. The policy presents a comprehensive approach to seeking suitable new infrastructure through the development process, effectively establishing a hierarchy of mechanisms for infrastructure delivery. It sets an expectation that new or improved infrastructure "*must be provided as part of the proposed*

development". Furthermore, "*where provision on-site is not appropriate, off-site provision, or a financial contribution towards it, will be sought*". An expansive list of potential planning obligations is also presented which will be sought including infrastructure improvements that are "*necessary to make development acceptable".* This policy is supported by Policy IN1 (Telecommunication, broadband and other digital infrastructure), which seeks to ensure appropriate infrastructure will come forward to support communities.

8.5.14 Strategic Policy S15 (Community and Recreation Facilities and Areas of Amenity Importance) performs positively in terms of planning for sustainable communities, focussing on ensuring provision or enhancement of accessible community and recreation facilities, defined in the supporting text as "*facilities used by the local* communities *for leisure, social, health, education and cultural purposes*". It also establishes a presumption against the unjustified loss of such facilities. This is supported by Policy CI1 (Retention of Existing Community Facilities), Policy CI2 (Provision of Formal and Informal Open Space and Allotments / Community Growing Areas), Policy CI3 (Safeguarding Existing Recreational Facilities, Public Open Spaces and Allotments / Community Growing) and Policy CI4 (Areas of Amenity Importance), which all seek to maintain and enhance community infrastructure for the benefit of the populations in Monmouthshire.

8.5.15 It is important that the RLDP plans for the needs of the gypsy and travellers as well as the settled community. Strategic Policy S9 (Gypsy and Travellers) seeks to address this through a high-level commitment that "*land will be made available at Bradbury Farm, Crick for 7 pitches to accommodate unmet Gypsy and Traveller accommodation needs*". This is supported by Policy GT1 (Gypsy, Traveller and Showpeople Sites).

8.5.16 The wider policies also work to bring forward benefits for the population and communities ISA theme. Policy GW1 (Green Wedge Designations) seeks to safeguard several key areas of land between settlements. This helps to retain individual settlement and community identities. Furthermore, Strategic Policy S13 (Sustainable Transport) works to support population and communities through maintaining and improving transport networks, allowing for a level of connectivity within and between settlements. Strategic Policy 14 (Town, Local and Neighbourhood Centres) also works to support population and communities through enhanced retail, commercial and social developments; this will help to support communities and reduce their need to travel outside of their settlements to access key services and facilities. This policy is supported by Policy RC1 (Central Shopping and Commercial Areas), Policy RC2 (Primary Shopping Frontages), Policy RC3 (Local Centres and Neighbourhood Centres / shops) and Policy RC4 (New Retail Proposals Outside of Identified Town and Local Centres). The need to protect and enhance retail, commercial and social development is also reflected in policies H1 (Residential Development in Primary and Secondary Settlements), H2 (Residential Development in Main Rural Settlements), and H3 (Residential Development in Minor Rural Settlements), which all seek to ensure development protects existing community uses.

Cumulative effects

8.5.17 Development proposed within the Preferred Strategy has the potential for cumulative effects with growth proposed by other authorities within and beyond the Cardiff Capital Region, particularly in relation to the supply of a sufficient quantity of the new homes in sustainable locations.

8.5.18 The adopted and emerging development plans of all the surrounding local authorities propose meeting or exceeding their housing need. This means that the Deposit Plan's proposed housing delivery is contributing to a regional position of housing and infrastructure needs being met where it arises, which is a significant positive cumulative effect in relation to the population and communities ISA theme.

8.5.19 In this context there are likely to be positive effects in relation to accessibility to services and facilities throughout South Wales from the in-combination effects of proposed enhancements to cross-boundary public transport through the Cardiff City Deal. The County will also benefit in this respect from its links to England; Herefordshire to the north-east, South Gloucestershire and the Forest of Dean District to the east (on the other side of the River Wye), with links to South Gloucestershire via the Severn Bridge. Any cross-boundary sustainable transport improvements will make it easier to access existing services and facilities available at higher tier settlements, including those further afield at Newport, Cardiff, and Bristol, even in locations where the level of growth proposed may not support widespread provision of new local facilities.

Summary of likely effects

8.5.20 Considering the above, it is anticipated that implementation of the RLDP will likely lead to **significant positive effects**. This is due to its support of building sustainable and resilient communities across Monmouthshire and tackling the affordable housing challenge. This also reflects the focus of the RLDP on bringing forward different housing development (various types and tenures) in well-connected areas to meet the varying needs of the population.

8.6 Health and wellbeing

8.6.1 The Growth Strategy under Strategic Policy S1 (Growth Strategy) and Strategic Policy S2 (Spatial Distribution of Development – Settlement Hierarchy) provides a level of growth (homes and jobs) that maximises the extent to which local evidence-based issues and objectives in the south of the County and River Usk catchment area can be addressed, including in relation to the delivery of affordable homes, sustainable economic growth, rebalancing the demography by ensuring that young people can choose to live in the County and responding to the climate and nature emergency; whilst also having regard to Welsh Government officer concerns regarding alignment with Future Wales: the National Plan 2040, and the phosphate constraints in the Upper River Wye catchment.

8.6.2 By virtue of directing the majority of growth to settlements in the two highest tiers of the settlement hierarchy the preferred strategy is likely to focus growth at locations which offer the potential for sustainable access to local

services and facilities. For example, much of the growth directed to Abergavenny under Policy HA1 (Land to the East of Abergavenny) will likely be delivered within around 1.5 miles of the town centre, which is considered to be a reasonable cycling distance to access key facilities and services. Furthermore, the site allocated under Policy HA3 (Land at Mounton Road, Chepstow) is located within the Chepstow settlement boundary to the west – allowing for easy access to services and facilities in the centre along the A48. The same can be said of the site allocated under Policy HA4 (Land at Leasbrook, Monmouth) – which is located within the Monmouth settlement boundary and adjacent to the A466.

8.6.3 Correspondingly, by directing a proportionately small amount of growth to Tier 3 and 4 the preferred strategy avoids significant growth at smaller settlements which are likely to have a higher rate of car dependency. This is consistent with the RLDP objective of enabling healthier lifestyles.

8.6.4 In relation to the largest of the strategic site allocations, Land to the East of Caldicot (Policy HA2), while the site has good proximity to local services, positive effects will also be delivered through the proposed mixed use local centre and employment space. This reflects the strategic nature of the site (770 homes), and will support sustainable, healthy communities.

8.6.5 The Growth Strategy also performs well by directing growth to locations with good potential for accessing services via healthy transport options (under policies HA6-HA18). While the actual degree of walking and cycling connectivity will partly be determined by detailed matters of design and layout, it is considered that in spatial terms, broadly positive effects can be concluded.

8.6.6 Consideration is also given under this ISA theme to the impact of the COVID-19 pandemic. Building Better Places Wales acknowledges the behavioural shift of increased cycling and walking activity, and new working from home patterns which have reduced overall need to travel. The RLDP policy framework seeks to maximise opportunities and further secure in the long -term this positive transport modal shift, kick started by the COVID-19 pandemic, from the car to active travel car-free journeys. Strategic Policy 13 (Sustainable Transport) performs particularly positively in this respect. Policy S13 (Sustainable Transport) stands out as being of particular significance in relation to health and wellbeing as it includes an explicit requirement for development proposals to "*reduce the need to travel*" and include "*promoting and prioritising active travel*". The policy identifies that the existing Active Travel Network in Monmouthshire will need enhancing and expanding to ensure that walking and cycling are effectively promoted, achieved through maintaining and improving the Active Travel Network Maps to maximise engagement. The Active Travel Network is established by the Active Travel (Wales) Act 2013 and requires authorities to seek continuous improvement in cycling and pedestrian infrastructure. This means the policy is underpinned by a strong legislative platform which could act as an effective hook for ensuring developers design-in walking and cycling connectivity to the existing network when delivering new developments.

8.6.7 This links to Policy PROW1 (Public Rights of Way), which seeks to protect the existing Public Rights of Way network and add to it where appropriate. Furthermore, the delivery and enhancement of green infrastructure through

the development process as per Strategic Policy S5 (Green Infrastructure, Landscape and Nature Recovery) is likely to be an important element of boosting walking and cycling.

8.6.8 Other strategic policies likely to have a direct effect in relation to health and wellbeing are Strategic Policy S3 (Sustainable Placemaking & High Quality Design), Strategic Policy S5 (Green Infrastructure, Landscape and Nature Recovery), and Strategic Policy S15 (Community and Recreation Facilities, Public Open Spaces and Areas of Amenity Importance). This is through the protection of existing green spaces and infrastructure, and the delivery of new green infrastructure, which will contribute to health and wellbeing by providing safe spaces to engage with physical activity, to the benefit of physical and mental health.

8.6.9 Furthermore, Strategic Policy S15 (Community and Recreation Facilities, Public Open Spaces and Areas of Amenity Importance) offers support in principle for development proposals which provide or enhance community facilities, the definition of which includes GP surgeries and health centres. This links to Strategic Policy S6 (Infrastructure), which indicates planning agreements and obligations will need to include the consideration and appropriate provision of a number of key services and facilities, including health infrastructure and facilities. Strategic Policy S15 (Community and Recreation Facilities, Public Open Spaces and Areas of Amenity Importance) also establishes a presumption against the unjustified loss of such facilities. It is considered that the policy is relatively passive, i.e., simply supports such facilities coming forward rather than actively seeks their provision. However, in the context of Monmouthshire, where the need for growth is not acute, this is considered a proportionate approach.

8.6.10 Strategic Policy S3 (Sustainable Placemaking & High Quality Design) could help support health and wellbeing by promoting the incorporation of "*an appropriate mix of uses, where applicable, to minimise the need to travel and to maximise opportunities for sustainable travel*". This is understood to mean delivering a mixed range of services and facilities across the different use classes at the same accessible location so that residents only need to walk or cycle to one place to access retail, employment, leisure and so on. This is supported by Policy PM1 (Creating well-designed places), which indicates all development will need to ensure a safe environment that supports the community and integrates multifunctional green and blue infrastructure and public open space within site boundaries. This will allow for safe engagement with physical activity, including active transportation. Health is further safeguarded through Policy PM2 (Environmental Amenity), which stipulates development proposals will need to ensure it does not cause significant harm to local health – including through air and water pollution. The health of residents is also considered through Policy H7 (Specialist Housing), which seeks to ensure specialist housing development and extensions are located close to key services and infrastructure to allow for safe and convenient access and allow for the provision of support and care. This will allow for older residents to remain in their homes for longer.

8.6.11 The importance of sustainable placemaking has been identified in the Building Better Places document. Policy priorities include placing greater emphasis on creating neighbourhoods that enable residents to stay and

move locally to access most services and amenities through revitalised town centres and the provision of locally accessible green spaces. Strategic Policy S3 (Sustainable Placemaking and High Quality Design) is therefore anticipated to lead to positive effects in terms of creating and sustaining high quality, connected communities. Other policies likely to perform positively in this respect include Strategic Policy 5 (Green Infrastructure, Landscape and Nature Recovery), Strategic Policy S14 (Town, Local and Neighbourhood Centres Hierarchy) and Strategic Policy S15 (Community and Recreation Facilities, Public Open Spaces and Areas of Amenity Importance).

8.6.12 Strategic Policy S14 (Town, Local and Neighbourhood Centres Hierarchy) focuses on ensuring retail, commercial and social development comes forward at levels appropriate to the settlement size. This will allow for the health and wellbeing of communities to be met within the settlements themselves. This is supported by Policy RC1 (Central Shopping and Commercial Areas), which seeks to safeguard the vitality, attractiveness and viability of central shopping and commercial areas within Abergavenny, Caldicot, Chepstow, Monmouth, Magor and Usk. This provides a further health and wellbeing benefit by protecting services and retail opportunities in these areas. The same can be said of Policy RC2 (Primary Shopping Frontages), which seeks to safeguard primary shopping frontages in Abergavenny, Caldicot, Chepstow and Monmouth, and Policy RC3 (Local Centres and Neighbourhood Centres / Shops).

8.6.13 Strategic Policy S15 (Community and Recreation Facilities, Public Open Spaces and Areas of Amenity Importance) is further supported by Policy CI1 (Retention of Existing Community Facilities) and Policy CI3 (Safeguarding Existing Recreational Facilities, Public Open Spaces and Allotments / Community Growing), which safeguards existing neighbourhood and community facilities from redevelopment.

8.6.14 It is also recognised that Monmouthshire is a largely rural plan area and in practice there will likely continue to be a degree of car dependency for many residents to reach some higher tier services and employment where these are not available locally. However conversely, the RLDP acknowledges the behavioural shift of increased working from home patterns, which has been brought about by the unprecedented impact of the COVID-19 pandemic.

Cumulative effects

8.6.15 The rural nature and substantial size of Monmouthshire contribute to its key settlements having a high degree of self-containment in terms of walking and cycling infrastructure, though some indirect inter-settlement connectivity exists through long distance rights of way and bridleways which crisscross the County. In this context there are limited strategic opportunities to seek cross boundary Active Travel Network infrastructure or to leverage the networks of other authorities in the region to build a coherent consolidated network. However, in the context of the Welsh Government's support for active travel and modal shift it is evident that individual authorities are increasingly seeking to incentivise walking and cycling. These efforts will likely contribute to a positive cumulative effect on the overall health outcomes of residents in the Cardiff Capital Region.

8.6.16 It is recognised that the role of the National Park as a sought-after destination for accessing the natural environment and growth within the Monmouthshire plan area will enable a greater number of people to access the Park for recreation and leisure with associated health and wellbeing benefits. For example, the Monmouthshire RLDP will deliver a substantial proportion of new residential development at Abergavenny from which access to the popular walking trails of Sugarloaf Mountain is easily achievable.

Summary of likely effects

8.6.17 Overall, it is considered that the RLDP will have **significant positive effects** on the health and wellbeing of Monmouthshire's population. This is through supporting development within proximity to key services and facilities in the higher tier settlements of Monmouth, Abergavenny, Chepstow and Caldicot. It also reflects the focus of the wider policies on bringing forward new infrastructure to support physical and mental health, for example green and blue infrastructure. This will ensure a continued high-quality service of resources in Monmouthshire.

8.7 Equalities, diversity, and social inclusion

8.7.1 The focus of the equalities, diversity, and social inclusion ISA theme is reducing poverty and inequality, tackling social exclusion, and promoting community cohesion. Many aspects of equalities, diversity and social inclusion do not have a spatial dimension and are unlikely to be directly affected by the spatial distribution of growth through the Preferred Strategy. For example, promoting community cohesion is likely to be most directly influenced through detailed policies which have the granularity to deliver focused responses at specific locations.

8.7.2 However, it is considered that focusing new development through Strategic Policy S1 (Growth Strategy) and Strategic Policy S2 (Spatial Distribution of Development – Settlement Hierarchy) on the primary settlements of Abergavenny (including Llanfoist), Chepstow, Caldicot (including the Severnside area), and Monmouth (including Wyesham), together with a sustainable amount of growth to the most sustainable lower tier settlements, will help to support and sustain a hierarchy of vibrant centres across the County. The delivery of strategic site allocations through Policy HA1 (Land to the East of Abergavenny), Policy HA2 (Land to the East of Caldicot), Policy HA3 (Land at Mounton Road, Chepstow) and Policy HA4 (Land at Leasbrook, Monmouth) will support the growth of and regeneration of existing communities, and improving access to housing, jobs, and services. This is especially true of Policy HA2 (Land to the East of Caldicot), which is allocated for mixed-use development – non-residential development under this policy (for example, the primary school and local centre) will contribute to the provision of Caldicot and its support of the settlement population.

8.7.3 Channelling an appropriate level of growth to the County's most sustainable locations, including rural settlements, is also considered to lead to positive effects, enabling local people to remain in their communities rather than have to seek opportunities for housing and employment elsewhere. This will be achieved through the delivery of housing through Policies HA5 to HA18.

8.7.4 However, it is difficult to conclude that growth in rural settlements and rural areas will address existing deprivation in terms of access to jobs, healthcare and opportunities as the distribution set out in Strategic Policy S2 (Spatial Distribution of Development – Settlement Hierarchy) (9% across Tiers 3 and 4) means growth will be unlikely of a scale which unlocks significant investment or enhancement in these areas. On balance, it is considered that the scale and distribution of growth is likely to have a minor positive effect in relation to equalities, diversity, and social inclusion.

8.7.5 Affordable housing provision is a key issue for the County and forms an integral part of the overarching strategy with 50% provision being sought on all new site allocations (Strategic Policy S7 Affordable Housing). This provision will assist in attracting and retaining a younger, economically active population and balancing the ageing population.

8.7.6 The provision of land for Gypsy and Travellers will also contribute to addressing equalities, diversity, and social inclusion. By designating land through Strategic Policy S9 (Gypsy and Travellers) and through the supporting Policy GT1 (Gypsy, Traveller, and Showpeople Sites), the RLDP is ensuring it provides for all communities within Monmouthshire. It also allows for enhanced levels of inclusion through ensuring sites are adjacent to settlement boundaries.

8.7.7 Other strategic policies most likely to have indirect effects on equalities, diversity and social inclusion are Strategic Policy S3 (Sustainable Placemaking and High Quality Design) and Strategic Policy S6 (Infrastructure).

8.7.8 There is clearly an economic and educational dimension to tackling poverty and exclusion as it is critical that people are given the opportunity to acquire skills and education which empowers them to enter the workplace and find stable, high-quality employment. In this sense Strategic Policy S6 (Infrastructure) could potentially play a role through the requirement to provide "*new or improved infrastructure and facilities to remedy deficiencies*" given that this includes education facilities. However, where deficiencies in provision currently exist it is not clear whether the policy would be effective in addressing the existing shortfall as well as providing additional capacity for new development, or whether this simply means existing provision would be deficient once additional growth is added. Effects are uncertain in this respect.

8.7.9 Placemaking can play a role in tackling social exclusion through well designed, barrier-free environments which can be entered and used safely and with dignity by all members of the community. Strategic Policy S3 (Sustainable Placemaking and High Quality Design) seeks sustainable places which support community wellbeing, including through the implementation of "*safe and inclusive design that offers ease of access for all*" and could have potential for minor positive effects. Related to this, Strategic Policy S5 (Green Infrastructure, Landscape and Nature Recovery) seeks to maintain, protect, and enhance the green infrastructure network in Monmouthshire – including accessible multifunctional interconnected spaces and routes.

8.7.10 Access to a range of types and tenures of genuinely affordable housing is an important element of tackling poverty and social exclusion – as demonstrated through Policy H8 (Housing Mix). Strategic Policy S7 (Affordable Housing) will therefore be a key lever by which affordable housing is delivered in Monmouthshire. The supporting text of the policy recognises that certain groups within the community are often particularly in need of affordable housing, such as elderly people and younger age groups who may otherwise not be able to afford to continue living locally. This links to Policy H7 (Specialist Housing), which seeks to permit specialist housing to provide for levels of support and care – allowing for older residents to remain in their homes for longer. In the context of Monmouthshire where average house prices are significantly above the average for Wales it will be of great importance that a sufficient range and choice of affordable housing is delivered which enables people to remain living in their community if they wish to do so.

Cumulative effects

8.7.11 Addressing the equalities, diversity and social inclusion objectives is not considered to be a primarily spatial matter. In this sense there are unlikely to be significant cumulative effects from development proposed in the Deposit Plan and development in surrounding authorities.

8.7.12 However, there is a degree of cross-cutting between the equalities theme and other ISA themes, particularly in relation to the role of affordable housing and educational opportunities in tackling entrenched poverty and deprivation. In this sense the fact that Monmouthshire and its regional partners are all proposing meeting or exceeding their housing need could be perceived as a positive, as it could offer opportunities to meet complex housing needs within particularly deprived communities, particularly in post-industrial settlements which have struggled over time to develop their economic vitality.

8.7.13 Additionally, it is recognised that the proposed enhancements to regional public transport through the Cardiff Capital Region City Deal and SE Wales Metro rollout will have potential to ease access to employment and training opportunities as well as services more broadly. Increased accessibility could have potential to reduce social exclusion and reduce some dimensions of deprivation.

8.7.14 It is considered that cumulative effects in relation to equalities, diversity and social exclusion are likely to be a minor positive effect overall. Although elements of tackling entrenched deprivation and inequality are likely to be influenced by targeted action addressing specific needs at a local level, the collective action of authorities at a regional scale is likely to deliver similar benefit, or potentially even greater benefit, from all the investment being stimulated through the Cardiff City Deal and other LDPs in the region.

Summary of likely effects

8.7.15 Considering the above, it is anticipated that **significant positive effects** will come forward as a result of the RLDP for this ISA theme. This is due to the focus on protecting existing and supporting new infrastructure in the neighbourhood area, thereby safeguarding, and improving access to important services and facilities. It also reflects policy requirements for

development that promotes accessible and inclusive places. The strategic allocations for housing development also contribute to equalities, diversity, and social inclusion – linked to their ability to provide a significant number of affordable houses that are supported by existing infrastructure within the primary settlements.

8.8 Transport and movement

8.8.1 The transport and movement ISA objectives include improving access to jobs and services, reducing private vehicle use through promoting active travel and encouraging modal shifts, and improving access to high-speed digital infrastructure. The Spatial Strategy seeks to maximise the opportunities presented by the COVID-19 pandemic, and subsequent behavioural shift seen in people's commuting patterns, such as increased working from home.

8.8.2 The distribution of growth proposed by the RLDP growth strategy performs reasonably positively in relation to the first of these objectives as it capitalises on existing transport links at the higher tier settlements to direct growth to locations served by transport hubs. By focusing new development on the primary settlements of Abergavenny (including Llanfoist), Chepstow, Caldicot (including the Severnside area) and Monmouth (including Wyesham), the strategy ensures that new residential development will be at locations with the strongest public transport links to other regional employment hubs, particularly Cardiff, Bristol, and Newport. Similarly, new employment growth in Abergavenny, Chepstow and Caldicot will be accessible by train.

8.8.3 Underpinning the spatial strategy are four strategic site allocations, proposed through Policy HA1 (Land to the East of Abergavenny), Policy HA2 (Land to the East of Caldicot), Policy HA3 (Land at Mounton Road, Chepstow) and Policy HA4 (Land at Leasbrook, Monmouth). All sites perform well in terms of improving access to jobs and services, including sustainable transport. For example, strategic sites at Abergavenny and Chepstow benefit from train stations served by frequent services, and the strategic sites at Caldicot and Monmouth are located adjacent to strategic roads (B2425 in Caldicot, and A466 at Monmouth).

8.8.4 Strategic growth focussed under Policy HA2 (Land to the East of Caldicot) is also positive in transport terms given that the area is served by two train stations. Both stations are within close proximity of each other at Rogiet and Caldicot, and it is also considered that given the level of growth proposed (770 homes in the plan period and further development beyond), supporting infrastructure for the site would be extensive.

8.8.5 Any infrastructure delivery would also support the far west of the Severnside area (including Magor) which is currently limited in terms of practical walking or cycling options for accessing either train station. It is further noted that that the new South Wales Metro plan designates Magor as a location for a rail station (Magor Walkway Station). It is considered that directing growth to the strategic site under Policy HA2 (Land to the East of Caldicot) is a clear positive, as it reduces growth in other locations with very limited public transport.

8.8.6 Furthermore, the strategic site allocation policies do make provisions for transportation and movement. All four policies seek to provide on and off-site highways infrastructure improvements – which will help ensure the existing transportation network is able to continue to support local journeys by new and existing residents. Policy HA1 (Land to the East of Abergavenny) indicates development will have a park and ride facility linking to the train station, and active travel networks to the train station and the settlement centre. It also indicates there will be good quality, safe and accessible pedestrian and cycle linkages to key access points (including key services and transport infrastructure), as well as greater connectivity with the existing public rights of way network. This will help to encourage a greater engagement with active and public transportation opportunities. Providing key connections to the town centre and walking and cycling routes is a focus of Policy HA2 (Land to the East of Caldicot).

8.8.7 The Active Travel (Wales) Act (2013) requires all local authorities in Wales to deliver improvements to their network of active travel routes and facilities. Monmouthshire's Active Travel Network includes walking and cycling paths within each of the principal settlements though inter-settlement connectivity is limited outside of the Severnside settlements (which are close enough for active travel to be a viable option, though this may be partly on-road). In this context new development through the RLDP performs well at a localised scale, offering good potential for new development to link with and enhance the existing network within settlements. However, the rural nature of the County and the distances between most of the higher tier settlements mean that the development is unlikely to have a positive effect in relation to the majority of inter-settlement travel.

8.8.8 The priority for the 'reduction in the need to travel' and a shift away from the private car for travel is reflected in the Welsh Government's Future Wales: The National Plan 2040 and 'Llwybr Newydd – The Wales Transport Strategy 2021'. The RLDP seeks to establish the foundations to encourage longer term changes to the historic high level of car usage in Monmouthshire. The spatial strategy therefore focuses development in the County's most sustainable settlements of Abergavenny (including Llanfoist), Chepstow Caldicot (including Severnside), and Monmouth (including Wyesham), that provide opportunities for a reduction in travel and provide opportunities for sustainable transport (see Sustainable Settlement Appraisal 2021).

8.8.9 However, Monmouthshire is predominantly a rural County and as set out in Future Wales Policy 5, there are clearly significant disparities between urban areas with regard to the feasibility of delivering effective public transport systems and active travel routes. To address this, Llwybr Newydd: the Wales Transport Strategy has committed to a 'Rural Pathway' which sets out how regional Corporate Joint Committees (CJCs) and Welsh Government policy makers will work together on strategies to tailor solutions to extend the geographical reach of public transport links into rural areas. This is reflected through Strategic Policy S13 (Sustainable Transport), which supports development in rural areas where it "*enables solutions to rural transport problems*".

8.8.10 The behavioural shift in people's commuting patterns since the COVID-19 pandemic is also acknowledged in the RLDP. It aims to build on the

increased cycling and walking activity and working from home patterns, as highlighted through the Welsh Government's Building Better Places document. The RLDP seeks to maximise opportunities and further secure this positive transport modal shift, kickstarted by the COVID-19 pandemic, from the car to active travel car-free journeys. Distributing growth based on the settlement hierarchy outlined in Strategic Policy S2 (Spatial Distribution of Development – Settlement Hierarchy) is anticipated to lead to long term positive effects in this respect, enabling the delivery of sustainable and resilient communities.

8.8.11 Strategic Policy S13 (Sustainable Transport) is likely to have the most direct positive effects in relation to transport and movement. The policy establishes a presumption in favour of development which accords with PPW12's Sustainable Transport Hierarchy. Where sites are available to support this approach, this will help embed sustainability and accessibility into new development by integrating walking and cycling and public transport access into the location, design, and layout of new schemes. This principle is supported by other strands of the policy, which seeks to maintain and improve the existing Active Travel Network and promote and prioritise active travel uptake. This links to Policy PROW1 (Public Rights of Way), which seeks to protect the public rights of way network through retaining or relocating contributing routeways and providing new ones where appropriate. It also links to Policy ST5 (Transport Schemes), which seeks to protect active travel schemes in key settlements in Monmouthshire, as well as public transport improvement schemes and road schemes.

8.8.12 Strategic Policy S13 (Sustainable Transport) is underpinned by a number of additional policies. Policy ST1 (Sustainable Transport Proposals) includes the need for development to be accompanied by a Transport Assessment where they are likely to significantly impact upon trip generation and travel demand. This will help to develop a strategy to reduce the need to travel, as well as facilitate, promote, and prioritise active and public transport. This will help reduce the number of vehicles on the highway network and could contribute to reducing occurrences of traffic related issues, such as congestion. The policy also indicates that financial contributions should be made for safety and/ or congestion mitigation measures, or for highway improvements, where appropriate. This will likely include the routes identified in Policy ST2 (Highway Hierarchy). Policy ST3 (Freight) works to reduce the impact of freight on the road network through supporting transfer points between road/ rail/ last mile sustainable transport – which will likely contribute to reducing traffic on the network and reducing congestion at key points. Finally, Policy ST6 (Protection of Redundant Routes) seeks to safeguard former routes (for example, canal and rail routes) that could contribute to future sustainable transport use.

8.8.13 Another strategic policy that is likely to have an effect in relation to the transport and movement ISA theme is Strategic Policy S3 (Sustainable Placemaking and High Quality Design), which indicates that development must minimise the need to travel and maximise opportunities for sustainable transportation. This will help contribute to reducing the number of vehicles on the road. Strategic Policy S4 (Climate Change) includes the need for development to provide ultra-low emission vehicle charging infrastructure where appropriate, which will likely contribute to the transport and movement

ISA theme by helping to reduce combustion engine vehicles on the local road network. This is reiterated in Policy NZ1 (Monmouthshire Net Zero Carbon Homes), and Strategic Policy S8 (Site Allocation Placemaking Principles).

8.8.14 Strategic Policy S8 (Site Allocation Placemaking Principles) also includes stipulations for transport and movement through residential development. This includes prioritising active travel to and from the site, bringing forward improvements to the active and public transportation networks, and maintaining highway safety, capacity, and operation. These stipulations are likely to positively contribute to the transport and movement ISA theme through encouraging uptakes in active and public transportation options and maintaining and enhancing network safety for all users.

8.8.15 Strategic Policy S6 (Infrastructure) also makes provision for transport and movement by ensuring planning agreements and obligations consider the appropriate provision of sustainable transport measures and transport infrastructure. By ensuring development fully considers this, the RLDP is helping to reduce negative impacts on the transport network in Monmouthshire – for example, making sure there is a sufficient level of public transport that is easily accessible will likely contribute to reducing traffic and congestion on the local road network linked to additional cars.

8.8.16 The wider plan policies also have a transport and movement focus. This includes Policy LC4 (Wye Valley National Landscape (AONB)), which indicates development within the designated area will need to consider how it will generate additional traffic and improvements for existing roads and lanes. Furthermore, Policy GT1 (Gypsy, Traveller and Travelling Showpeople) indicates sites will need to have safe and convenient access to the highway network and not cause traffic congestion. Traffic congestion is also a focal point of Policy RE5 (Intensive Livestock / Free Range Poultry Units), which indicates this type of development will be permitted where there are no serious implications on the surrounding highway network. These policies will help to ensure the existing transportation network is not compromised by development contributing additional traffic. Furthermore, Policy T1 (New of Extended Tourism Accommodation and Facilities in the Open Countryside) includes the need for sustainable tourism proposals in the open countryside to prioritise, promote and facilitate sustainable travel opportunities, and include safe and efficient highway design. Again, this contributes to encouraging active and sustainable transportation opportunities over increasing private vehicle usage, which is likely to bring forward positive effects for the transport and movement ISA theme through reduced impacts to the highway network.

Cumulative effects

8.8.17 There is potential for both negative and positive cumulative effects in relation to transport and movement, particularly in relation to cross boundary roads and railways which stand to be impacted by development both within Monmouthshire and regionally.

8.8.18 Existing travel patterns in Monmouthshire reflect its rurality, particularly a trend for relatively long travel to work distances, high levels of car ownership and reliance on the private car. The primary points of road congestion in the

region are on the M4, with the recent South East Wales Transport Commission Final Recommendations Plan (2020) highlighting that "*there is an acute congestion problem on the M4 in South East Wales, particularly on the approach to the Brynglas tunnels. The single biggest cause – by some margin – is the sheer traffic volume at peak times, especially associated with commuting*".[18] The 2019 decision not to progress an M4 relief road[19] circumventing the Newport tunnel bottleneck could have effects in-combination with growth at Monmouthshire, Newport and in the West of England resulting in additional congestion over time. This in turn could increase the duration of car and HGV journeys between south Monmouthshire, Newport, and Cardiff. It is however recognised that the Final Recommendation Plan (2020) sets out a number of recommendations to address the M4 congestion, which may reduce adverse effects in the long term.[20]

8.8.19 There could also be potential for increased traffic along the M4, A4042 and A449 as a result of growth within Newport. Additionally, growth in the Heads of the Valleys, while likely to boost the regional economy, could lead to increased pressure on the road network, particularly the A465. However, it is noted that the A465 has recently undergone significant enhancement, including dualling of the carriageway in places, and capacity has therefore been boosted.

8.8.20 Links to Herefordshire Council and Forest of Dean District Council could also lead to increased congestion in Monmouthshire's key settlements in the south/ east. Notably there is an existing commuter flow of residents from the south of the Forest of Dean along the A48, through Chepstow, and on to the M48 as they seek access to Bristol or Newport and Cardiff. This traffic flow adds to congestion on the A48 and the A466 as it approaches the M48, both of which are trunk roads for these relevant stretches through Monmouthshire. Additional development between Lydney and Chepstow could exacerbate existing traffic issues in Chepstow. It is however recognised that the Forest of Dean Local Plan will likely offer measures which will mitigate the increase in congestion around Chepstow.

8.8.21 Cumulative effects in relation to public transport are projected to be largely positive, as future growth of the Cardiff City Region is underpinning the business case for the SE Metro rollout. This includes enhanced heavy rail connectivity between Cardiff and Abergavenny and Chepstow. In the context of early uncertainties around the extent of the SE Wales Metro rollout, growth proposed in the neighbouring authorities within the Cardiff City Region contribute to this positive cumulative effect through the introduction of additional users of the network to create a robust business case for expansion.

Summary of likely effects

[18] South East Wales Transport Commission (2020) Final recommendations [online] available at: https://gov.wales/sites/default/files/publications/2020-11/south-east-wales-transport-commission-final-recommendations.pdf
[19] Welsh Government (2019) 'M4 corridor around Newport: decision letter' [online], available at: https://gov.wales/m4-corridor-around-newport-decision-letter
[20] South East Wales Transport Commission (2020) Final recommendations [online] available at: https://gov.wales/sites/default/files/publications/2020-11/south-east-wales-transport-commission-final-recommendations.pdf

8.8.22 Considering the above, **significant positive effects** are concluded likely for the transportation and movement ISA theme under the RLDP. This reflects the focus on bringing forward strategic allocations in settlements with a good distribution of services and facilities and transportation infrastructure. Furthermore, there is a focus on prioritising existing public rights of way and active transportation infrastructure and enhancing the network where appropriate. This will likely contribute to reducing the reliance on private vehicles to move around the area and will help support the transportation network in Monmouthshire.

8.9 Natural resources (air, land, minerals, and water)

8.9.1 Whilst air quality is not a significant issue for the County, it is recognised that air pollution is a major cause of death and disease globally[21]. The greatest problems associated with air quality in the County are caused by vehicle emissions; evidenced by the two Air Quality Management Areas (AQMAs) declared at Chepstow and Usk for nitrogen dioxide (NO_2)[22]. Strategic Policy S1 (Growth Strategy) sets out the approach to focus new development on the primary settlements of Abergavenny (including Llanfoist), Chepstow Caldicot (including the Severnside area), and Monmouth (including Wyesham), together with a sustainable amount of growth to the most sustainable lower tier settlements. This is in combination with the outcome of the Sustainable Settlement Appraisal (2021). The Appraisal established a sustainable settlement hierarchy that reflects those communities best placed to accommodate sustainable growth based on accessibility to sustainable transport, the availability of local services and the level of employment opportunities.

8.9.2 Focusing growth towards the most sustainable communities is likely to lead to positive effects in terms of supporting levels of self-containment in the higher tier settlements, reducing the need to travel where possible, and subsequently reducing levels of NO_2. However, as a Tier 1 settlement, Strategic Policy S2 (Spatial Distribution of Development - Settlement Hierarchy) states that around 829 dwellings will be directed to Chepstow during the plan period, which has the potential to exacerbate NO_2 levels within the AQMA through increased road users and subsequent increased levels of congestion. Notably, Chepstow AQMA includes the A48, between the roundabout with the A466, which would likely be utilised by commuters. This includes strategic site allocation Land at Mounton Road, Chepstow (Policy HA3), which is located in the northwest of Chepstow close to the A466.

8.9.3 Conversely, it is noted that Strategic Policy S2 (Spatial Distribution of Development - Settlement Hierarchy) identifies Usk as a secondary settlement (along with Raglan and Penperlleni), with only 350 dwellings distributed between these settlements. The Air Quality Action Plans for both areas contain many transport-related measures, and these have been taken account through the development of the LTP (2016), and subsequently

[21] World Health Organisation (2019) Ambient air pollution: Health impacts https://www.who.int/airpollution/ambient/health-impacts/en/
[22] Air Quality in Wales (2019) Air Quality Management Areas https://airquality.gov.wales/laqm/air-quality-management-areas

through the South East Wales Transport Commission Final Recommendations Plan: November 2020. This will inform the RLDP[23],[24].

8.9.4 It is noted that through Strategic Policy S2 (Spatial Distribution of Development - Settlement Hierarchy), approximately 2,190 homes are to be delivered in the Severnside area. This includes 770 homes at the Land to the East of Caldicot site allocation under Policy HA2. Delivering strategic growth to the South of the County has the potential to lead to positive effects through capitalising upon the strategic links to the Great Western Cities, Cardiff Capital Region, and SW / Bristol region. The Capital Region is committed to a low carbon future, delivering healthier and sustainable travel options, which may provide opportunity for building more sustainable communities and improved air quality in the South of the County. Furthermore, it is recognised that the strategic site allocation will deliver supporting infrastructure alongside housing, which is likely to include active and sustainable travel improvements, supporting self-containment and reduced reliance on the private vehicle.

8.9.5 More broadly, it is considered that the programme outlined in the LTP (2016) will support sustainable communities across the County, including through the delivery of walking and cycling infrastructure, bus network improvements, station and highways improvements, Cardiff Capital Region Metro schemes, 20mph limits and road safety schemes. This coincides with higher level policy frameworks, and in accordance with Welsh Government guidance it does not contain specific rail service and trunk road proposals. It is noted that in 2023 Monmouthshire County Council launched a public consultation on the next draft Local Transport Plan; this closed on the 5th January 2024.

8.9.6 The uptake of sustainable transportation is likely to contribute to reducing air pollution through ensuring active and public transportation opportunities are viable options. This is reiterated through Strategic Policy S13 (Sustainable Transport), which includes the need for "*ensuring development enables transition to Ultra Low Emission Vehicles (ULEVs) by providing necessary underlying infrastructure*". This will contribute positively towards reducing atmospheric levels of NO_2 and improving air quality within Monmouthshire.

8.9.7 The uptake of sustainable travel to improve air quality is further supported through Strategic Policy S2 (Sustainable Placemaking and High Quality Design) and Strategic Policy S6 (Infrastructure); which requires development proposals to "*incorporate an appropriate mix of uses to minimise the need to travel and to maximise opportunities for sustainable transport use*".

8.9.8 Monmouthshire is predominantly rural, and it is therefore acknowledged that the brownfield land resource is particularly limited. In line with Policy S2 (Spatial Distribution of Development - Settlement Hierarchy), the majority of growth is being directed to the Tier 1 Settlements, with the intention of utilising brownfield land where possible. This will contribute positively towards meeting the ISA objective to "…*maximise opportunities for development on previously developed land*".

[23] Monmouthshire County Council (2015) Monmouthshire Local Transport Plan [online] available at: https://www.monmouthshire.gov.uk/local-transport-plan/

[24] South East Wales Transport Commission (2020) South East Wales Transport Commission: Final Recommendations Plan [online] available at: https://gov.wales/south-east-wales-transport-commission-final-recommendations

8.9.9 In terms of specific loss of greenfield land, the spatial strategy performs negatively as a result of strategic site allocations at Abergavenny, Chepstow, Caldicot and Monmouth. Further greenfield loss is expected through allocations under Policies HA5-HA18 – though these areas are likely to be small, cumulatively the greenfield loss is expected to be more significant.

8.9.10 In terms of agricultural land quality throughout Monmouthshire, it is recognised that there is a high percentage of best and most versatile agricultural land (i.e., Grade 1, 2 or 3a). While there is a need to conserve these resources, there are limited opportunities within the County for development on lower grades of agricultural land (i.e., Grade 3b, 4 and 5). The Predictive ALC model for Wales (2017) is based on the principles of the Agricultural Land Classification System of England & Wales, the Revised Guidelines & Criteria for Grading the Quality of Agricultural Land (MAFF 1988). This data model allows you to predict the distribution of BMV land throughout the County, and in relation to key areas as set out in the settlement hierarchy:

- Primary Settlements: these are predominately urban centres, with areas of Grade 3a land located to the east of Abergavenny and integrated between the main urban area throughout Monmouth. Interspersed areas of high-quality Grade 2 land and non-agricultural land are present around Chepstow and Monmouth, as well as Grade 3a land. Severnside is particularly constrained by Grade 2 and Grade 1 land, surrounding the M4. Significantly constrained areas include the entirety of Crick, and large areas within Caerwent, between Rogiet and Magor / Undy, and north of Sudbrook.
- Secondary Settlements: these areas include significant areas of BMV land; areas of Grade 3a land surround Usk (notably to the south). North east / and north west of Penperlleni and north/ north east of Raglan are areas of Grade 3a land. Grade 2 and 3b land is dispersed outside of Raglan's urban area.
- Main and Minor Rural Settlements: these areas are particularly constrained, being located outside of the main settlements where there is a significant amount of BMV agricultural land. This reflects the rural nature of the County. It is noted that the Preferred Strategy does not yet establish where growth may be located in the County's rural areas.

8.9.11 It is considered that directing a significant proportion of growth to the Tier 1 settlements (Strategic Policy S2: Spatial Distribution of Development – Settlement Hierarchy) will protect best and most versatile agricultural land where possible. This is in accordance with PPW12, which states that "*agricultural land of grades 1, 2 and 3a is the best and most versatile and should be conserved as a finite resource for the future*". However, as set out in the RLDP, the widespread distribution of BMV agricultural land (surrounding all settlements to some extent) means that development anywhere in the County will likely lead to residual adverse effects.

8.9.12 The delivery of strategic sites within Abergavenny, Chepstow, Caldicot and Monmouth will likely result in the loss of BMV agricultural land. Based on the Predictive ALC model for Wales (2017), the four strategic site allocations are located on high quality agricultural land, with the site under Policy HA1 (Land

to the East of Abergavenny) located on an area grade 2 / 3a agricultural land, the site under Policy HA2 (Land to the East of Caldicot) being on an area of grade 1 (which is mostly floodplain and would not be developed) surrounded by grade 2. The site under Policy HA3 (Land at Mounton Road, Chepstow) is underlain with grade 3a, and the site under Policy HA4 (Land at Leasbrook, Monmouth) is a mix of grade 2, 3a and 3b. It is noted that every effort will be made to, where possible, protect the higher grades of BMV land; and to avoid / or minimise the loss of BMV land. This will contribute positively towards meeting the ISA objective to promote the efficient use of land.

8.9.13 In terms of the County's mineral resource, the latest South Wales Regional Aggregates Working Party (SWRAWP) Annual Report (2021) establishes that at the end of 2018 Monmouthshire had a greater than 50 year's supply of crushed rock reserves[25]. In view of the surplus of existing permitted crushed rock reserves, no further allocations for crushed rock are required to be identified within the RLDP. A revised Regional Technical Statement (RTS) - 2nd Review was published in 2020. The 2nd Review (RTS2) makes recommendations for the apportionments necessary to ensure an adequate supply of crushed rock, including the nationally recommended minimum provision of 7 and 10 years, are available for the entire duration of the RLDP. The total apportionments required for Monmouthshire are zero for land-won sand & gravel and 5.866 million tonnes for crushed rock. These compare with existing landbanks (excluding dormant sites) of zero for sand & gravel and 11.25 million tonnes for crushed rock (as of 31st December 2016). When compared against the apportioned requirement as set out in the RTS2, Monmouthshire has a surplus of provision and therefore no further allocations for future working are specifically required to be identified within the RLDP when determined on a Local Planning Authority basis.

8.9.14 Whilst it is considered that there would be no negative impact on Monmouthshire's mineral resource through the Preferred Strategy as mineral landbank obligations can be met, the RLDP does have the potential to impact upon the Limestone Mineral Safeguarding Area (MSA) present in parts of the south of the County[26]. Strategic Policy S2 (Spatial Distribution of Development – Settlement Hierarchy) directs around 2,190 dwellings towards the Severnside area in the south of the County, including through the delivery of strategic site allocation under Policy HA2 (Land to the East of Caldicot). As such, development could have an impact on the MSA.

8.9.15 It is considered that in accordance with national and regional policy requirements, a sustainable approach to minerals planning will be adopted. This is evidenced through Strategic Policy S16 (Sustainable Minerals Management) and supporting Policy M1 (Local Building and Walling Stone), Policy M2 (Minerals Safeguarding Areas) and Policy M3 (Mineral Site Buffer Zone), which work to safeguard sensitive mineral deposits by preventing development occurring in certain areas and allowing for the reopening of small-scale quarries for building and walling stone (where appropriate).

[25] South Wales Regional Aggregates Working Party (2024) Annual Report 2021 http://www.swrawp-wales.org.uk/Html/SWRAWP_Annual_Report_2021_Final.pdf
[26] North Wales and South Wales Regional Aggregates Working Parties (2014) Regional Technical Statement - 1st Review https://www.merthyr.gov.uk/media/4451/sd44-south-wales-regional-aggregates-working-party-regional-technical-statement-1st-review-august-2014.pdf

8.9.16 Water is supplied to Monmouthshire by Dwr Cymru/ Welsh Water (DCWW). They supply water via a large scale, multi-source, integrated network that is typical of many other water company areas. Monmouthshire falls within two Water Resource Zones (WRZs); Monmouth and the South East Wales Conjunctive Use System (SEWCUS). The Monmouth WRZ supplies the market town of Monmouth and the surrounding villages. The WRZ is heavily dependent on the Mayhill abstraction from the River Wye at Monmouth. There is also a spring abstraction at Ffynnon Gaer which supplies a small localised area south of Monmouth. The total demand for water for this WRZ is forecast to remain relatively stable until 2030, with a decline in demand anticipated over the 2030-2050 planning period, and then to just 10% of current demands by 2050. The SEWCUS supplies the majority of the County, and a significant proportion of the South East Wales Region. In total, there are over 40 resources that are used to supply the SEWCUS WRZ, which include a mixture of river abstractions from the larger rivers in the east of the WRZ and relatively small upland reservoir sources with small catchment areas. For both WRZs the total demand for water is forecast to remain relatively stable until 2030, with a decline in demand anticipated over the 2030-2050 planning period, and then to just 10% of current demands by 2050.

8.9.17 Water companies are legally required to supply water to private consumers and businesses within their area. As set out in the Water Industry Act 1991, they must prepare and maintain a Water Resources Management Plan (WRMP) that sets out how the company intends to maintain the balance between water supply and demand. Water companies update their WRMPs every five years to take account of predicted growth and ensure that there are schemes in place to meet future demands.

8.9.18 In terms of water quality, following new evidence about the environmental impacts of phosphates in watercourses, Natural Resources Wales (NRW) has adopted tighter targets for river water quality and has assessed the nine riverine Special Areas of Conservation (SAC) in Wales. Within Monmouthshire, it was identified that 88% of the River Usk's water bodies failed to meet the required target and within the River Wye 67% failed to meet the required target. As a result of this failure NRW has issued detailed planning guidance to ensure that the environmental capacity of the rivers does not deteriorate any further. The spatial strategy has regard to this latest position on the phosphates water quality issue and associated requirements to demonstrate neutrality or betterment when proposing development. The strategy has been developed following ongoing discussions with NRW and Dŵr Cymru Welsh Water on future strategic solutions for phosphate mitigation within the river catchment areas.

8.9.19 In accordance with PPW (2024) development coming forward through the RLDP will be encouraged to be water efficient and may deliver mitigation (for example rain water harvesting measures) to support reduced water use per person per day. PPW (2024) states that "*New development should be located and implemented with sustainable provision of water services in mind, using design approaches and techniques which improve water efficiency and minimise adverse impacts on water resources, including the ecology of rivers, wetlands and groundwater and thereby contributing towards ecological resilience*". This is reinforced through Strategic Policy S4

(Climate Change) which requires all development proposals to incorporate water efficiency measures and minimise adverse impacts on water resources and quality. This will contribute positively towards meeting the ISA objective to promote the efficient use of natural resources including providing increased opportunities for water efficiency. The RLDP makes further provisions for water quality through Policy PM2 (Environmental Amenity), which seeks to protect water quality by not allowing development to come forward where there would be a significant risk of / harm to water resources.

Cumulative effects

8.9.20 There is the potential for a cumulative loss of greenfield land and BMV agricultural land as a result of the distribution of housing to meet the need of the wider South Wales region, and neighbouring English authorities. Development proposed through the RLDP has the potential to interact with development proposed through neighbouring authority plans to result in cumulative significant loss of greenfield land and BMV agricultural land.

8.9.21 The County has regional obligations to be met in terms of Minerals planning, forming part of the former Gwent sub-region along with Torfaen, Newport, and Blaenau Gwent. However, when compared against the apportioned requirement as set out in the RTS2, (2020), Monmouthshire has a surplus of provision and therefore no further allocations for future working are specifically required to be identified within the RLDP.

8.9.22 There is the potential for development proposed through the Deposit Plan to interact with development proposed in other plans and programmes to have both a negative and positive cumulative effect on the water environment. More broadly, it is considered that water resources and wastewater treatment capacity are generally managed at a catchment level and there is close working between Natural Resources Wales, Welsh Water, and wastewater service providers to monitor the situation and plan ahead for new infrastructure to meet predicted demands. Given the total demand for water in the County is forecast to remain relatively stable until 2030, with a decline in demand anticipated over the 2030-2050 planning period, and then to just 10% of current demands by 2050, it is considered that the RLDP will not have a significant negative cumulative effect on this ISA theme.

Summary of likely effects

8.9.23 In summary, the plan includes a good level of provision for mineral safeguarding and water quality and works well to reduce impacts on air quality. However, it is noted there is a need to conserve greenfield sites. It is recognised there are limited brownfield opportunities within Monmouthshire, and the plan works well to allocate strategic sites within settlement boundaries and adjacent to built up areas. However, at this time, **significant negative effects** are concluded likely for the impact on natural resources, due to the substantial (and unavoidable) loss of greenfield and agricultural land.

8.10 Biodiversity and geodiversity

8.10.1 In terms of internationally designated sites, it is recognised that the plan area is particularly constrained. HRA screening (November 2022) found that the

following European sites within 15km of Monmouthshire and impact pathways need to be considered in more detail through the Appropriate Assessment (AA) stage:

- Usk Bat Sites SAC (atmospheric pollution, recreation and loss of functionally linked land).
- Cwm Clydach Woodlands SAC (atmospheric pollution).
- Wye Valley Woodlands SAC (atmospheric pollution, recreation).
- Severn Estuary SAC (atmospheric pollution, recreation, water quality and water quantity, level and flow).
- Severn Estuary SPA / Ramsar (atmospheric pollution, recreation, loss of functionally linked land, water quality and water quantity, level and flow).
- River Wye SAC (atmospheric pollution, recreation, water quality and water quantity, level and flow).
- River Usk SAC (recreation, water quality and water quantity, level and flow).
- Wye Valley and Forest of Dean bat Sites SAC (loss of functionally linked land); and
- Sugar Loaf Woodlands SAC (recreation).

8.10.2 The HRA also explored potential impact pathways in relation to the four Preferred Strategic Site Allocations proposed in the RLDP. The HRA found that for all four strategic site allocations, LSEs cannot be excluded, and they were subsequently screened in for AA.

8.10.3 With nutrient neutrality solutions now in place, the HRA AA has subsequently concluded that the RLDP contains a sufficient policy framework, and that no adverse effects would arise on habitat sites alone or in combination with other plans or projects coming forward in Monmouthshire.

8.10.4 The level of development proposed and directed to these areas under Strategic Policies S1 (Growth Strategy) and S2 (Spatial Distribution of Development – Settlement Hierarchy) has the potential to result in impacts on the designated sites and wider biodiversity. Of note, Land to the East of Abergavenny (Policy HA1) has the potential to lead to habitat loss and recreational disturbance of the nearby ancient woodland and habitats present within / surrounding the site. There is also the potential for negative effects through the delivery of Land to the East of Caldicot (Policy HA2), given the presence of the Severn Estuary SPA / SAC / Ramsar site / SSSI within 1.2km of the site, as well as the adjacent ancient woodland at Farthing Hill. It is also recognised that all four strategic sites are greenfield and therefore have the potential to hold biodiversity value. Notably, there are sparse mature trees present throughout Land to the East of Caldicot (Policy HA2) which could be lost or damaged.

8.10.5 It is however considered that development proposals should seek to retain and enhance features where possible, ensuring no net loss, and deliver biodiversity net gain in accordance with national policy. Furthermore, the strategic nature of the sites present an opportunity to exceed the mandatory requirement of 10% net-gain, with the potential for significant long-term

positive effects. This can be achieved through measures outlined in Strategic Policy S8 (Site Allocation Placemaking Principles), including the incorporation of multifunctional streetscapes, retention of green features including trees, and enhancing semi-natural habitats and the ecological connectivity between them.

8.10.6 There are a number of other policies that support or permit a type of development that could have impacts on designated or wider biodiversity interests. This includes Policy CC2 (Renewable Energy Allocation) and Policy CC3 (Renewable Energy Generation), Policy IN1 (Telecommunication, broadband and other digital infrastructure) which supports infrastructure development. This also includes the housing policies H1 to H8, Strategic Policy S9 (Gypsy and Travellers) and Policy GT1 (Gypsy, Traveller and Showpeople Sites), which seek to support housing development. All of these policies have the potential to impact upon biodiversity through potential changes to or losses of habitats, as well as changes to the biodiversity network and associated connectivity.

8.10.7 However, it is recognised that some of the policies that support or permit development have specific biodiversity stipulations. Policy CC3 (Renewable Energy Generation) indicates proposals must not bring forward unacceptable adverse impacts to biodiversity, and environmental benefits directly related to development will need to outweigh any potential negative impacts. Whilst Policy IN1 (Telecommunication, broadband and other digital infrastructure) does not make specific stipulations for biodiversity, the overarching Strategic Policy S6 (Infrastructure) indicates improvements to infrastructure, facilities, services and related works will need to include consideration and appropriate provision of green and blue infrastructure and ecological mitigation and enhancement. This will bring forward benefits for biodiversity by improving connectivity between habitats and designated sites through increased green and blue infrastructure.

8.10.8 Benefits for biodiversity are also anticipated to come forward through Strategic Policy S10 (Employment Site Provision) and Strategic Policy S11 (Rural Economy), which indicate all proposals relating to employment will need to protect the natural environment and ensure no unacceptable harm comes to surrounding biodiversity value. This includes through Policy E2 (Non-Allocated Employment Sites), Policy RE1 (Secondary and Main Rural Settlements Employment Exceptions) and Policy RE6 (Provision of Recreation and Leisure Facilities in the Open Countryside), which allow for employment and recreational development to come forward where no unacceptable harm occurs to the natural environment – which will likely extend to include biodiversity quality and connectivity. Similarly, Policy T1 (New or Extended Tourism Accommodation and Facilities in the Open Countryside) seeks to protect biodiversity through development by ensuring proposals will not cause harm to quality or connectivity, but rather enhance biodiversity and the resilience of ecosystems.

8.10.9 Strategic Policy S5 (Green Infrastructure, Landscape and Nature Recovery) requires development to, "*Maintain, protect and enhance the integrity and connectivity of Monmouthshire's green infrastructure, landscapes, biodiversity, public rights of ways and heritage assets*", through six key functions. This includes "*by protecting, assessing, positively managing and*

enhancing biodiversity and geological interests, including designated and non-designated sites, protected and priority species and their habitats, and the ecological connectivity between them". There is also a key function relating to greenspace provision that states that green infrastructure assets and opportunities are designed to deliver a multifunctional resource. This links to Policy GI1 (Green Infrastructure), which seeks to ensure development proposals maintain, protect and enhance the integrity and diversity of the green infrastructure network across Monmouthshire. It also links to Policy GI2 (Trees, Woodland and Hedgerows), which works to protect these features through development, or replace them where removal or damage is necessary. These policies contribute to biodiversity by protecting networks and features, which helps to strengthen the network.

8.10.10 Furthermore, some of the wider RLDP policies also include a biodiversity focus. Policy OC1 (New built development in the Open Countryside) puts forward a presumption against new built development in the undeveloped countryside of Monmouthshire, and where proposals are put forward, they will only be permitted where they will have no unacceptable adverse impact on biodiversity. This links to Policy GW1 (Green Wedge Designations), which seeks to protect certain green gaps between settlements. These policies work to protect biodiversity by maintaining the existing network in the open countryside, and reducing the potential for negative impacts to occur where development is permitted. Strategic Policy S3 (Sustainable Placemaking and High Quality Design) puts forward the need for development to incorporate a green infrastructure approach – reiterated through supporting Policy PM1 (Creating well-designed places), which encourages the integration of multifunctional green and blue infrastructure with development. These policies will contribute to maintaining and enhancing biodiversity connectivity through protecting existing features that contribute to the network and adding new features to it. Adverse impacts on biodiversity connectivity are resisted through Policy LC5 (Dark Skies and Lighting).

8.10.11 Additionally, Policy NR1 (Nature Recovery and Geodiversity), Policy NR2 (Severn Estuary Recreational Pressure), and Policy NR3 (Protection of Water Sources and the Water Environment) all contribute to maintaining and enhancing biodiversity. This is achieved through protecting designated sites for biodiversity and / or geology and reducing the risk of harm, incorporating mitigation measures where harm cannot be avoided, and delivering benefits for biodiversity and ecosystem resilience.

Cumulative effects

8.10.12 Development proposed through the Deposit Plan has the potential to interact with and have cumulative effects on biodiversity with growth proposed in other areas outside the County. This includes development plans in surrounding authorities, such as Torfaen, Newport, Brecon Beacons National Park, and Herefordshire, and development plans in wider South East Wales and South West England. All of the Local Development Plans include policies which seek to protect and enhance biodiversity.

8.10.13 HRA work has been carried out to address the likelihood for adverse effects on the integrity of any European designated sites as a result of development

proposed through the RLDP acting in-combination with other plans and projects. The candidate site assessment process has also considered the impacts of development at specific sites on biodiversity to inform RLDP policies.

8.10.14 It will be important for Local Planning Authorities and stakeholders, such as NRW and Natural England, to work closely to identify potential cross-boundary issues and seek to protect and enhance ecological corridors that cross authority boundaries where possible. Where possible, any strategic opportunities to deliver biodiversity net gain should be explored.

Summary of likely effects

8.10.15 Considering the above and with nutrient neutrality solutions now in place, **minor positive effects** are considered most likely for the biodiversity and geodiversity ISA theme under the RLDP. This is due to the policy framework avoiding adverse impacts on important sites for biodiversity, and the focus of the plan on bringing forward net gains and improving ecological connectivity.

8.11 Historic environment

8.11.1 Through Strategic Policy S1 (Growth Strategy) and Strategic Policy S2 (Spatial Distribution of Development – Settlement Hierarchy), the majority of growth during the plan period is being directed towards the primary settlements of Abergavenny (including Llanfoist), Caldicot (including the Severnside area), Chepstow, and Monmouth (including Wyesham). There is a range of nationally designated heritage assets located within and around these settlements. Furthermore, the Blaenavon Industrial Landscape World Heritage Site is located to the south west of Abergavenny. The level of development proposed and directed to these settlements under Strategic Policy S1 (Growth Strategy) and Strategic Policy S2 (Spatial Distribution of Development – Settlement Hierarchy) has the potential to result in impacts on the designated heritage assets and wider historic environment within and surrounding these settlements. Given the lack of brownfield sites it is likely that growth will broadly be delivered on greenfield sites.

8.11.2 The RLDP identifies four large scale sites for development at Abergavenny (including Llanfoist), Chepstow, Caldicot (including Severnside area), and Monmouth (including Wyesham). All four strategic sites have been considered through the ISA process. Of particular note in relation to the historic environment is strategic growth proposed under Policy HA2 (Land to the East of Caldicot). Part of the site is located within the Caldicot Conservation Area, containing Caldicot Castle Grade I listed building and Scheduled Monument covering the unoccupied parts. However, it is noted Policy HA2 makes a stipulation for the historic environment – indicating development should consider and respond positively to the setting of the heritage assets and views to the nearby scheduled monument, and that no built development will occur within these sensitive areas. Additionally, the site allocated under Policy HA4 (Land at Leasbrook, Monmouth) is within close proximity to the Dixton Conservation Area – located to the east. Furthermore, the site under Policy HA3 (Land at Mounton Road, Chepstow) is also adjacent to a conservation area – Mathern Conservation Area,

located to the south. In this respect, development is likely to impact the intrinsic qualities, and setting of these heritage assets.

8.11.3 There are a number of other policies that support or permit a type of development that could have impacts on the historic environment. This includes Policy CC2 (Renewable Energy Allocation), which supports the construction of ground mounted solar development at a site within Raglan Enterprise Park, and Strategic Policy S6 (Infrastructure), which details the different requirements that will need to come forward to make development acceptable. Furthermore, Strategic Policy S9 (Gypsy and Travellers) and Policy GT1 (Gypsy, Traveller and Showpeople Sites) allocates a site at Bradbury Farm, Crick for seven pitches to meet Gypsy and Traveller accommodation needs and supports proposals for further sites subject to meeting outlined criteria. Furthermore, Strategic Policy S10 (Employment Site Provision) seeks to allocate 57 hectares of employment land to meet a minimum requirement of 38 hectares, at new sites put forward through Policy EA1 (Employment Allocations) and non-allocated sites under Policy E2 (Non-Allocated Employment Sites). This links to Strategic Policy S11 (Rural Economy), which enables rural enterprise uses outside settlement boundaries, and Strategic Policy S12 (Visitor Economy) – which supports development proposals that contribute to the visitor economy and sustainable tourism. Finally, Strategic Policy S15 (Community and Recreation Facilities, Public Open Spaces and Areas of Amenity Importance) seeks to bring forward enhanced community and recreation facilities within or adjoining settlement boundaries – supported by Policy CI2 (Provision of Outdoor Recreation Facilities, Open Space and Allotments / Community Growing Areas). All of these policies could impact upon the historic environment through changes to the setting of heritage features, or changes to views to/ from heritage structures, thus changing how they are interpreted.

8.11.4 However, Policy OC1 (New built development in the Open Countryside) contributes to reducing the potential for negative impacts on the historic environment and heritage assets in Monmouthshire by bringing forward a presumption against new built development in the open countryside. This will help to limit development coming forward outside of settlement boundaries, thus helping to protect the integrity of the wider historic landscape. Furthermore, Policy OC1 (New built development in the Open Countryside) indicates proposals for new development in the open countryside will only be permitted where it will have no unacceptable adverse impact on historic, cultural, or geographical heritage. Again, this policy works to protect the historic environment of Monmouthshire by ensuring features and qualities are maintained and protected.

8.11.5 The RLDP includes policies that will help to reduce the impact of proposed development on the historic environment. This includes Strategic Policy S3 (Sustainable Placemaking & High Quality Design) which requires development to "*contribute to creating high quality, attractive and sustainable places that support the health and well-being of the community*". To achieve this development should, "*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*".

8.11.6 This is supported by Policy PM1 (Creating well-designed places), which indicates development proposals will need to meet a number of criteria. This includes respecting the existing development design (including form, materials, and layout), contributing to a sense of place, and respecting and enhancing local distinctiveness – particularly where historical features are present. This will help ensure new development is reflective of and positively contributes towards the existing built environment. It is also supported by Policy PM2 (Environmental Amenity), which indicates development that would cause significant harm to built heritage through increased pollution (for example, air and light) will not be permitted unless measures are incorporated to overcome potential risks. Furthermore, Strategic Policy S3 is supported by Policy HE1 (Conservation Areas) and Policy HE2 (Design of Shop Fronts in Conservation Areas) which seeks to preserve and enhance the character and appearance of Conservation Areas and their settings through new development. This links to Policy PM3 (Advertisements), which stipulates advertisements in Conservation Areas will be permitted where they would not detract from the character or appearance of the area. It is also supported by Policy HE3 (Roman Town of Caerwent), which ensures development protects the integrity of archaeological remains and the character of the associated Conservation Area. As such, these policies positively contribute to the protection of heritage features and the wider historic environment through seeking reflective and considerate development.

8.11.7 Furthermore, Strategic Policy S5 (Green Infrastructure, Landscape and Nature Recovery) states that development proposals must, "*Maintain, protect and enhance the integrity and connectivity of Monmouthshire's green infrastructure, landscape, biodiversity, public rights of ways and heritage assets*" through "*Landscape Setting and Quality of Place, by 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*". This will contribute to a maintained wider historic landscape. This policy is supported by Policy GI1 (Green Infrastructure) and Policy GI2 (Trees, Woodland and Hedgerows), which seek to maintain and enhance green features (including those that are of cultural heritage), which will safeguard and contribute additional features that influence the setting of historic features. As such, the green infrastructure policies work well to maintain heritage features and enhance the historic environment in Monmouthshire.

8.11.8 Policy LC1 (Landscape Character) also supports Strategic Policy S5 through ensuring development does not have an unacceptable adverse effect on the historic character or quality of Monmouthshire's landscape – including changes to the character of the built landscape. The heritage importance of Blaenavon Industrial Landscape World Heritage Site is protected through Policy LC2 (Blaenavon Industrial Landscape World Heritage Site), which works to protect the setting and character of the designation, as well as significant views into and out of the area. Heritage considerations are also included in Policy LC3 (Bannau Brycheiniog National Park), which protects the setting of the designation and significant views and Policy LC4 (Wye Valley National Landscape (AONB)), which stipulates development will need to be in harmony with the built heritage of the designated area. These work to maintain the character of the historic environment in Monmouthshire.

8.11.9 It is recognised that some of the policies that support or permit development have specific heritage stipulations. This includes Policy IN1 (Telecommunication, broadband and other digital infrastructure), which indicates these types of development proposals will be considered and permitted where they would not bring forward significant adverse impacts to the historic environment or built heritage. Strategic Policy S10 (Employment Site Provision), which requires all proposals to be subjected to detailed planning considerations – including the protection of the built environment. This will likely extend to the historic environment as demonstrated by supporting Policy E2 (Non-Allocated Employment Sites), which indicates proposals for industrial and business development will be supported where proposals would not cause harm to historical or cultural heritage. Similarly, Strategic Policy S11 (Rural Economy) indicates development to enable rural enterprise will need to not cause unacceptable harm to surrounding historic and cultural heritage. This is reflected in supporting Policy RE1 (Secondary and Main Rural Settlements Employment Exceptions), which indicates small-scale industrial and business development will be supported where it would not cause unacceptable harm to the built environment – which will likely extend to include heritage features. Furthermore, under Policy T1 (New or Extended Tourism Accommodation and Facilities in the Open Countryside), any sustainable tourism proposals in the open countryside will need to protect, maintain, and enhance the historic environment. Additionally, Policy CC3 (Renewable Energy Generation) indicates renewable and low carbon development proposals will be permitted where there is no unacceptable impact upon historic features. These policies work to support the historic environment by ensuring heritage assets and their settings are not harmed through development.

8.11.10 The future well-being of the Welsh language the RLDP is dependent on a range of factors beyond the planning system, particularly education, demographic change, community activities, and a sound economic base to maintain thriving sustainable communities. The RLDP will deliver new homes and employment opportunities as well as associated infrastructure improvements. As most growth is directed to the principal settlement areas, effectively integrated new housing and employment development can support cultural vitality and inclusive communities. This is likely to have a long term indirect positive effect on the future of the Welsh language; however, this is unlikely to be significant.

Cumulative effects

8.11.11 Development proposed through the Deposit Plan has the potential to interact with development proposed through other plans to have a cumulative effect on the historic environment. Interactions of greatest significance are likely to be those plans, programmes and projects that impact upon the Blaenavon Industrial Landscape World Heritage Site (WHS), as well as historic town centres.

8.11.12 The WHS lies across the County Boundary and also forms part of the County Borough of Torfaen. The south-western boundary of the WHS runs parallel with the boundary of Torfaen/ Blaenau Gwent County Borough's also. Growth proposed through the RLDP alongside growth proposed through the emerging spatial strategies for the Torfaen and Blaenau Gwent

LDPs has the potential to cumulatively affect the sensitive historic site and its setting. It is recognised however, that all of the Local Development Plans will include policies which seek to protect and enhance the historic environment.

8.11.13 The WHS Management Plan seeks to "*deliver well-being benefits through heritage management and heritage-led regeneration*". The document identifies that Blaenavon has enjoyed successful heritage-led urban and environmental regeneration which has benefitted the historic landscape delivering substantial improvements and promoting continued inward investment. In this respect, growth around the WHS has the potential to support regeneration and townscape improvements that continue to protect and enhance the designated area and the wider setting.

8.11.14 It will be important for Local Planning Authorities and stakeholders, such as Cadw, to work closely to identify potential cross-boundary issues and seek to protect and enhance heritage settings that cross authority boundaries where possible. Where possible, any strategic opportunities to deliver heritage-led regeneration, in line with the WHS Management Plan, should be explored.

Summary of likely effects

8.11.15 At this time, **minor negative effects** are concluded most likely under the RLDP for this ISA theme. This reflects the proximity of site allocations to heritage features, and their potential to impact upon the historic environment where the design and layout of development will be crucial to minimise negative effects, as guided by the Deposit Plan policies. There are also notable policy provisions included under the RLDP, which will directly and indirectly benefit the historic environment by protecting specific features and enhancing the wider setting they are located within.

8.12 Landscape

8.12.1 Monmouthshire has a rich and diverse landscape stretching from the coastline of the Gwent Levels in the south of the County, to the uplands of the Brecon Beacons in the north, and the river corridor of the Wye Valley in the east. In terms of nationally designated landscapes, the County includes:

- Wye Valley National Landscape (previously Area of Outstanding Natural Beauty, or AONB) located to the east of Monmouthshire. The part of the Wye Valley National landscape located within Monmouthshire covers approximately 16% of the Monmouthshire LDP area.
- Brecon Beacons National Park located to the north west of Monmouthshire. The portion of the Brecon Beacons National Park (BBNP) located in Monmouthshire covers approximately 17% of the County.

8.12.2 In line with Planning Policy Wales (2024) it is recognised that the Wye Valley National Landscape and Brecon Beacons National Park are "*valued for their intrinsic contribution to a sense of place, and that their special characteristics should be protected and enhanced*". In addition to national policy requirements, protection is also provided to the Wye Valley through the Wye Valley AONB Management Plan (2021), which sets out five Development Strategic Objectives, underpinning the aim to "*Ensure all development within*

the AONB and its setting conserves and enhances the AONB"[27]. Notably, Objective WV-D2 seeks to "*encourage and support high standards of design, materials, energy efficiency, drainage, landscaping, and Green Infrastructure in all developments*".

8.12.3 In terms of the Brecon Beacons National Park, there is an established Local Development Plan (LDP) in place and development control functions in the correlating part of the County. The LDP "*represents and defines the National Park Authority's approach for ensuring sustainable development is carried out in the National Park*". Additionally, 'Y Bannau The Future' The Management Plan for the Brecon Beacons 2023 – 2028 sets out under even cross-cutting themes, policies, and priorities for managing change in the National Park. Notably, 'Place Planning' helps to deliver high quality integrated sustainable development within the National Park.

8.12.4 While protection is provided at the higher level, it is nonetheless considered that development proposed through the RLDP has the potential to adversely impact upon special landscape features, character, and setting.

8.12.5 Strategic Policy S1 (Growth Strategy) states that the LDP will make provision for up to 6,210 homes over the plan period. However, the residual housing requirement during the plan period is less than this once existing commitments have been taking into account.

8.12.6 The growth strategy seeks to distribute growth across the County in a manner that reflects the findings of the Sustainable Settlement Appraisal. This is demonstrated through Strategic Policy S2 (Spatial Distribution of Development – Settlement Hierarchy). It will focus growth to the primary settlements of Abergavenny (including Llanfoist), Chepstow and Caldicot (including the Severnside area), and Monmouth (including Wyesham), together with a sustainable amount of growth to the most sustainable lower tier settlements, including, a small amount of development in the most sustainable Rural Settlements to bring forward affordable housing. It is noted that the RLDP has a presumption against new built development in the open countryside unless justified under national planning policy (Policy OC1 New Built Development in the Open Countryside). This will likely include the avoidance of new development within designated green wedges that contribute to keeping settlements separate (Policy GW1 Green Wedge Designations), thus contributing to the protection of undeveloped landscapes in Monmouthshire.

8.12.7 It is noted that the conversion / rehabilitation of buildings within the open countryside is supported under Policy H4 (Conversion / Rehabilitation of Buildings in the Open Countryside for Residential Use) where development is respectful of the landscape. This includes how the structure is designed (for example, the form and materials used), and how it is accessed – especially if located within the Wye Valley National Landscape. Linked to this, the replacement of existing dwellings in the countryside will be permitted as per Policy H5 (Replacement Dwellings in the Open Countryside), so long as the original structure is not important to the visual and intrinsic character of the landscape, and the replacement is designed to be considerate of the setting. Similarly, the extension of rural dwellings in

[27] Note the Management Plan has not been updated to reflect the change to National Landscape from AONB.

the open countryside should be modest and should respect and enhance the existing structure (Policy H6 Extension of Rural Dwellings). This will help ensure development contributes to the landscape character and quality.

8.12.8 Looking specifically at the strategic policies, in accordance with Strategic Policy S2 (Spatial Distribution of Development – Settlement Hierarchy) around 1,362 homes, including strategic site allocation Land to the East of Abergavenny (Policy HA1 - which will deliver 500 homes within the plan period), will be directed to Abergavenny. Whilst the settlement is adjacent to the National Park, the strategic site is a distance from the designation – located within the settlement boundary to the east. 829 homes, including the strategic site allocation Policy HA3 (Land at Mounton Road, Chepstow – which will deliver 146 homes) are directed to Chepstow, which is located adjacent to the Wye Valley National Landscape. The site allocation is within proximity to the designated area and as such development could impact upon the setting of the landscape. The same can be said of the strategic site allocation under Policy HA4 (Land at Leasbrook, Monmouth) which seeks to bring forward development within close proximity to the Wye Valley National Landscape.

8.12.9 As a result, focussing a significant proportion of development in the Primary Settlements has the potential to increase pressure on landscape character, setting, and the intrinsic qualities of the Wye Valley National Landscape and Brecon Beacons National Park. All strategic site allocations are expected to demonstrate how the proposal has been informed by surrounding landscape character, qualities, and sensitivities, under Strategic Policy S8 (Site Allocation Placemaking Principles).

8.12.10 Consideration is also given to the impact of the RLDP on the wider valued landscape; recognising that Cadw, Natural Resources Wales and the International Council on Monuments and Sites (ICOMOS UK) has compiled a non-statutory Register of 58 landscapes of outstanding or special historic interest in Wales. Notably there are four located within Monmouthshire. These mainly relate to the National Landscape along the east of the County, along the Severn Estuary to the south, and to the west coinciding with the Brecon Beacons National Park.

8.12.11 It is considered that directing a significant proportion of growth towards important designated landscapes will ultimately change the landscape setting of these assets to some degree, with both positive and negative effects anticipated. Negative effects are ultimately anticipated due to a loss of greenfield and agricultural land through strategic development sites at Abergavenny and Chepstow. The delivery of these sites is likely to affect local landscape character, with development at Chepstow also considered likely to affect views from the National Landscape given the rural nature and topography of the County. More broadly, effects are likely to be more significant in relation to Land to the East of Abergavenny (Policy HA1), given the scale of growth proposed and the categorisation of the site as being of ‘a high to medium landscape sensitivity’ in relation to residential development[28]. The same can be said of the site under Policy HA4 (Land at Leasbrook, Monmouth). Land at Mounton Road, Chepstow (Policy HA3) is categorised as being of ‘medium landscape sensitivity’. The site allocated under Policy

[28] Monmouthshire Landscape Capacity Update 2020

HA2 (Land to the East of Caldicot) is a mix of both 'high to medium landscape sensitivity' and 'medium landscape sensitivity' in relation to residential development.

8.12.12 It is considered that potential negative effects and potential positive effects are dependent upon the delivery of high-quality design and efficient layout.

8.12.13 To this effect, Strategic Policy S3 (Sustainable Placemaking and High Quality Design) requires that "*development will contribute to creating high quality, attractive and sustainable places that support the well-being of the community*". In particular, this policy is supported by Policy PM1 (Creating well-designed places), which seeks to ensure high-quality sustainable design respects the character and distinctiveness of the built, historic and natural environment of Monmouthshire. This is also supported by Policy PM2 (Environmental Amenity), which indicates development proposals that would cause a significant risk or harm to local character and quality of the countryside and landscape through pollution (for example, noise and light pollution) will not be permitted unless the risk can be overcome through design measures.

8.12.14 PPW places the delivery of sustainable places which are attractive, sociable, accessible, active, secure, welcoming, healthy, and friendly at the heart of the Plan and notes it as the optimal outcome of development plans. Notably, PPW12 defines Green Infrastructure as "*the network of natural and semi-natural features, green spaces, rivers and lakes that intersperse and connect places*". The importance of protecting and enhancing Green Infrastructure is a key policy theme within PPW, recognising the multi-functional role it has in delivering the goals and objectives of the Future Generations and Wellbeing Act.

8.12.15 The RLDP supports a green infrastructure led approach to the design of new development that will enhance the character and identity of Monmouthshire's settlements and countryside, encourage sustainable lifestyles and create attractive, safe and accessible places. It is however recognised that the achievement of this will depend largely upon identifying and understanding the local characteristics which are distinctive to an area. To ensure this is delivered, Strategic Policy S5 (Green Infrastructure, Landscape and Nature Conservation) requires that development proposals maintain, protect, and enhance the integrity and connectivity of Monmouthshire's green infrastructure, landscapes, biodiversity, public rights of ways and assets through a number of key functions, including greenspace provision and connectivity, sustainable energy use, and landscape setting and quality of place. This policy is supported by several policies concerned with maintaining, protecting and enhancing the green infrastructure network (Policy GI1 Green Infrastructure) and specific green features (Policy GI2 Trees, Woodland and Hedgerows) and the character contribution of dark skies (Policy LC5 Dark Skies and Lighting).

8.12.16 Policy LC1 (Landscape Character) is concerned with protecting the landscape character of Monmouthshire and requires landscape assessments to be undertaken for development proposals that would impact upon landscape character. This contributes to ensuring landscape character and quality is maintained. There are several supporting policies that seek to protect important landscape areas, such as the Blaenavon Industrial

Landscape World Heritage Site (Policy LC2), the Bannau Brycheiniog National Park (Policy LC3), and the Wye Valley National Landscape (Policy LC4). These will all contribute positively towards meeting the RLDP objective to "*protect, enhance and manage Monmouthshire's natural environment. This includes, the Wye Valley National Landscape (AONB), the County's other high quality and distinctive landscapes, protected sites, protected species and other biodiversity interests".* In this context, in accordance with Strategic Policy S6 (Infrastructure) development may be required to include "*Recreation and Leisure Facilities including formal and informal open space*", and / or "*Green Infrastructure*" alongside development, to make development acceptable.

8.12.17 The wider RLDP policies make provisions for landscape. Strategic Policy S11 (Rural Economy) allows for diversification of the rural economy outside of defined settlement boundaries where it is of a style and type compatible with the surrounding area and will not bring forward unacceptable harm to the landscape. This is supported by Policy RE1 (Secondary and Main Rural Settlements Employment Exceptions) Policy RE2 (The Conversion or Rehabilitation of Buildings in the Open Countryside for Employment Use), and Policy RE6 (Provision of Recreation and Leisure Facilities in the Open Countryside). The same can be said of Strategic Policy S12 (Visitor Economy), which indicates development proposals will be supported where they would not have an adverse impact on the landscape character of key features and areas of tourism interest. This works to protect the landscape by ensuring development integrates well with its surroundings. This policy is supported by Policy T1 (New or Extended Tourism Accommodation and Facilities in the Open Countryside)

8.12.18 Policy CC3 (Renewable Energy Generation) also makes provisions for landscape – indicating that renewable and low carbon development will be permitted where there are no unacceptable adverse impacts upon the landscape or its character. This would likely include visual impacts to important views, which is also a key consideration for Policy IN1 (Telecommunication, broadband and other digital infrastructure), which indicates infrastructure will need to minimise impact on the visual amenity and should pay particular care to the National Landscape and National Park designations.

8.12.19 Furthermore, sites for Gypsy, Traveller and Travelling Showpeople communities will be permitted where the land does not occupy a prominent location and is in line with RLDP policies for protecting and enhancing the character of the landscape. Under Policy GT1 (Gypsy, Traveller and Showpeople Sites), where sites have the potential to bring forward negative impacts to the landscape, mitigating measures will need to be incorporated to reduce the impacts. This will help to protect the landscape character and important views.

8.12.20 In terms of employment sites, Policy E2 (Non-Allocated Employment Sites) indicates proposals for industrial and business development will be supported where the proposed site is within or adjacent to settlement boundaries or existing and proposed employment sites. This will help to reduce potential landscape issues by bringing forward growth in areas that already experience a level of development, which will contribute to reducing

visual impacts. Further to this, Policy E2 also indicates proposals would need to cause no harm to surrounding landscape value – further protecting landscape character and quality.

Cumulative effects

8.12.21 Development proposed through the Deposit Plan has the potential to interact with and have cumulative effects on landscape with growth proposed in other areas outside the County. This includes development plans in surrounding authorities, such as Torfaen, Newport, Brecon Beacons National Park, Forest of Dean and Herefordshire, and development plans in wider South East Wales and South West England. All of the Local Development Plans include policies which seek to protect and enhance the landscape.

8.12.22 Development proposed through the RLDP has the potential to interact with development proposed through these other plans to have a cumulative effect on the landscape. Interactions of greatest significance are likely to be those plans, programmes and projects that impact upon the Wye Valley National Landscape (AONB) and Brecon Beacons National Park, given their importance nationally.

8.12.23 When considering cumulative effects of development on the National Landscape, consideration should be given to the protections provided by the adopted Wye Valley AONB Management Plan (2021). In addition to national policy requirements, the AONB Management Plan sets out Strategic Development Objectives, which aim to "*Ensure all development within the AONB and its setting conserves and enhances the AONB*".

8.12.24 In terms of the National Park, consideration should be given to the protections provided by the BBNP Management Plan (2021). In addition to national policy requirements, the Management Plan sets out under numerous themes, policies, and priorities for managing change in the National Park. Notably, 'Place Planning', helps to deliver high quality integrated sustainable development within the National Park.

8.12.25 Ultimately the nature and significance of effects will be dependent on the design / layout of development and the implementation of mitigation measures. It will be important for Local Planning Authorities to work closely with each other as well as Natural Resources Wales / Natural England and the Wye Valley AONB Partnership, to try and plan at a landscape scale, minimise potential impacts as well as identify opportunities to deliver improvements where possible, including the delivery of new valued landscapes.

Summary of likely effects

8.12.26 At this time, **minor negative effects** are considered most likely in relation to the landscape ISA theme. Whilst development will impact upon landscape character and quality in Monmouthshire, the RLDP works well to reduce this impact by allocating sites within settlement boundaries and outside of landscape designations. Furthermore, the development policies and wider policy provisions under the RLDP work to maintain and enhance landscape character and quality – for example, through green infrastructure provision

and resisting development in the open countryside. Despite this, considerable greenfield loss will impact the landscape cumulatively.

8.13 Climate change (including flood risk)

8.13.1 The Climate Change ISA objectives are to both mitigate and adapt to the effects of climate change through increasing energy efficiency and using low carbon and renewable energy sources where possible. Adapting to the effects of climate change includes the need to adapt to increased flood risk, whilst a key focus of mitigating climate change is the need to reduce CO_2 emissions from the built environment.

8.13.2 The distribution of growth proposed under Strategic Policy S1 (Growth Strategy) and Strategic Policy S2 (Spatial Distribution of Development – Settlement Hierarchy) has potential to perform either positively or negatively in relation to climate change adaptation as the strategy is not supported by a bottom-up understanding of specific sites. However, there is a broad understanding of the direction of growth, including four strategic sites directed to the main settlements of Abergavenny (including Llanfoist), Chepstow, Caldicot (including Severnside), and Monmouth (including Wyesham). Nonetheless, this means that detailed conclusions are challenging as flood risk varies within settlements. For example, the growth directs a significant proportion of growth to Abergavenny – and the settlement has substantial areas of Flood Zone C2, i.e., the area at greatest risk of fluvial flooding. However, it is recognised that the strategic site allocation under Policy HA1 (Land to the East of Abergavenny) is outside of the areas of C2 fluvial flood risk. Furthermore, higher tier policy is likely to ensure that areas of high flood risk are avoided through the development process. This is reiterated by MCC.

8.13.3 In terms of the other strategic site allocations, the site under Policy HA3 (Land at Mounton Road, Chepstow) is not constrained by flood risk. There is however an isolated area in the north half of the site at high risk of flooding from surface water. It is recognised that the site has potential to support adaptation to the potential effects of climate change by utilising sustainable drainage systems (SuDS) and providing improvements to the local green infrastructure network. Development is also likely to be directed away from these areas of high flood risk in line with higher tier planning policy and guidance via the PPW and Technical Advice Note 15.

8.13.4 The Land to the East of Caldicot (Policy HA2) is constrained by fluvial flood risk along its western boundary. As above, it is considered that the design and layout of development alongside the use of suitable mitigation methods will minimise the potential residual effects, in line with higher level planning policy – especially given the policy indicates no built development will be permitted within the part of the site that is within the floodplain.

8.13.5 Much of Monmouth is also at risk of flooding, linked to the River Wye and River Monnow flowing through the settlement. Whilst areas of the settlement are within areas of C1 and C2 flood risk, the strategic site under Policy HA4 (Land at Leasbrook, Monmouth) is largely removed from this higher risk. There is a small area of the site in the southern extent that is within zone C2 – though it is anticipated this risk could be avoided or mitigated through development by focusing growth elsewhere in the site or incorporating flood

management techniques (like SuDS). Furthermore, the policy also includes the requirement for emergency vehicular access to be provided to connect the site to the A466 to allow for greater access in the case of an extreme flooding event. This contributes well to mitigating the flood risk on the site.

8.13.6 In terms of climate change mitigation, the growth strategy has a mixed performance. Notably, there is the potential to reduce greenhouse gas emissions by focusing growth at the higher tier settlements with existing transport links. By directing of the majority of growth to Tier 1 settlements, including through the allocation of strategic sites, the strategy ensures that new development will be at locations with the strongest public transport links to other regional employment hubs, particularly Cardiff, Newport, Bristol and the Wider SW Region. Similarly, new employment growth in the Tier 1 settlements will be accessible by train.

8.13.7 In terms of the strategic site allocations, it is considered that larger sites will be supported by a level of transport infrastructure / active travel improvements. This is likely to support self-containment, reducing the need to travel and in turn contributing positively towards climate change mitigation objectives. While there is uncertainty at this stage in terms of the specific infrastructure to be provided, positive effects of greatest significance are considered in relation to Policy HA2 (Land to the East of Caldicot), given the level of growth proposed, followed by Policy HA1 (Land to the East of Abergavenny).

8.13.8 The Active Travel (Wales) Act (2013) requires all local authorities in Wales to deliver improvements to their network of active travel routes and facilities. Monmouthshire's Active Travel Network includes walking and cycling paths within each of the principal settlements though inter-settlement connectivity is limited outside of the Severnside settlements (which are close enough for active travel to be a viable option, though this may be partly on-road). In this context new development through the growth strategy performs well at a localised scale, offering good potential for new development to link with and enhance the existing network within settlements. However, the rural nature of the County and the distances between most of the higher tier settlements mean that growth is unlikely to have a positive effect in terms of climate change mitigation in relation to the majority of inter-settlement travel.

8.13.9 The trend of increased home and remote working in light of the COVID-19 pandemic is anticipated to continue over the longer term. In accordance with Welsh Government's ambition of 30% of people working from or near home, the RLDP supports new development where it meets infrastructure requirements, including broadband provision. This, amongst other requirements, will contribute positively towards reducing out-commuting and supporting the Council's climate change objectives by reducing the overall need to travel.

8.13.10 In 2018 the proportion of CO_2 emissions in Monmouthshire from the built environment, i.e., from both domestic and industrial / commercial sources, was 50% which is notably low in relation to the Wales average of 74%. However, this is likely to simply reflect that the County has a higher-than-average proportion of emissions from transport sources, rather than reflecting low built environment emissions per se. While it is considered that the growth strategy is delivering relatively low growth in absolute terms,

strategic growth proposed at strategic site allocation under Policy HA2 (Land to the East of Caldicot) is considered of scale to facilitate opportunities for delivering decentralised heat / power generation from renewable or low carbon sources.

8.13.11 More broadly it is considered unlikely that the distribution of growth will appreciably reduce emissions from the built environment.

8.13.12 Strategic Policy S4 (Climate Change) could lead to positive effects in relation to climate change adaptation and climate change mitigation. The policy has a strong emphasis on the need to embed low carbon concepts into development, saying that all development proposals will be required to incorporate "*low / zero carbon energy requirements by reducing energy demand and promoting energy efficiency*", utilise "*sustainable construction techniques and local supplies through the adoption of circular economy techniques*" and provide "*ultra-low emission vehicle charging infrastructure to reduce emissions*". The policy also requires all development to avoid "*areas at risk of flooding*" and to incorporate "*measures such as Sustainable Urban Drainage Systems and flood resilient design*".

8.13.13 Strategic Policy S4 is supplemented by four additional policies related to the Climate Change theme. These policies set out standards for all new build residential development to follow to ensure houses are built to the highest energy efficiency standards (Policy NZ1 Monmouthshire Zero Carbon Homes), and incorporate sustainable urban drainage systems where appropriate (Policy CC1 Sustainable Drainage Systems). The policies also identify a renewable energy opportunity at Raglan Enterprise Park for ground mounted solar development (Policy CC2 Renewable Energy Allocation), and further renewable and low carbon development which contribute to national and local targets are supported through Policy CC3 Renewable Energy Generation. As such, they perform positively, compliment Strategic Policy S4 (Climate Change), and contribute well to climate change mitigation and adaptation.

8.13.14 It is considered that wider policies will also contribute to climate change adaptation and mitigation effects. For example, Strategic Policy S5 (Green Infrastructure, Landscape and Nature Recovery) and its supporting polices GI1 (Green Infrastructure) and GI2 (Trees, Woodland and Hedgerows) work to maintain, protect and enhance green infrastructure in Monmouthshire. Protecting green features will maintain contributions to carbon capture and storage, and maintain natural flood risk contributions (linked to water interception). Furthermore, Strategic Policy S13 (Sustainable Transport) and its supporting policies (in particular Policy ST1 Sustainable Transport Proposals, as well as Policy PROW1 Public Rights of Way) will help contribute to climate change mitigation through reducing emissions linked to transportation. This will be achieved through promoting and prioritising active travel and public transport over private vehicular transport, thus reducing the number of vehicles on the road.

8.13.15 Additionally, Strategic Policy S3 (Sustainable Placemaking and High Quality Design) will contribute to climate change adaptation and mitigation. This is due to its focus on incorporating a green infrastructure-led approach and minimising the need to travel, and promoting sustainable transportation. This will reduce the number of vehicles on the road, and increase carbon

capture and storage levels. Policy GT1 (Gypsy, Traveller and Showpeople Sites) outlines the need for accommodation sites to be removed from areas at high risk of flooding – thus reducing the potential for flood impacts on structures. Finally, the identification of new employment sites under Policy EA1 (Employment Allocations), and the protection of existing sites under Policy EA2 (Protected Employment Sites) will likely reduce the need to travel out of settlements to access work opportunities, which will contribute to reducing emissions linked to transportation.

Cumulative effects

8.13.16 In terms of climate change adaptation there does not appear to be notable potential for negative cumulative effects from development in Monmouthshire in combination with development in neighbouring plan areas. Although significant areas of fluvial flood risk permeate the County, in alignment with the major watercourses which flow to the Severn estuary to the south, there is a presumption in PPW against development in Flood Zone C2, the highest risk zone. This is augmented by the revised draft Technical Advice Note 15 (TAN15) which emphases that "*'In Zone 3 (Rivers and Sea), allocations for residential and other highly vulnerable development must not be made as the risks and consequences of flooding are not considered acceptable for these types of development."* This will help ensure that development in Monmouthshire will be part of a regional and national picture of development which is directed away from areas at high risk. In this sense effects from the Deposit Plan in combination with surrounding authorities are likely to be neutral.

8.13.17 Additionally, the PPW presumption against such development is likely to ensure that development upstream from Monmouthshire in neighbouring authorities will be directed away from high-risk areas, thereby minimising interference in the natural flow of watercourses through the County. The Deposit Plan does not direct development to locations which could have impacts further downstream in neighbouring plan areas. For example, in the context of PPW and TAN15 development at Usk will be unlikely to be of a scale or at sites which could impact the River Usk downstream as it flows through Newport.

8.13.18 In terms of climate change mitigation there is greater potential for cumulative effects. As noted in the discussions of air quality and of transport, positive effects are anticipated from proposed expansion of the SE Metro throughout the Cardiff Capital Region, including in Monmouthshire. This includes enhanced rail connectivity between Cardiff and Abergavenny and Chepstow, and bus rapid transit between Cardiff and Monmouth. This will likely contribute to a modal shift away from high emitting transport modes towards sustainable travel. However, regional growth along major road arteries, such as growth in Newport along the M4 corridor and growth in Blaenau Gwent along the A465 corridor, could introduce additional road users as well.

8.13.19 The Cardiff Capital Region City Deal states an ambition for the ten authorities in the Cardiff Capital Region to come together to deliver strategic solutions for the region, including in relation to renewable energy. The City Deal identifies that regional development will present opportunities to deliver "*renewable energy-led regeneration and housing programmes*". In this

context there is theoretical potential for positive in-combination effects, particularly as larger-scale development can give rise to opportunities to minimise per capita emissions from the built environment over-and-above a strategy involving dispersal of housing growth across smaller sites. It is recognised that development proposed through the adopted plans of the Brecon Beacons National Park, Forest of Dean, and Herefordshire could demonstrate particular locational/ site specific opportunities in respect of minimising per capita built environment and transport emissions.

8.13.20 There could also be potential to explore strategic low-carbon opportunities from development in the south of Monmouthshire in combination with the strategic Eastern Expansion Area in Newport.

Summary of likely effects

8.13.21 At this time, **neutral effects** are considered most likely in relation to climate change adaptation. This reflects the allocation of strategic sites at little to no risk of flooding. This conclusion is also based on the policy provisions of the RLDP, including those under Strategic Policy S4 (Climate Change), which seek to reduce flood risk across Monmouthshire.

8.13.22 In terms of climate change mitigation, **minor negative effects** are concluded most likely at this time. Though the RLDP includes policy stipulations to help reduce emissions (including active and public transportation, green infrastructure provision, and encouraging containment within settlements), the level of growth proposed through the housing policies is significant and will increase emissions across Monmouthshire.

9. Conclusions and Recommendations

9.1.1 The overall conclusions for each ISA theme are presented in this Chapter. At this later stage of plan-making no recommendations are identified, recognising that earlier iterations of the ISA have informed plan development.

ISA theme	Conclusion
Economy and employment	Overall, the employment land protections and provisions, alongside well-connected housing and town / local centre development are considered likely to lead to **significant positive effects** for this ISA theme. Additional provisions that seek to improve the local environment and sustainable and active travel connections will also bolster positive effects and support the rural economy and tourism growth.
Population and communities	Considering the above, it is anticipated that implementation of the RLDP will likely lead to **significant positive effects**. This is due to its support of building sustainable and resilient communities across Monmouthshire and tackling the affordable housing challenge. This also reflects the focus of the RLDP on bringing forward different housing development (various types and tenures) in well-connected areas to meet the varying needs of the population.
Health and wellbeing	Overall, it is considered that the RLDP will have **significant positive effects** on the health and wellbeing of Monmouthshire's population. This is through supporting development within proximity to key services and facilities in the higher tier settlements of Monmouth, Abergavenny, Chepstow and Caldicot. It also reflects the focus of the wider policies on bringing forward new infrastructure to support physical and mental health, for example green and blue infrastructure. This will ensure a continued high-quality service of resources in Monmouthshire.
Equalities, diversity, and social inclusion	Considering the above, it is anticipated that **significant positive effects** will come forward as a result of the RLDP for this ISA theme. This is due to the focus on protecting existing and supporting new infrastructure in the neighbourhood area, thereby safeguarding, and improving access to important services and facilities. It also reflects policy requirements for development that promotes accessible and inclusive places. The strategic allocations for housing development also contribute to equalities, diversity, and social inclusion – linked to their ability to provide a significant number of affordable houses that are supported by existing infrastructure within the primary settlements.

ISA theme	Conclusion
Transport and movement	Considering the above, **significant positive effects** are concluded likely for the transportation and movement ISA theme under the RLDP. This reflects the focus on bringing forward strategic allocations in settlements with a good distribution of services and facilities and transportation infrastructure. Furthermore, there is a focus on prioritising existing public rights of way and active transportation infrastructure and enhancing the network where appropriate. This will likely contribute to reducing the reliance on private vehicles to move around the area and will help support the transportation network in Monmouthshire.
Natural resources (air, land, minerals and water)	In summary, the plan includes a good level of provision for mineral safeguarding and water quality and works well to reduce impacts on air quality. However, it is noted there is a need to conserve greenfield sites. It is recognised there are limited brownfield opportunities within Monmouthshire, and the plan works well to allocate strategic sites within settlement boundaries and adjacent to built up areas. However, at this time, **significant negative effects** are concluded likely for the impact on natural resources, due to the substantial (and unavoidable) loss of greenfield and agricultural land.
Biodiversity and geodiversity	Considering the above and with nutrient neutrality solutions now in place, **minor positive effects** are considered most likely for the biodiversity and geodiversity ISA theme under the RLDP. This is due to the policy framework avoiding adverse impacts on important sites for biodiversity, and the focus of the plan on bringing forward net gains and improving ecological connectivity.
Historic environment	At this time, **minor negative effects** are concluded most likely under the RLDP for this ISA theme. This reflects the proximity of site allocations to heritage features, and their potential to impact upon the historic environment where the design and layout of development will be crucial to minimise negative effects, as guided by the Deposit Plan policies. There are also notable policy provisions included under the RLDP, which will directly and indirectly benefit the historic environment by protecting specific features and enhancing the wider setting they are located within.

ISA theme	Conclusion
Landscape	At this time, **minor negative effects** are considered most likely in relation to the landscape ISA theme. Whilst development will impact upon landscape character and quality in Monmouthshire, the RLDP works well to reduce this impact by allocating sites within settlement boundaries and outside of landscape designations. Furthermore, the development policies and wider policy provisions under the RLDP work to maintain and enhance landscape character and quality – for example, through green infrastructure provision and resisting development in the open countryside. Despite this, considerable greenfield loss will impact the landscape cumulatively.
Climate change (including flood risk)	At this time, **neutral effects** are considered most likely in relation to climate change adaptation. This reflects the allocation of strategic sites at little to no risk of flooding. This conclusion is also based on the policy provisions of the RLDP, including those under Strategic Policy S4 (Climate Change), which seek to reduce flood risk across Monmouthshire. In terms of climate change mitigation, **minor negative effects** are concluded most likely at this time. Though the RLDP includes policy stipulations to help reduce emissions (including active and public transportation, green infrastructure provision, and encouraging containment within settlements), the level of growth proposed through the housing policies is significant and will increase emissions across Monmouthshire.

10. Next Steps and Monitoring

10.1 Next steps

10.1.1 This ISA Report will accompany the Deposit Plan for public consultation. Any comments received will be reviewed and considered as part of the iterative plan-making and ISA process and inform the submission RLDP.

10.2 Monitoring

10.2.1 Table 10.1 table below outlines the proposed monitoring for the RLDP. This will be refined in the ISA Adoption Statement.

Table 10.1: Proposed ISA monitoring programme for the RLDP

ISA theme	Proposed monitoring measure
Economy and employment	• Overall employment and unemployment rate. • Net additional employment floorspace. • Net additional floorspace of commercial development by location. • Net improved quality employment floorspace. • Annual tourism income. • Net additional tourism development by location and type.
Population and communities	• Five-year housing land supply. • Number of pitches for travellers and travelling showpeople provided. • Regular updates to the Gypsy, Traveller and Travelling Showpeople Accommodation Assessment. • Number of affordable homes completed in the reporting year. • Number of homes completed by type and bedroom size in the reporting year. • Number of homes completed providing specialist accommodation in the reporting year. • Number of self-build/ custom build homes completed in the reporting year.
Health and wellbeing	• Area of new accessible natural spaces provided through development proposals. • Areas of improved access to natural green spaces provided through development proposals. • New active travel connections by location. • Loss/ gain of public open space by type. For example, park, children's playground, allotments.
Equalities, diversity, and social inclusion	• Indices of multiple deprivation scorings.

ISA theme	Proposed monitoring measure
Transport and movement	• Road junction improvements. • Improvements in accessibility scoring by location for walking and cycling. • Improvement in public transport networks. • Transport Plans agreed by location and land use type. • Additional kilometres of Public Rights of Way.
Natural resources (air, land, minerals, and water)	• Continued air quality monitoring data at air quality monitoring locations. • AQMA revocations. • Area of contaminated land remediated in reporting year. • Number and location of schemes implemented with sustainable drainage serving existing as well as new development. • Number and location of development including watercourse re-naturalisation or flood storage areas. • Number and location of development schemes affecting mineral safeguarding areas. • Area and location of brownfield redevelopment in the reporting year. • Loss of agricultural land by grade. • Area of greenfield development in the reporting year. • Number and location of developments contributing to maintenance of water infrastructure. • Number and location of non-domestic schemes achieving a reduction in water usage over the baseline.
Biodiversity and geodiversity	• Action Plan targets that monitor and manage the impacts of growth on internationally designated sites (SACs/ SPAs/ Ramsar) • Net gains/ losses of buffer land and alternative green space by function that reduce pressures of growth designated sites. • Net gain/ loss of habitat arising from development proposals. • New linkages between habitats by location.
Historic environment	• Number, type, and location of approved development impacting on a heritage asset. • Number of heritage assets improved and raised out of the ‘at risk’ category.
Landscape	• Positive landscape impact assessments on proposals approved.

ISA theme	Proposed monitoring measure
	• Negative landscape impact assessments on proposals refused.
Climate change (including flood risk)	• New developments containing electric vehicle charging points by land use type. • Number, location, and type of proposals achieving low carbon design. • Number of decentralised low carbon and renewable energy schemes approved in development. • Approvals of development in Flood Risk Zones 2, 3a, and 3b by use class and flood risk compatibility. • Refusals of development in Flood Risk Zones 2, 3a, and 3b.

Appendix A – Regulatory requirements

As discussed in Chapter 1 of the main report, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 explains the information that must be contained in the ISA Report; however, interpretation of Schedule 2 is not straightforward. **Table A** links the structure of this report to an interpretation of Schedule 2 requirements, whilst **Table B** explains this interpretation. **Table C** provides a checklist of where and how the requirements have been met in this report.

Table A: Questions answered by the ISA Report, in accordance with an interpretation of regulatory requirements

Report section	Questions answered	Regulatory requirement met
Introduction	What is the plan seeking to achieve?	• An outline of the contents, main objectives of the plan, and relationship with other relevant plans and programmes.
	What is the scope of the ISA?	• Relevant environmental protection objectives, established at international or national level. • Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance. • Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan. • The environmental characteristics of areas likely to be significantly affected. • Key environmental problems/ issues and objectives that should be a focus of (i.e., provide a 'framework' for) assessment.
Part 1	What has plan-making/ ISA involved up to this point?	• Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach). • The likely significant effects associated with alternatives. • Outline reasons for selecting the preferred approach in light of the alternatives assessment/ a description of how environmental objectives and considerations are reflected in the Plan.
Part 2	What are the ISA findings at this current stage?	• The likely significant effects associated with the Plan. • The measures envisaged to prevent, reduce, and offset any significant adverse effects of implementing the Plan.
Part 3	What happens next?	• A description of the monitoring measures envisaged.

Table B: Questions answered by the SA Report, in accordance with regulatory requirements

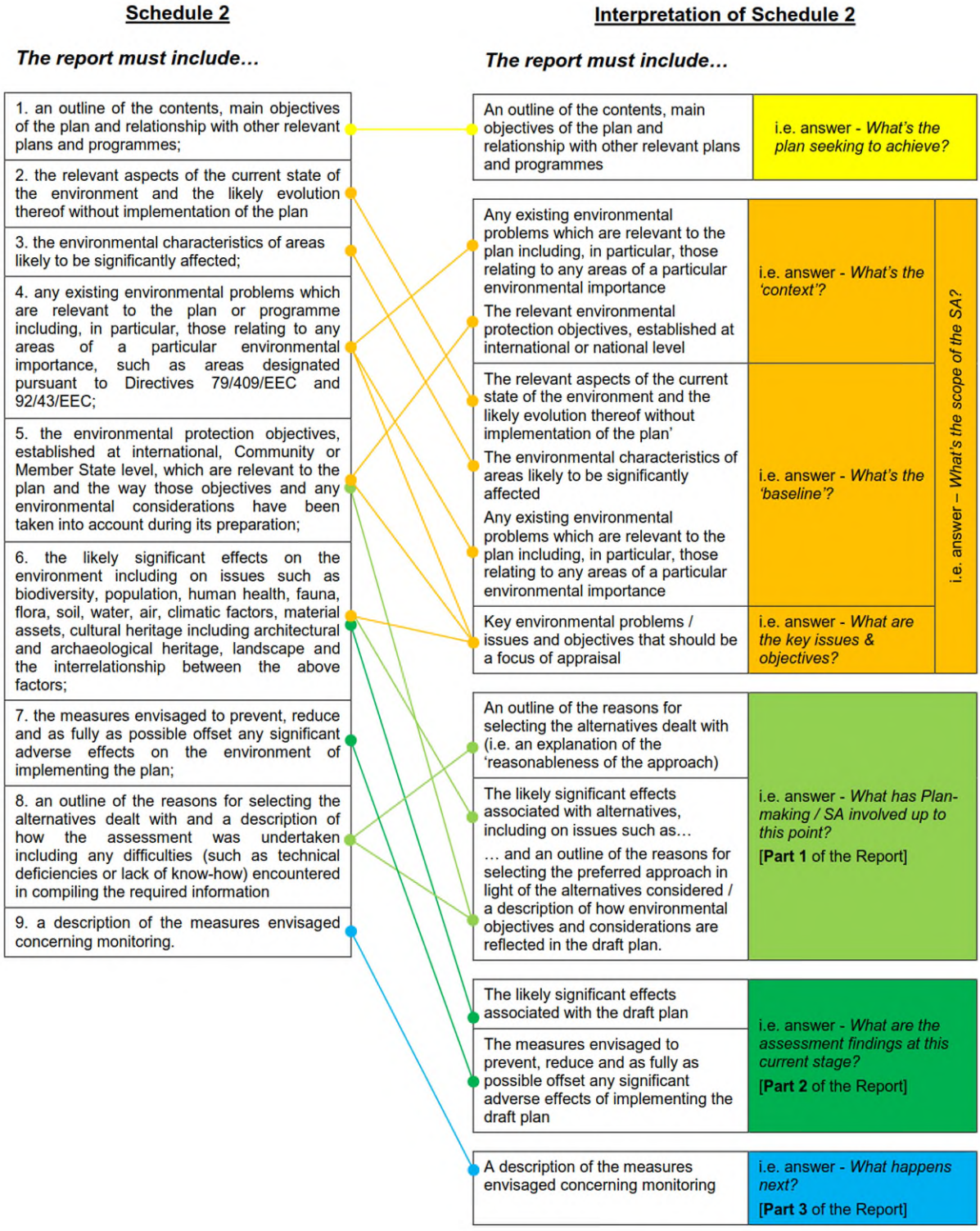


Table C: 'Checklist' of how (throughout the SA process) and where regulatory requirements are or will be met.

Regulatory requirement	Discussion of how the requirement is met
Schedule 2 requirements:	
1. An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes.	Chapter 2 ('What's the plan seeking to achieve') presents this information. The relationship with other plans and programmes is also set out in scoping information (available separately).
2. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	These matters were considered in detail at the scoping stage, which included consultation on a Scoping Report published in 2018. The outcome of scoping was an 'ISA Framework', and this is presented within Chapter 3 ('What's the scope of the ISA'). More detailed messages are reported in the Scoping Report
3. The environmental characteristics of areas likely to be significantly affected.	
4. Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.	
5. The environmental protection objectives established at international, national, or community level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.	The Scoping Report (2018) presents a detailed context review and explains how key messages from the context review (and baseline review) were then refined to establish an 'ISA framework'. The scoping information is presented in the Scoping Report. The context review informed the development of the ISA framework and topics, presented in Chapter 3, which provide a methodological 'framework' for appraisal. With regards to explaining "how… considerations have been taken into account" - • Chapter 5 explains how reasonable alternatives were established in-light of available evidence. • Chapter 6 sets out the detailed appraisal of alternative options. • Chapter 7 explains the Council's 'reasons for supporting the preferred approach', i.e., explains how/ why the preferred approach is justified in-light of alternatives appraisal (and other factors). • Chapter 8 sets out the findings of the appraisal of the draft plan and Chapter 9 provides a summary of the findings and any recommendations.
6. The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape, and the interrelationship between the above factors. (Footnote:	• Chapter 5 explains how reasonable alternatives were established in-light of available evidence. • Chapter 6 sets out the detailed appraisal of reasonable alternatives. • Chapter 8 sets out the findings of the appraisal of the draft plan and Chapter 9 provides a summary of the findings and any recommendations.

Regulatory requirement	Discussion of how the requirement is met
these effects should include secondary, cumulative, synergistic, short-, medium-, and long-term, permanent and temporary, positive and negative effects).	As explained within the various methodology sections, as part of appraisal work, consideration has been given to the ISA scope, and the need to consider the potential for various effect characteristics/ dimensions.
7. The measures envisaged to prevent, reduce, and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.	Where necessary, mitigation measures are identified within the alternatives appraisal (in Chapter 6 and Appendices B - D) and appraisal of the Plan (Chapters 8 and 9).
8. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.	Chapter 5 deals with 'Reasons for selecting the alternatives dealt with', in that there is an explanation of the reasons for focusing on particular issues/ options. Also, Chapter 7 explains the Council's 'reasons for selecting the preferred option' (in light of alternatives appraisal). Methodology is discussed at various places, ahead of presenting appraisal findings, and limitations/ assumptions are also discussed as part of appraisal narratives.
9. A description of the measures envisaged concerning monitoring in accordance with Article 10.	Monitoring measures are set out in Chapter 10.
10. A Non-Technical Summary of the information provided under the above headings.	A Non-Technical Summary (NTS) is provided separately.
The ISA Report must be published alongside the Draft Plan, in accordance with the following regulations: Authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the Draft Plan or programme and the accompanying SA Report before the adoption of the plan or programme (Art. 6.1 and 6.2).	At the current time, this ISA Report is being published alongside the Deposit Plan for public consultation.
The ISA Report must be taken into account, alongside consultation responses, when finalising the Plan. The SA Report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6, and the results of any transboundary consultations entered into pursuant to Article 7, shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.	The Council will take into account this Interim SA Report when preparing the submission version of the Local Plan for examination.

Appendix B – ISA of level of growth options

Linked to Chapters 5 and 6, this appendix provides the detailed assessment of the level of growth options. The level of growth options are detailed in Table AB.1.

Methodology

For each of the strategic options, the assessment examines likely significant effects on the baseline, drawing on the sustainability objectives and topics identified through scoping (see Table 3.1 in the main report) as a methodological framework.

Every effort is made to predict effects accurately; however, this is inherently challenging given the high-level nature of the options under consideration. The ability to predict effects accurately is also limited by understanding of the baseline (now and in the future under a 'no plan' scenario). In light of this, there is a need to make considerable assumptions regarding how scenarios will be implemented 'on the ground' and what the effect on particular receptors would be. Where there is a need to rely on assumptions in order to reach a conclusion on a 'significant effect' this is made explicit in the appraisal text.

It is important to note that effects are predicted considering the criteria presented within Regulations. So, for example, account is taken of the duration, frequency, and reversibility of effects. Cumulative effects are also considered (effects of the plan in combination with the effects of other planned or on-going activity that are outside the control of Monmouthshire County Council).

Based on the evidence available a judgement is made if there is likely to be a significant effect. Where it is not possible to predict likely significant effects on the basis of reasonable assumptions, efforts are made to comment on the relative merits of the alternatives in more general terms and to indicate a rank of preference. The number indicates the rank and does not have any bearing on likely significant effects. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of 'significant effects'. For example, if an option is ranked as 1 then it is judged to perform better against that ISA topic compared to an option that is ranked 2 or 3 and so on.

Table AB.1: Level of growth options

Growth option	Type of scenario	Population change 2018-2033	Population change %	Average net migration per annum	Household change 2018-2033	Household change %	Dwellings per annum	Dwellings 2018-2033	Jobs per annum	Jobs 2018-2033
Existing Preferred Strategy growth *Population-led (with added policy assumptions)* *(PG Long Term (adjusted) (5yr) (MR, CR_R), AH)*	Demographic	12,443	13.2%	1,216	7,255	18.1%	507	7,605	481	7,215
Demographic led strategy for the LPA area *Population-led (with added policy assumptions)* *(PG Long Term (adjusted) (5yr) (MR, CR_R)*	Demographic	9,480	+10.9%	930	5,160	+14%	360	5,400	416	6,240

WG prescribed growth *Dwelling-led* *(WG prescribed 285 dpa)*	Dwelling	8,050	+9.3%	830	3,900	+10.6%	285	4,280	286	4,290

Economy and employment

Options	Option 1 – Existing preferred strategy	Option 2 – Demographic-led strategy	Option 3 – WG prescribed growth
Rank	**1**	**2**	**3**
Significant effect?	**Yes - positive**	**Yes - positive**	**No**

Option 1 seeks to deliver a higher economic growth level than Options 2 and 3 and as a result, is expected to be best performing in relation to this ISA theme. The housing growth proposed alongside economic development also seeks to address potential demographic imbalances with growth in key working age groups. Option 1 is likely to support the retention of younger age groups and reduce out-commuting through growth with high levels of sustainable local access. Option 1 is also predicted to provide opportunities to encourage a more diverse and vibrant economy; notably providing opportunities associated with the Cardiff Capital Region City Deal, the SE Wales Metro, and the removal of the Severn Bridge toll. Considering these benefits to local economy and employment, significant long-term positive effects are anticipated under Option 1.

Option 2 would result in a growth in jobs of 416 pa, which would encourage greater indigenous business growth and encourage inward investment. This would contribute positively towards creating a thriving, well-connected, diverse economy and would assist in building sustainable and resilient communities.

Option 3 represents jobs growth at a lower rate than past delivery rates, and the demographic projections indicate a declining workforce (although there is some growth in the 30-44 age groups), as well as a declining customer base, under this option. The employment growth proposed eventually brings job levels in the County broadly in line with the average job level seen over the last 15 years, but not until the end of the Plan period. As a result, negative effects are considered likely, with Option 3 therefore worst performing in this respect.

To summarise, there is an assumption that the higher the level of economic and housing growth, the greater the potential significance of positive effects. Option 1 therefore is considered likely to lead to positive effects of greatest significance, supporting a well-connected diverse economy, and is ranked highest. Significant positive effects are also predicted in relation to growth Option 2 as while the level of economic and housing growth is lower than Option 1, there remains net positive job creation and dwellings per annum. However, effects are likely to be negative under Option 3 given the overall decline in working age population in the county, and the option is ranked least favourably.

Population and communities

Options	Option 1 – Existing preferred strategy	Option 2 – Demographic-led strategy	Option 3 – WG prescribed growth
Rank	**1**	**2**	**3**
Significant effect?	**Yes - positive**	**Yes - positive**	**No**

The latest Monmouthshire Annual Monitoring Report of the Adopted LDP (2022-2023) shows that the annual level of housing completions monitored against the Average Annual Requirement (AAR) is no longer recorded, given the 10 year housing requirement of 4,500 units was reached in March 2021. However, it does show that the total cumulative completions monitored against the cumulative requirement (Cumulative AAR) is underdelivering. As such, it is considered that options 1 and 2 would perform positively in terms of contributing towards meeting and sustaining sufficient land supply for the forthcoming Plan period, supporting the future vitality of communities. Option 3 however would deliver limited residential allocations, performing least positively in this respect.

Options 1 to 3 deliver gradually decreasing levels of growth, and it is assumed that as the level of growth increases, so does the ability to address historic under-delivery, and deliver a greater range/ mix of new homes to help meet the needs of all residents in the County, including affordable housing. Higher levels of growth also increase the potential for accessibility improvements and other community benefits associated with development, including new and improved service and facility provision, extended green infrastructure, transport and infrastructure upgrades, new open spaces, and an improved public realm. Option 1 therefore performs most positively in this respect, followed by Option 2.

The delivery of community benefits will be particularly important in addressing potential future demographic imbalances, and modelling suggests that natural balances are more likely to be achieved with the growth levels proposed under Option 1. Under this higher growth option, growth in younger age brackets, particularly those of working age, balance out the effects of an ageing population, and new development provides the opportunity to address the changing needs of residents in this respect.

While high growth proposed through Option 1 presents the potential to deliver a greater level of infrastructure improvements, the option, given the scale of growth in the context of the County, may also place increased demands on existing infrastructure. Notably, in terms of education, Option 1 would likely result in a significant growth in the number of school aged children, placing more pressure on the capacity of existing schools. However, the level of housing delivery would provide a substantial opportunity to secure additional provision through planning gain to fund extensions and/ or new schools. Conversely, lower growth proposed through Option 3 would likely lead to an unbalanced demographic, and likely see falling school numbers which could in turn result in the closure of schools. Finally, in terms of

Option 2, it is recognised that while the level of growth from younger age groups is at a low level, a more balanced demography has the potential to secure a level of new infrastructure and support balanced communities.

Taking the above into account it is considered that as the level of growth increases so does the likelihood for positive effects of significance. Option 1 would provide a greater range of new homes to meet the predicted increased population and affordable housing needs and is therefore more likely to have a residual significant effect when considered against Options 2 and 3. Option 1 is ranked most favourably accordingly, however, it is noted with Option 1 that there is a need to manage the impacts of growth on local infrastructure capacity so that it does not place unnecessary burdens on existing infrastructure. Option 2 also has the potential to reduce burdens in this respect, but notably will deliver less growth than Option 1 leading to positive effects of less significance. Option 3 is the worst performing as would lead to an unbalanced demographic with limited opportunities to build sustainable communities and support the County's younger population. Any effects are therefore likely to be minor in nature.

Health and wellbeing

Options	Option 1 – Existing preferred strategy	Option 2 – Demographic-led strategy	Option 3 – WG prescribed growth
Rank	1	2	3
Significant effect?	Yes - positive	Yes - positive	No

At the time of the 2021 Census, 46.4% of Monmouthshire residents felt that they were in 'very good health' (Wales 46.2%), whilst 4.4% felt that they were in 'bad health' (Wales 5.3%). This reflects the 2021/2022 data on lifestyle and behavioural choices for adults in Wales, which shows that Monmouthshire has a lower proportion of smokers, e-cigarette users, and those who are overweight and/ or obese.[29] However, Monmouthshire has a higher percentage (23%) of those who consume more than 14 units of alcohol on a weekly basis, which was higher by 7% than in the Aneurin Bevan Health Board area and Wales.[30] The 2019 WIMD health domain further highlights deprivation relating to the lack of good health. In Monmouthshire, there are 20 LSOAs in the 50% most deprived, 5 LSOAs in the 30% most deprived, and 2 LSOAs in the 20% most deprived.

In terms of access to the countryside, green/ open spaces, it could be suggested that as the level of growth increases so does the potential for accessibility to be reduced in this respect; for example where countryside is lost at settlement edges. However, this is dependent on the

[29] StatsWales (2022) Adult lifestyles by local authority and health board [online] available at: https://statswales.gov.wales/Catalogue/National-Survey-for-Wales/Population-Health/Adult-Lifestyles/adultlifestyles-by-healthboard-from-202021
[30] Ibid

exact location of development and therefore effects are uncertain under all options at this stage. Furthermore, the higher level of growth under Option 1 could increase pressure on existing health services; and it is recognised that Monmouthshire has one main hospital, Nevill Hall Hospital in Abergavenny. Despite this, there are certain health benefits associated with growth and development. This includes the potential for new or improved community services and facilities supporting growth in the County, including healthcare, public spaces, green infrastructure and retail and leisure. Further, development which delivers transport and infrastructure upgrades, including active travel upgrades, can improve accessibility and safety for residents. The importance of improved connectivity and accessibility to local facilities and open space, in light of the recent pandemic, highlights the potential for higher growth under Option 1, and to a lesser extent Option 2, to support more positive health outcomes than Option 3. However, there is also a need to manage the impacts of growth on local infrastructure capacity to ensure that no unnecessary burdens are placed on existing infrastructure. Option 1 followed by Option 2 will likely ensure communities are balanced, healthy, and socially sustainable, with the potential for significant long term positive effects.

Lower growth proposed through Option 3 could negatively impact on communities and exacerbate negative health implications by providing limited opportunities for job creation or improvements to existing services and facilities. The unbalanced demographic and low level of dwelling and job creation provides little opportunity to support social sustainability and balanced communities. While negative effects are unlikely to be significant under Option 3, Option 3 nonetheless performs least favourably of all options.

Equalities, diversity, and social inclusion

Options	Option 1 – Existing preferred strategy	Option 2 – Demographic-led strategy	Option 3 – WG prescribed growth
Rank	**1**	**2**	**3**
Significant effect?	**Yes - positive**	**Yes - positive**	**No**

At this stage the location of growth is not known, as a result it is difficult to determine how specific communities and protected characteristics are likely to be affected by the Options. As indicated through the appraisal under other themes, increased levels of growth provide an opportunity to deliver a greater mix of housing and employment to meet the needs of all members of the community. There is also the potential to deliver greater improvements to community infrastructure and the public realm, but this is uncertain at this stage. In this context, a higher level of growth could help to address areas of deprivation depending on where it is located. Furthermore, a higher level of growth could also be more likely to meet the needs of people across a wider area of the County; however, again this would be dependent on the preferred spatial strategy.

Whilst lower growth could be argued to help protect the identity of existing communities, Option 3 has the potential to impact negatively on the age profile of the County leading to an unbalanced demographic, with the continuation of an ageing population over the Plan period. Under Option 3 there will be limited opportunities for the younger population to live and work in the County, through providing limited opportunities for job creation or improvements to existing services and facilities. This is likely to exacerbate inequality, in particular, the effects of rural isolation which will negatively impact groups with protected characteristics, such as the young, elderly and disabled, who tend to be disproportionately affected by accessibility issues. Difficulties in sustaining services/facilities across the County as well as limited opportunities to improve a range of infrastructure, including active travel and digital infrastructure would further increase deprivation issues, the significance of which has been particularly highlighted through the recent pandemic. As a result, Option 3 is predicted to lead to negative effects, though these effects are unlikely to be significant, the option is judged to perform least favourably of all options.

Higher growth under Option 1 would likely result in a more balanced demographic with an increase in the number of older and elderly people living in the County balanced against an increase in the younger age groups. Option 2 would also provide a more balanced demographic however it should be recognised there is some decline in the 20-29 age group. New development through Option 2 could provide opportunities to support the rural economy and address rural isolation and social inequality, but positive effects are likely to be greater in this respect through Option 1. Both Options 1 and 2 present opportunities to improve accessibility and reduce inequalities through an appropriate spatial strategy, delivering sustainable local communities.

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Taking the above into account, both Options 1 and 2 have the potential to lead to significant positive effects through the delivery of new homes, jobs and community infrastructure that strategically improves accessibility and connectivity within the County. It is however recognised that Option 1 could enhance the significance of these effects through planning for more homes, and therefore Option 1 ranks highest overall.

Transport and movement

Options	Option 1 – Existing preferred strategy	Option 2 – Demographic-led strategy	Option 3 – WG prescribed growth
Rank	**1**	**2**	**3**
Significant effect?	**No**	**No**	**No**

At this stage, there is no evidence to suggest that the levels of growth proposed under any of the options would have a significant negative effect on the highway network. Whilst all options propose a level of growth that could lead to negative effects in terms of congestion, negative effects are not considered likely to be significant. Further, in light of the recent pandemic, it is likely that higher levels of homeworking will also prevail as a longer-term trend. Higher growth Option 1, followed by Option 2, further provide greater critical mass to enable more significant infrastructure improvements. This is particularly important given the wider ambitions to transition to a lower-emission infrastructure network, where development will be a key delivery vehicle for the technological and infrastructure advances which underpin the transition, such as expansion of the EV network, smart technologies, last mile deliveries and active travel networks including cycle route connectivity. Conversely, lack of employment opportunities and low housing growth levels under Option 3 would likely result in limited opportunities to enhance transport infrastructure, accessibility, active travel, and the use of sustainable transport options.

The nature and significance of the effects will ultimately be dependent on where the development is located as well as the infrastructure improvements that could be provided. If the additional residential development is located close to the main settlements, taking advantage of the services/ facilities and employment opportunities on offer, and main bus routes, then there is the potential to reduce levels of out-commuting, encourage the use of sustainable transport and therefore encourage a modal shift. Similarly, if growth were to be focussed to the south of the County/ Severnside along the M4 corridor, this would utilise good links to the M4 and other sustainable travel links including rail at Caldicot and Severn Tunnel Junction Train Stations. Growth to the south would also capitalise upon transport improvements such as the removal of the Severn Bridge toll and the ambitions and opportunities associated with the Cardiff Capital Region City Deal and the SE Wales Metro. If additional growth is located away from the main settlements and Severnside, in the rural areas, then this is likely to exacerbate the current trend of private vehicle use and increase traffic on the road network in the absence of significant interventions; given sustainable transport infrastructure is limited in these locations.

Considering the above, whilst no significant effects are predicted, much uncertainty remains about the overall performance of the options in relation to this ISA theme until the spatial strategy is more clearly defined. However, it is duly recognised that Options 1 and 2 have greater

potential for positive transport outcomes than the limited opportunities provided through Option 3, and the ranking of Options reflects this assumption.

Natural resources (air, land, minerals, and water)

Options	Option 1 – Existing preferred strategy	Option 2 – Demographic-led strategy	Option 3 – WG prescribed growth
Rank	3	2	1
Significant effect?	Uncertain	Uncertain	Uncertain

As the level of growth increases so does the likelihood for negative impacts on natural resources through the potential loss of greenfield/ agricultural land and mineral resources; reduced air quality as a result of increased traffic; and increased demand for water resources.

Most of the County's main settlements are surrounded by BMV (Grade 3a and above). Alongside soil resources, South Wales is well-endowed with aggregate resources and it has inherited over time a substantial volume of permitted reserves, although the reserves are often variable in terms of quality and location. There is one limestone quarry within Monmouthshire, the Ifton Quarry which whilst not currently worked could be worked in the future. Additional limestone resources exist in the southern part of the County, but in general, the area is sensitive in terms of environmental capacity. Furthermore, some parts of the limestone resource lie within the Wye Valley National Landscape (previously Area of Outstanding Natural Beauty, or AONB); MTAN1 (paragraph 49) indicates that no allocations should be made in respect of such areas. There are no significant sources of secondary aggregates in the area. Under the adopted Monmouthshire Local Development Plan Policy M2 (Minerals Safeguarding Areas), safeguarding zones are identified for sand and gravel and limestone resources within the County. A substantial part of the south of the County is affected by the limestone safeguarding area. The sand and gravel deposits are predominantly located in the Usk Valley.

It is considered that mineral landbank obligations could be met under all Options, though it is recognised that increasing levels of growth will put increasing pressure on safeguarded areas, particularly those that encroach upon settlements. The overall loss of agricultural land and mineral resources is uncertain at this stage as it will be dependent on the precise location of development and if the land is greenfield or brownfield. The quality of agricultural land will also play a role in determining the potential significance of effects.

While it is recognised that the provision of housing alongside employment could promote efficient use of land and use of brownfield sites, it is also recognised that brownfield land is sparse throughout the County, and most development is anticipated to take place on greenfield

land. In this respect, Option 3, that proposes a low level of growth, is considered to perform better against this theme as will require less land take. This is reflected in the ranking of Options, with Option 1 performing least positively given it proposes the highest level of growth.

Whilst air pollution is not a significant problem in Monmouthshire, air quality across the County varies with two Air Quality Management Areas (AQMAs) declared in Usk and Chepstow. It is therefore considered that the significance of effects in this respect will be dependent on the location of growth, and the implementation of appropriate mitigation measures. As discussed under the transportation ISA theme, with an increase in population it is considered that higher growth Options 1 and 2 have greater potential for negative effects than Option 3 in relation to congestion on the existing road network. However, no evidence suggests this will lead to effects of significance. Ultimately the spatial strategy should seek to reduce congestion pressures at AQMAs, and new development provides opportunities to address infrastructure upgrade requirements that support more efficient movement in the highways network and active travel. New development also provides opportunities to increase local accessibility, particularly access to employment opportunities, which can in turn support reduced levels of out-commuting and congestion and support a modal shift. A higher level of homeworking brought on by the recent pandemic is also considered likely to continue to some degree as a longer-term trend supporting reduced congestion and improved air quality. Considering this, whilst no significant effects are considered likely at this stage, the overall nature and significance of the effects in relation to air quality under all options remains uncertain until the precise location of development is known.

Water is supplied to Monmouthshire by Dwr Cymru/ Welsh Water (DCWW). They supply water via a large scale, multi-source, integrated network that is typical of many other water company areas. Monmouthshire falls within two Water Resource Zones (WRZs); Monmouth WRZ and the South East Wales Conjunctive Use System (SEWCUS) WRZ. The Monmouth WRZ supplies the market town of Monmouth and the surrounding villages. This WRZ is heavily dependent on the Mayhill abstraction from the River Wye at Monmouth. There is also a spring abstraction at Ffynnon Gaer which supplies a small localised area south of Monmouth. The SEWCUS supplies the majority of the County, and a significant proportion of the South East Wales Region. In total, there are over 40 resources that are used to supply the SEWCUS WRZ, which include a mixture of river abstractions from the larger rivers in the east of the WRZ and relatively small upland reservoir sources with small catchment areas. For both WRZs the total demand for water is forecast to remain relatively stable until 2030, with a decline in demand anticipated over the 2030-2050 planning period, and then to just 10% of current demands by 2050.[31]

Water companies are legally required to supply water to private consumers and businesses within their area. As set out in the Water Industry Act 1991, they must prepare and maintain a Water Resources Management Plan (WRMP) that sets out how the company intends to maintain the balance between water supply and demand. Water companies update their WRMPs every 5 years to take account of predicted growth and ensure that there are schemes in place to meet future demands. As the scale of growth proposed under the options increases so does the pressure on water resources. However, given the legal requirements in place for WRMPs, it is considered that there

[31] Welsh Water (2019) Final Water Resources Management Plan 2019 https://www.dwrcymru.com/en/My-Water/Water-Resources/Final-Water-Resources-Management-Plan-2019.aspx

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are no significant differences between the options in terms of effects on water resources. It is expected that development coming forward under any of the options can deliver water efficiency measures to support reduced water use per person per day.

There are 45 water bodies within Monmouthshire, 38 surface waters, such as rivers, lakes, canals and greens, and 7 groundwater bodies. 37 of these water bodies have been designated as protected areas, these are areas requiring special protection under other EC directives and waters used for the abstraction of drinking water. Not all water bodies are required to be assessed for chemical status, of the 15 in Monmouthshire which are required to be assessed 2 are failing to achieve good status, one groundwater and one river. The river that is failing is the section of the River Usk between the confluence with the River Gavenny and the confluence with the Olway Brook. The main reasons for the failures identified by these assessments have been identified as diffuse pollution from agriculture, low flows/ abstraction and physical modifications to watercourses, predominantly barriers to fish migration. In addition, there are some known urban diffuse sources from combined sewer overflows/ misconnections, affecting the Nedern Brook and the Gavenny River.

Option 1 proposes a high level of growth, and therefore could place increased pressure on sewerage infrastructure; with the potential for long term negative effects. The increased growth could have impacts on water quality through increased impermeable surfaces and transfer of pollutants, but it is considered that there is suitable mitigation available at a development management level to ensure that residual effects are not significant. Taking the above into account, it is considered that there are no significant differences between the options at this stage in terms of the water environment.

Biodiversity and geodiversity

Options	Option 1 – Existing preferred strategy	Option 2 – Demographic-led strategy	Option 3 – WG prescribed growth
Rank	3	2	1
Significant effect?	Uncertain	Uncertain	Uncertain

In terms of biodiversity and geodiversity the impacts will ultimately be dependent on the precise location of development. There are five European sites (Special Areas of Conservation (SAC), Special Protections Areas (SPA) or Ramsar sites) within the County; Severn Estuary SAC/ SPA/ Ramsar Site, River Wye SAC, River Usk SAC, Wye Valley Woodlands SAC, and the Wye Valley and Forest of Dean Bat sites SAC. Additionally, there are a further four European Sites within the Brecon Beacon National Park which must also be considered. These are Coed y Cerrig SAC, Cwm Clydach Woodlands SAC, Sugar Loaf Woodlands SAC, and Usk Bat Sites SAC. Further to this, Llangorse Lake/ Llyn Syfaddan SAC, in Powys, Avon Gorge Woodlands SAC and Aberbargoed Grassland SAC Caerphilly fall within 15km of Monmouthshire and could possibly be affected by growth proposed through the RLDP.

In terms of nationally designated sites, there are 50 SSSIs that fall wholly within the County. Most are woodland or grassland sites, with others designated for their wetland or geological interest, and a few designated for bat interest. It is noted that of these, 16 fall within the SACs listed above. Spatially, a significant proportion of the SSSIs are located to the north west of the County, within the Brecon Beacons National Park and surrounding Abergavenny. Fiddler's Elbow SSSI and Lady Park Wood SSSI are also the County's two National Nature Reserves (NNRs), located within the County, east of Monmouth. In terms of locally important biodiversity, there is one Local Nature Reserve (LNR) designated within the County; Cleddon Bog. There are also approximately 650 Sites of Importance for Nature Conservation (SINCs) (also known as Local Wildlife Sites (LWSs) designated within the County.

It is assumed that none of the Options would result in the loss of any international, national, or locally designated sites or lead to negative effects of significance in this respect. However, the decreasing level of growth under Options 1 to 3 is likely to require decreasingly less land take. As land take increases, there is likely to be wider habitat loss and fragmentation as well as increased pressure; notably disturbance (through recreation, noise, and light pollution), atmospheric pollution, and through impacts on water quality and resources. It is recognised that a HRA is currently being revised for the RDLP, which will determine the impact on the designated sites and their features. For the purposes of ranking the options, it is considered at this stage that Option 1, by proposing the highest level of growth has the greater potential for negative effects of significance in relation to designated sites. This is followed by Option 2, with the lowest growth Option 3 performing most positively in this respect. The ranking of Options reflects this assumption.

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Despite this, it is recognised that higher levels of growth could also offer greater opportunities for delivering biodiversity net gain, creating new linkages through improvements to green infrastructure, securing and/ or enhancing ecological connectivity, public open space, and recreation provision through planning gain. However, this is uncertain at this stage as the location of development is not known. The nature and significance of residual effects will therefore ultimately be dependent on the exact location, design/ layout of development, the implementation of mitigation measures, and the sensitivity of receptors.

Overall, it is considered that effects are uncertain for all options, in the absence of known development locations. In terms of ranking the options, there is an assumption that as the level of growth increases through Options 2 and 1, so too does the potential significance of negative effects. Option 3 (lowest growth) is therefore ranked as the best performing option, and Option 1 (highest growth) worst; although it is recognised that an appropriate spatial strategy under any option could avoid significant negative effects arising.

Historic environment

Options	Option 1 – Existing preferred strategy	Option 2 – Demographic-led strategy	Option 3 – WG prescribed growth
Rank	**3**	**2**	**1**
Significant effect?	**Uncertain**	**Uncertain**	**Uncertain**

In terms of the historic environment the impacts will ultimately be dependent on the precise location and design of development. Monmouthshire has 31 Conservation Areas that are dispersed throughout the County. There are also 45 Historic Parks and Gardens varying considerably in size and character, three Landscapes of Outstanding Historic Interest, including Blaenavon Industrial World Heritage Site, and 164 Scheduled Monuments within Monmouthshire. There are also 2,149 listed buildings spread across the County.

While it is assumed that none of the Options would result in the loss of any designated heritage assets, all options have the potential to lead to significant negative effects, dependant entirely on the location of growth. In terms of ranking the options there is an assumption that the highest level of growth (Option 1) has the potential to result in greater levels of settlement expansion, loss of countryside at the settlement edge, affect views into and from settlements, which is particularly important for areas with designated conservation areas. Conversely effects in this respect could be lesser under low growth (Option 3). This is uncertain at this stage as the location of development is not known, but the ranking of options reflects these assumptions.

It is also highlighted that options delivering the highest levels of growth could also offer more opportunities to improve access to designated heritage assets or help to redevelop brownfield areas that are currently detracting from the historic environment. However, again this is uncertain at this stage. The nature and significance of residual effects will therefore ultimately be dependent on the exact location, design/ layout of development and the implementation of mitigation measures.

At this stage it is not possible to confirm any significant differences between the Options or conclude that they are likely to have significant effects on the historic environment. None of the Options are likely to have a significant effect on the Welsh language.

Landscape

Options	Option 1 – Existing preferred strategy	Option 2 – Demographic-led strategy	Option 3 – WG prescribed growth
Rank	**3**	**2**	**1**
Significant effect?	**Uncertain**	**Uncertain**	**Uncertain**

As for a number of other ISA themes, the nature and significance of effects on landscape/ townscape impacts will ultimately be dependent on the precise location and design of development. Monmouthshire has a rich and diverse landscape, incorporating part of the Wye Valley National Landscape to the east of Monmouthshire and part of the Brecon Beacons National Park to the north west. The portion of the Brecon Beacons National Park (BBNP) located in Monmouthshire covers some 14,880 hectares, which accounts for approximately 17% of the County. The part of the Wye Valley National Landscape located within Monmouthshire covers approximately 11,710 hectares and accounts for approximately 16% of Monmouthshire. There are also three landscapes of outstanding historic interest within Monmouthshire; including the Blaenavon Industrial World Heritage Site, the Gwent Levels and the Lower Wye Valley. A small portion of the Blaenavon World Heritage Site (approximately 20 hectares) lies within the Monmouthshire local planning area.

The decreasing levels of additional growth proposed under Options 1 to 3 are likely to require decreasing levels of land take. As such, highest land take under Option 1 is likely to place the greatest pressure on greenfield land resources, resulting in wider impacts on the landscape across the County. Given the limited brownfield land available in the County, it is considered that most additional growth will be delivered on greenfield land on the edge of existing settlements, placing increased pressure on the County's landscape interests and rural character with the potential for long term negative effects. While effects are broadly uncertain at this stage as the location of development is not known, the ranking of options reflects these assumptions.

It is noted that the delivery of any additional growth in the more rural areas is also more likely to result in a residual negative effect of greater significance, but again, this is dependent on the sensitivity of the landscape and scale and design/ layout of development.

Alongside the potential for negative effects, it is recognised that there is also the opportunity for growth to deliver landscape enhancements; maximising opportunities to create new linkages through improvements to green infrastructure and ecological connectivity, and to secure and/or improve public open space and recreation provision through planning gain. Opportunities to deliver positive effects in this respect are considered to increase as the level of growth increases, but likely to be minor overall when considered in the context of greenfield development. As above, the nature and significance of effects will ultimately be dependent on the exact location, design/ layout of development, and the implementation of mitigation measures.

Considering the above, the overall effects remain uncertain for most Options. Despite this, the increased pressures on greenfield land and rural landscapes under higher growth Options 1 and 2 are reflected in the ranking of the Options.

Climate change (including flood risk)

Options	Option 1 – Existing preferred strategy	Option 2 – Demographic-led strategy	Option 3 – WG prescribed growth
Rank	**1**	**2**	**3**
Significant effect?	**Uncertain**	**Uncertain**	**Uncertain**

In terms of climate change mitigation, a higher level of growth will ultimately lead to increased levels of greenhouse gas (GHG) emissions. At this stage, no specific opportunities, that would help to significantly reduce per capita GHG emissions or deliver new low carbon or renewable energy infrastructure, are known. It is also assumed that development proposed under any of the options has the potential to incorporate renewable or low carbon energy.

However, higher growth options are noted for their greater potential to support infrastructure upgrades that reduce congestion and improve accessibility (particularly in terms of sustainable transport and active travel), and support a transition to lower-emission, and carbon neutral economies and networks. Further, the higher growth options are also considered for their greater potential to contribute to improved ecological connectivity, green infrastructure networks, open spaces, and urban greening measures which support improved climate resilience. As a result, higher growth options are considered for greater potential positive outcomes, and this is reflected in the ranking of options, with Option 1 performing most favourably overall.

In terms of climate change adaptation, it is assumed that susceptible development proposed under all options would be directed to areas of lower flood risk as per the requirements of sequential testing. It is also assumed that there is suitable mitigation available to ensure that the additional development does not increase flood risk, for example through the delivery of sustainable drainage systems in accordance with National Planning Policy and Sustainable Drainage (SUDs) legislation. Alongside the potential for negative effects, it is recognised that there is also the opportunity for growth to deliver landscape enhancements; maximising opportunities to create new linkages through improvements to green infrastructure and ecological connectivity, and to secure and/or improve public open space and recreation provision through planning gain. Opportunities to deliver positive effects in this respect are considered to increase as the level of growth increases, but likely to be minor overall when considered in the context of greenfield development. As above, the nature and significance of effects will ultimately be dependent on the exact location, design/ layout of development, and the implementation of mitigation measures.

Considering the above, the overall effects remain uncertain for all Options. Despite this, the increased pressures on greenfield land and rural landscapes under higher growth Options 1 and 2 are reflected in the ranking of the Options.

Appendix C – ISA of location of growth options

Linked to Chapters 5 and 6, this appendix provides the detailed assessment of the location of growth options. The location of growth options are detailed in Table AC.1. A comparative appraisal of the options has been carried out under each ISA Theme. The appraisal assumes that each option will deliver the same quantum of growth.

Methodology

For each of the strategic options, the assessment examines likely significant effects on the baseline, drawing on the sustainability objectives and topics identified through scoping (see Table 3.1 in the main report) as a methodological framework.

Every effort is made to predict effects accurately; however, this is inherently challenging given the high-level nature of the options under consideration. The ability to predict effects accurately is also limited by understanding of the baseline (now and in the future under a 'no plan' scenario). In light of this, there is a need to make considerable assumptions regarding how scenarios will be implemented 'on the ground' and what the effect on particular receptors would be. Where there is a need to rely on assumptions in order to reach a conclusion on a 'significant effect' this is made explicit in the appraisal text.

It is important to note that effects are predicted considering the criteria presented within Regulations. So, for example, account is taken of the duration, frequency, and reversibility of effects. Cumulative effects are also considered (effects of the plan in combination with the effects of other planned or on-going activity that are outside the control of Monmouthshire County Council).

Based on the evidence available a judgement is made if there is likely to be a significant effect. Where it is not possible to predict likely significant effects on the basis of reasonable assumptions, efforts are made to comment on the relative merits of the alternatives in more general terms and to indicate a rank of preference. The number indicates the rank and does not have any bearing on likely significant effects. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of 'significant effects'. For example, if an option is ranked as 1 then it is judged to perform better against that ISA topic compared to an option that is ranked 2 or 3 and so on.

Table AC.1: Location of growth options

Option	Description
Option 1 – Continuation of the existing LDP Strategy	Growth would be distributed development around the County with a particular focus on Main Towns, with some development in Severnside and some development in the most sustainable rural areas to enable provision of affordable housing throughout the County. New residential development would be accompanied by new employment opportunities, where possible.
Option 2 – Distribute growth proportionately across the County's most sustainable settlements	Growth, including jobs and affordable housing, would be distributed across the County's most sustainable settlements, with the level of growth proportionate to that settlement's size and amenities, affordable housing need as identified in the LHMA, the capacity for growth and/or the need for development to sustain the community.
Option 3 – Focus growth on the M4 corridor	Growth would be predominately located in the South of the County in the Severnside area close to the M4/M48, to capitalise on its strategic links to the Cardiff Capital Region and South West England, existing economic opportunities and regional infrastructure connections, including via the South Wales Main rail line at Severn Tunnel Junction. Affordable Housing would be directed to those sustainable areas in the south of the County identified in the LHMA as having the greatest housing.
Option 4 – Focus growth in the north of the County	Growth would be predominantly located in the most sustainable Settlements within the North of the County to capitalise on its strategic links to the Heads of the Valleys and wider Cardiff Capital Region via the A465, and towards Herefordshire via the A449 and A40, along with rail links to Newport, Cardiff and the North via the Welsh Marches line. Affordable Housing would be directed to those sustainable areas in the north of the County identified in the LHMA as having the greatest housing.

Economy and employment

Options	Option 1 – Existing LDP Strategy	Option 2 – Proportionate growth	Option 3 – Focus on M4 corridor	Option 4 – Focus in north of County
Rank	1	1	2	2
Significant effect?	Yes - Positive	Yes - Positive	Uncertain	Uncertain

Monmouthshire's increasing ageing population and shrinking working age population is currently limiting employment growth throughout the County. This is exacerbated by limited job opportunities and limited public transport, particularly in rural areas, making it harder to access jobs, services and facilities.

Abergavenny, Caldicot, Chepstow, Magor Undy, Monmouth, Raglan and Usk, all provide a range of employment opportunities, which is evidenced by their higher levels of self-containment.[32] The level of self-containment is a useful indicator of the number of people who live and work within the same settlement; providing significant potential for sustainable travel. Opportunities to maximise the self-containment of these settlements are more likely to be taken through Options 1 and 2 by focussing housing and employment growth towards these settlements. This will strengthen the local economy, ensuring an appropriate economic base to enable younger people to live and work locally within the County. It is considered that positive effects in this respect are also anticipated through all other Options; however, lower growth at these settlements may reduce positive effects in terms of promoting economic growth in the County's key centres.

Option 3 will lead to positive effects through responding to the recent removal of the Severn Bridge Tolls and the ambitions and opportunities associated with the Cardiff Capital Region City Deal and the South East Wales Metro. It seeks to capitalise upon the continuing economic growth of the Bristol/ South West region and the opportunities for Monmouthshire as a border County and its location between the 'Great Western Cities'. Directing growth close to the M4/ M48 will therefore provide residents with good access to economic opportunities throughout the region, utilising the infrastructure connections to the South of the County. In this context, it is recognised that the main concentrations of employment outside of the Primary Settlements are in the Severnside area, with the Primary Settlements and Severnside accounting between them for nearly 72% of all employment.[33] Directing growth to the South of the County therefore has the potential to deliver long term positive effects against this ISA theme.

[32] Monmouthshire County Council (2019) Sustainable Settlement Appraisal (Draft) Update reference
[33] Business Register and Employment Survey 2017

Option 4 will, conversely, lead to positive effects through focussing growth in the most sustainable Settlements in the North of the County, capitalising upon its strategic links to the Heads of the Valleys. Like Option 3, Option 4 also seeks to take advantage of the wider Cardiff Capital Region via the A465, and towards Herefordshire via the A449 and A40, along with rail links to Newport, Cardiff and the North via the Welsh Marches line. Targeted growth in the North of the County therefore has the potential to lead to increased levels of self-containment, supporting sustainable communities at the most sustainable Settlements of North Monmouthshire. However, it is recognised that within Options 3 and 4, concentrating growth in either the South or North of the County would result in limited employment opportunities outside these areas, which would exacerbate existing high levels of out-commuting in other settlements (i.e. Abergavenny/ Llanfoist, Chepstow and Monmouth under Option 3, and Chepstow, Usk and Severnside under Option 4). Additionally, this may limit economic growth in the wider County and exacerbate existing demographic issues.

Another key issue for the County is the changing role of high streets. Changing shopping habits, the use of out of town retail centres and increased levels of internet shopping has resulted in increased vacancy rates in some of the County's main retail centres such as Abergavenny; impacting on local economic growth. The ongoing pandemic has also highlighted the importance of high streets and the need to protect the role and function of the high street in the local community. Technical Advice Note 4 (TAN 4) reiterates the important role that retail and commercial centres play in creating sustainable locations, seeking to ensure they have a positive future. It states that *"…good access to and within, retail and commercial centres is key, both to the vibrancy of those places and to ensure that everyone in society has access to the wide variety of goods and services."* Options 1 and 2 will lead to positive effects in this respect, through supporting the existing centres; protecting their vitality and viability through increasing footfall, and supporting existing/ attracting additional facilities, in the main county towns. Conversely, Options 3 and 4 which direct growth towards certain centres and not others may further the trend of increasing vacancy rates on those centres where growth is not focussed, leading to negative effects against this ISA theme. Specifically, long term positive effects are anticipated where options support the regeneration of the County's main centres. Investing in existing centres through Options 1 and 2 will likely retain retail expenditure and attract inward investment, adapting positively to the changing role of the high streets throughout the County.[34]

Tourism plays a significant role in the Monmouthshire economy, particularly in assisting in rural diversification. The County's historic town centres also attract tourists. All of the options could have a positive effect on tourism with Options 1 and 2 performing more strongly as growth is also directed to rural areas across the County.

Overall, Options 1, and 2 are likely to lead to positive effects of greatest significance; facilitating sustainable growth in accordance with the settlement hierarchy, addressing localised economic issues and supporting a well-connected diverse economy. There are some small differences between Options 1 and 2 in terms of how growth is distributed during the Plan period, but these differences are not significant

[34] Monmouthshire Retail Background Paper, 2018

enough to warrant one option being ranked higher or lower than the other. Comparatively Options 3 and 4 perform less well given they focus growth in one area of the County to the potential detriment of the other.

Population and communities

Options	Option 1 – Existing LDP Strategy	Option 2 – Proportionate growth	Option 3 – Focus on M4 corridor	Option 4 – Focus in north of County
Rank	1	1	3	2
Significant effect?	Yes - Positive	Yes - Positive	Uncertain	Uncertain

As a result of in-migration the population of Monmouthshire has shown a steady increase over a ten year period to 2011; the County has a negative natural change. All Options perform positively in terms of providing housing to meet the identified needs of the County, with Options 1 and 2 best performing in this respect. Options 1 and 2 would provide affordable housing throughout the settlement hierarchy, ensuring a range and choice of homes are delivered, particularly where there is a need for affordable housing, to assist in regaining a balanced population. In terms of Options 3 and 4, housing will be delivered to either the South of the County (Option 3) or the North of the County (Option 4) only, resulting in needs not being met across all housing market areas. Additionally, there is a need to consider the potential impact on house prices arising in this context, given the delivery of affordable homes will be focussed in either the South or the North, and not meet needs more widely.

In terms of addressing the wider needs of communities, Options 1 and 2 will deliver long term positive effects through focussing the majority of growth at the Primary Settlements and Severnside. It is considered that facilitating the provision of increased accessible services in these urban areas, supported by connective infrastructure, will meet local needs, recognising the role of these settlements as service hubs for their rural hinterlands. This will contribute positively towards encouraging younger people to reside in the County, and addressing issues surrounding accessibility for elderly residents. A level of housing will also be provided under Options 1 and 2 in Secondary Settlements, the Severnside area and some of the Rural Settlements. The Secondary Settlements offer services of a more local nature aimed at meeting the daily needs of their inhabitants and those living in the surrounding areas, while outside of these settlements are a large number of smaller settlements with a limited offer in terms of services and facilities. It is therefore recognised that delivering higher growth to these smaller rural settlements through Options 1 and 2 may place additional pressure on existing social infrastructure at these locations; notably health care facilities unless supported by new or enhanced infrastructure capacity.

Option 3 will lead to positive effects through capitalising upon the recent removal of the Severn Bridge Tolls and the ambitions and opportunities associated with the Cardiff Capital Region City Deal and the South East Wales Metro. Utilising these strategic economic links

will contribute positively towards delivering sustainable communities, achieving infrastructure improvements/ provision in the South of the County. Similarly, Option 4 will lead to positive effects through capitalising upon its strategic links to the Heads of the Valleys and wider Cardiff Capital Region via the A465, and towards Herefordshire via the A449 and A40, along with rail links to Newport, Cardiff and the North via the Welsh Marches line. Utilising these strategic economic links will contribute positively towards delivering sustainable communities, achieving infrastructure improvements/ provision in the North of the County.

However, concentrating growth in the South (Option 3) or the North (Option 4) would also result in limited investment in infrastructure/ facilities outside the targeted locations, which would exacerbate existing reliance on the car and high levels of out-commuting in other areas (i.e. Abergavenny/ Llanfoist, Chepstow and Monmouth under Option 3 and Chepstow, Caldicot, Usk and Magor under Option 4). Additionally, through Options 3 and 4, existing centres outside of the key development areas (namely the Severnside area (Option 3) and the most sustainable Settlements to the North (Option 4)) would not be supported, resulting in limited growth at these settlements. Rural areas in particular will be disadvantaged as they would not benefit from additional housing to help support existing facilities or attract additional facilities.

Consideration must also be given to the recent publication of the Future Wales The National Plan 2040 (Working Draft National Development Framework (NDF)) which indicates a desire to designate a Green Belt *"around Newport and eastern parts of the region".* This is anticipated to include a large part of South Monmouthshire which may constrain future growth to some extent in this part of the County,although it is recognised that no main towns are considered to be within the Green Belt. Option 4 would accord with the direction of the Future Wales document, and therefore performs positively in terms of facilitating growth consistent with emerging National policy. Conversely the delivery of Option 3 would lead to negative effects; conflicting substantially with the Future Wales document through directing growth to the south where the Green Belt has been proposed. As all other Options seek to disperse growth throughout the County, and a defined location has not yet been established for the Green Belt, it is difficult to make any definitive conclusions on the nature and significance of effects at this stage.

Overall, Options 1 and 2 are considered to perform best as they provide sufficient housing and employment opportunities to meet identified housing and economic growth needs throughout the County. Further the options distribute housing in line with the settlement hierarchy, helping to meet the needs of all communities. There are some small differences between Options 1 and 2 in terms of how growth is distributed during the Plan period, but these differences are not significant enough to warrant one option being ranked higher or lower than the other. Comparatively Option 4 and in particular 3 perform less well due to the focus of growth in either the North or South of the County.

Health and wellbeing

Options	Option 1 – Existing LDP Strategy	Option 2 – Proportionate growth	Option 3 – Focus on M4 corridor	Option 4 – Focus in north of County
Rank	1	1	4	3
Significant effect?	Yes - Positive	Yes - Positive	Uncertain	Uncertain

In terms of improving the health and wellbeing of residents, Option 1 and 2 are anticipated to lead to long term positive effects through supporting and sustaining a hierarchy of vibrant town and village centres across the County. It is considered that the focus of growth in the Primary Settlements of Abergavenny, Chepstow and Monmouth, and Severnside settlements, would ensure sustainable access to a range of community services and facilities, including health, leisure and recreation; notably three of the four leisure centres in Monmouthshire are located in these Primary Settlements. Positive effects are therefore anticipated in terms of improving physical and mental health and wellbeing by encouraging healthier lifestyles, quality living environments and community cohesion. Positive effects in this respect are also anticipated through Option 4; however, the level of growth directed towards these settlements is likely to be less.

Whilst growth may place additional pressures on healthcare facilities, it is recognised that recent healthcare developments, such as the new critical care hospital in Cwmbran provides opportunities to support growth with enhanced sustainable healthcare care access in and around this location. Such opportunities are more likely to be capitalised upon under Options 1 and 2.

The delivery of Option 3 and Option 4 present the opportunity to capitalise upon regional infrastructure connections, and are considered to be well located in terms of access to health services. In this context, under Option 3 residents would be a reasonable distance from the Royal Gwent Hospital in Newport and the new critical care hospital in Cwmbran. Chepstow Community Hospital is also accessible, located to the east of the M4 corridor/ Severnside. Under Option 4, residents would also have good access to Nevill Hall Hospital. Through capitalising upon the strategic links to the Cardiff Capital Region and the provisions of the Capital Region Deal, Option 3 and Option 4 may also provide opportunity for achieving infrastructure improvements/ provision in the South of the County through Option 3, and the North of the County through Option 4, building more sustainable communities. However, under both Options, infrastructure provision would be limited in the rest of the County, which may exacerbate the existing deficiencies seen in many locations in relation to community and recreational facilities. This may contribute to rural isolation in certain areas; notably within smaller rural settlements outside of North Monmouthshire under Option 4.

All options have the potential to increase opportunities for healthy living by protecting and enhancing provision of multi-functional Green Infrastructure, public open space and recreation. The value and importance of having access to locally accessible open/ green spaces to

assist in recreation and health and wellbeing has been heightened during the current pandemic and should be reflected in growth strategies. Options 1 and 2 perform most positively in this respect as growth (and therefore green infrastructure provision) is delivered throughout Monmouthshire, aiding ecological connectivity throughout the County. This is compared to Options 3 and 4 which focus development to the South and North of the County respectively.

Given the rural nature of the County, it is considered that all options will lead to positive effects in terms of providing residents with access to the countryside; although the quality of this access may differ. Options 1 and 2 perform most positively in this respect as they direct a significant level of growth to Abergavenny which is located in close proximity to the Brecon Beacons National Park, and Monmouth and Chepstow which are located in close proximity to the Wye Valley National Landscape. Significant growth at these locations will provide access to these valued natural spaces, supporting the mental and physical health and wellbeing of residents.

Overall, it is considered that all Options provide a significant opportunity to deliver improvements to social/ community infrastructure. The level of infrastructure delivery is expected to be similar under all options; however, Options 3 and 4 perform less positively compared to Options 1 and 2 given the focus of growth to only the South or North of the County. All Options also provide an opportunity to deliver new and improved areas of multi-functional Green Infrastructure alongside development, and promote access to the countryside, which has become increasingly important in light of the current pandemic. Options 1 and 2 are best performing in this respect given the direction of growth towards more areas of higher accessibility, and more dispersed growth with new provisions benefitting more areas.

Equalities, diversity, and social inclusion

Options	Option 1 – Existing LDP Strategy	Option 2 – Proportionate growth	Option 3 – Focus on M4 corridor	Option 4 – Focus in north of County
Rank	1	1	2	2
Significant effect?	Yes - Positive	Yes - Positive	Uncertain	Uncertain

At the time of the 2014 Welsh Index of Multiple Deprivation (WIMD) none of the 56 lower super output areas (LSOAs) in Monmouthshire were in the most deprived 10% (Ranks 1-191) in Wales or the most deprived 20% (Ranks 1-382) in Wales. However, the 2019 WIMD now shows that alongside 20 LSOAs in the 50% most deprived (doubled since 2014), 5 LSOAs were in the 30% most deprived, and 2 LSOAs were in the 20% most deprived. Almost half (47%) of the total population live in wards defined as being in rural areas (i.e. with a population of less than 10,000). Population densities are, as would be expected, highest in the towns, with the majority of rural wards having low population densities when compared to national averages. Therefore Option 1 and 2 which seek to focus growth towards Primary Settlements are anticipated to lead to long term positive effects in terms of providing increased opportunities through employment and

housing provision for the younger population to live and work in Monmouthshire; enhancing the service roles of these settlements. The current pandemic has demonstrated the importance of ensuring communities are balanced and socially sustainable, particularly in terms of demography. Option 1 and 2 will also lead to positive effects through reducing inequalities between rural and urban areas; supporting and sustaining a hierarchy of vibrant centres across the County.

Option 3, through capitalising upon the strategic links to the Cardiff Capital Region (CCR) and the provisions of the CCR City Deal, would likely provide opportunity for building more sustainable communities and achieving infrastructure improvements/ provision in the South of the County. However, this limits opportunities for sustainable development in the Primary, Secondary and rural settlements in the rest of the County, which may lead to increased levels of inequality throughout Monmouthshire. Additionally, it is considered that if mixed-development is not prioritised and successfully utilised through Option 3, there will be a risk of exacerbating existing problems of lack of social and community facilities in rural locations, and high levels of out-commuting in Severnside. This option could lead to rural isolation. Similar effects are anticipated through the delivery of Option 4, given development would be located at the most sustainable Settlements within the North of the County to capitalise on its strategic links to the Heads of the Valleys and wider Cardiff Capital Region via the A465, and towards Herefordshire via the A449 and A40, along with rail links to Newport, Cardiff and the North via the Welsh Marches line. Growth in the North of the County would provide access to employment, retail, community facilities and social infrastructure, building sustainable communities through the provision of homes and jobs and improved levels of self-containment. However, through Option 4 housing would only be directed to the North of the County and would not address need in other areas across the County; likely impacting upon Monmouthshire's demography, leading to inequality across the County. This would likely impact on the sustainability of existing rural areas as no additional growth would be provided to help maintain/ support rural facilities, or attract additional rural employment opportunities. This option could also lead to rural isolation.

Monmouthshire's population profile in terms of ethnic groups is different to both the Wales average and that of the South East Wales region as a whole. At the time of the 2021 census, 96.9% of Monmouthshire's population classified themselves as white, compared to 93.8% in Wales.[35] The South East Wales figures are particularly influenced by the population profile of Cardiff which accounts for over 25% of the population of the region, and as would be expected the population profile is much more diverse in the city. Directing growth to the South of the County through Option 3 may contribute positively towards increasing the ethnic diversity within the County. In this context, utilising strategic links to the Cardiff Capital Region and South West England will likely support cross-boundary community cohesion, and capitalise upon regional social infrastructure connections. Positive effects are also identified in this respect in relation to Option 4, given there is the potential to develop links from Abergavenny to the wider Cardiff Capital Region.

Overall, Options 1 and 2 are preferred as they seek to support and sustain a hierarchy of vibrant centres across the County, directing the majority of the growth to the most sustainable settlements while also still delivering growth in the secondary settlements and rural areas.

[35] ONS Census 2021 'Build a custom area profile' can be accessed via https://www.ons.gov.uk/visualisations/customprofiles/build/

This will likely positively address existing demographic issues, encouraging younger people to reside and work in the County. They are also anticipated to lead to positive effects in this respect, delivering affordable housing in both urban and rural areas and where there is greatest need. There are some small differences between Options 1 and 2 in terms of how growth is distributed during the Plan period, but these differences are not significant enough to warrant one option being ranked higher or lower than the other. While Option 3 and Option 4 may support more sustainable communities and achieve social infrastructure improvements/ provision in the South and North of the County respectively, these options perform least well due to the likely isolation of communities and continuation of imbalanced demographic profile across Monmouthshire.

Transport and movement

Options	Option 1 – Existing LDP Strategy	Option 2 – Proportionate growth	Option 3 – Focus on M4 corridor	Option 4 – Focus in north of County
Rank	1	1	2	3
Significant effect?	Uncertain	Uncertain	Uncertain	Uncertain

Existing travel patterns in Monmouthshire reflect its rural nature; with a trend of relatively long travel to work distances, high levels of car ownership and reliance on the private car. Specifically, in 2021 52.4% of the resident population of Monmouthshire were travelling to work by car or van, compared to 56.5% in Wales.[36] The primary points of road congestion in the region are on the M4, with regular issues of congestion near Newport reflecting the high commuter levels; affecting connectivity between Monmouthshire and Cardiff.[37] However, it is recognised that the recent increase in home-working as a result of the current pandemic is likely to continue over the longer term which will likely support reduced commuting levels and congestion in the future.

While focusing growth along the M4 corridor through Option 3 may intensify traffic levels, it also has the potential to link housing and employment growth, utilising links to the M4 corridor and the removal of the Severn Bridge Tolls. This would reduce the need to travel by car, capitalising upon existing sustainable transport links such as rail at Caldicot and Severn Tunnel Junction Train Stations; and forthcoming improvements such as the ambitions and opportunities associated with the Cardiff Capital Region City Deal and the South East Wales Metro. The Metro will provide an opportunity for alternative sustainable travel; providing faster, more frequent and joined-up services using trains, buses and light rail.[38] Notably, the Regional Bus Rapid Transit will provide a west-east connection that will complement north-

[36] ONS Census 2021 'Build a custom area profile' can be accessed via https://www.ons.gov.uk/visualisations/customprofiles/build/
[37] Monmouthshire County Council (2015) Monmouthshire Local Transport Plan [online] available at: https://www.monmouthshire.gov.uk/local-transport-plan/
[38] Welsh Government (2018) Rolling out our Metro https://gov.wales/sites/default/files/publications/2018-06/south-wales-metro-brochure.pdf

south travel connectivity provided by the railway lines, and provide residents with direct access to economic opportunities located in the Heads of the Valleys corridor.

Positive effects are also anticipated in this respect but to a lesser extent through Option 4, which seeks to predominantly locate growth in most sustainable Settlements within the North of the County. This is with the ambition to capitalise on strategic links to the Heads of the Valleys and wider Cardiff Capital Region via the A465, and towards Herefordshire via the A449 and A40 along with rail links to Newport, Cardiff and the North via the Welsh Marches line. However, lack of development outside of the Severnside area through Option 3, and outside of the most sustainable Settlements in the North through Option 4, would not generate sufficient infrastructure improvements and gains in other areas across Monmouthshire. This would likely exacerbate out-commuting in other areas and would not assist in improving self-containment of the main County towns outside the targeted growth areas (i.e. Abergavenny, Chepstow and Monmouth under Option 3, and Chepstow, and Severnside under Option 4).

In terms of sustainable transport options available throughout the County, buses are most predominant, with the County being served by both local and national routes. The Primary Settlements of Abergavenny, Chepstow and Monmouth all have bus stations with hourly (or more frequent) services extending to the surrounding towns and villages and to the sub-region, including Bristol, Gloucester, Hereford, Newport and Cardiff. In terms of rail provision, Monmouthshire has four railway stations, Caldicot, Chepstow and Severn Tunnel Junction in the South of the County and Abergavenny in the North. The centre and north east of the County are poorly served for rail travel. Options 1 and 2 will therefore lead to long-term positive effects through directing growth to these Primary Settlements, capitalising upon the sustainable transport offer and supporting lower levels of car use.[39]

The Public Rights of Way (PRoW) network is generally good throughout Monmouthshire; with some localised fragmentation, notably in the rural areas. There are also two national cycle routes within the County, both of these run from Chepstow; number 4 - The Celtic Trail (Severn Bridge to Pembrokeshire) and number 42 (Chepstow to Glasbury, Powys).

The Active Travel (Wales) Act (2013) requires local authorities in Wales to deliver year on year improvements in active travel routes and facilities. As such, Monmouthshire has prepared a series of Integrated Network Maps (INMs) which set out the Council's plans for improving active travel routes in and around certain settlements over the next 15 years. At the time of preparation, the guidance stated that the settlements should have had a population of at least 2,000 at the time of the 2001 Census. For Monmouthshire this included the settlements of Abergavenny, Caldicot, Chepstow, Magor Undy, Monmouth and Usk. However, there are existing active travel routes in smaller settlements. The maps produced show proposed future networks of key walking and cycling routes, and include schemes for

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[39] Welsh Government (2018) Rolling out our Metro https://gov.wales/sites/default/files/publications/2018-06/south-wales-metro-brochure.pdf

delivery in the next couple of years, schemes for delivery in the medium term (5-10 years), and longer-term (10-15 years) proposals of a more aspirational nature. The INMs were submitted to Welsh Government on 27 February 2018 and these have now been approved.[40]

Options 1 and 2 focus development at settlements that provide the best current and future opportunities for achieving sustainable development; which offer a choice of transport modes and contribute towards the development of a sustainable transport network. New development will likely capitalise upon existing transport infrastructure at these locations, further promoting active travel and integrated sustainable transport opportunities. Additionally, it is considered that delivering jobs and homes in these locations will likely support levels of self-containment, reducing the reliance on the car for employment.

Despite the likelihood that higher levels of homeworking will prevail following the current pandemic, there is no guarantee that all residents will live and work in the same area, and a proportion are likely to continue the trend of out-commuting by car for journeys (recognising that currently only 1.2% of Monmouthshire resident working population travel to their place of work using public transport).[41] Congestion is notably an issue of concern in Chepstow (given the Air Quality Management Area [AQMA] present) where a large proportion of growth through Option 1 and 2 is targeted. This presents a challenge for development, as there is significant risk that this trend would be intensified.

An appropriate amount of development is also allocated through Options 1 and 2 to Severnside; with a lower level of growth to the County's secondary settlements and rural areas, recognising that in many rural areas there is often no accessible sustainable transport offer. Infrastructure provision is notably lacking in rural areas in the North of the County, and it is recognised that a Welsh Government (and subsequent Local Transport Plan (2015)) priority is to *"maximise the contribution that effective and affordable transport services can make to tackling poverty and target investment to support improvements in accessibility for the most disadvantaged communities".* It is noted that this has been partly addressed by the introduction of a 'grass routes' bus service[42], which might be utilised through Option 2 supporting the growth of rural communities. However, further improvements to accessibility in these settlements are unlikely to be achieved as growth would not be of a critical mass to support significant infrastructure delivery. Directing growth to the rural settlements will therefore likely promote unsustainable travel patterns, with (despite a likely higher level of homeworking) a proportion of residents continuing to travel by car to existing centres to access services and employment.

It is recognised that all Options have the potential to contribute positively towards the Welsh Government's commitment to reducing reliance on the private car and supporting the transport hierarchy and a modal shift to walking, cycling and public transport (Planning Policy Wales, Edition 10). However, Options 1 and 2 are identified as best performing through directing growth to the Primary Settlements, which are all

[40] Monmouthshire County Council (2020): Sustainable Settlement Appraisal can be accessed via https://democracy.monmouthshire.gov.uk/documents/s26562/Appendix%201%20Sustainable%20Settlement%20Appraisal%20March%202020.pdf
[41] ONS Census 2021 'Build a custom area profile' can be accessed via https://www.ons.gov.uk/visualisations/customprofiles/build/
[42] A demand responsive bus service available during the week for all residents of Monmouthshire and accommodation providers who are members of the scheme

multi-modal transport hubs that benefit from active travel routes, existing railway stations (at Abergavenny and Chepstow only) and frequent bus services. The Primary Settlements are also well placed geographically to take advantage of the strategic road network in the County. These options are therefore most likely to promote a safe, efficient, accessible and sustainable transport system that supports self-containment at the Primary Settlements; providing opportunities for walking and cycling and encouraging active travel. There are some small differences between Options 1 and 2 in terms of how growth is distributed during the Plan period, but these differences are not significant enough to warrant one option being ranked higher or lower than the other.

Option 3 will lead to long term positive effects through building more sustainable communities and achieving transport improvements/ provision in the South of the County, while Option 4 will lead to long term positive effects through building more sustainable communities and achieving transport improvements/ provision in the North of the County. However, this would be at the expense of the remainder of the County, exacerbating out-commuting and private vehicle use in other areas. At this stage the potential effects are considered to be uncertain until further evidence base work is carried out relating to the impacts of growth on the highway network.

Natural resources (air, land, minerals, and water)

Options	Option 1 – Existing LDP Strategy	Option 2 – Proportionate growth	Option 3 – Focus on M4 corridor	Option 4 – Focus in north of County
Rank	1	1	3	2
Significant effect?	Yes - Negative	Yes - Negative	Yes - Negative	Yes - Negative

In terms of air quality, while this is not a significant issue for the County, it is nonetheless recognised that air pollution is a major cause of death and disease globally.[43] The greatest problems associated with air quality in the County are caused by vehicle emissions; evidenced by the two Air Quality Management Areas (AQMAs) declared at Primary Settlement Chepstow and Secondary Settlement Usk for NO_2.[44] Directing growth to these locations through Options 1 and 2 (and to a lesser extent Option 3) has the potential to exacerbate existing air quality issues through increased road users and subsequent increased levels of congestion. Notably, Chepstow AQMA includes the A48, between the roundabout with the A466, which would likely be utilised by commuters. The Air Quality Action Plans for both areas contain many transport-related measures, and these have been taken account through the development of the LTP (2015).[45] In accordance with the LTP and higher level policy frameworks, Options are anticipated to deliver mitigation where possible; ensuring the location of new

[43] World Health Organisation (2022) Ambient (outdoor) air pollution https://www.who.int/news-room/fact-sheets/detail/ambient-(outdoor)-air-quality-and-health
[44] Air Quality in Wales (no date) Air Quality Management Areas https://airquality.gov.wales/laqm/air-quality-management-areas
[45] Monmouthshire County Council (2015) Monmouthshire Local Transport Plan [online] available at: https://www.monmouthshire.gov.uk/local-transport-plan/

development does not worsen conditions in the AQMAs, or result in the declaration of new ones. Further, the pandemic has resulted in higher levels of homeworking which are likely to prevail in the longer-term, reducing congestion pressures on air quality. In this context, Options 1 and 2 will likely further support the increased use of sustainable transport and reduced reliance on the private vehicle through delivering homes that are well located to services, facilities and employment in existing centres.

Delivering under all Options has the potential to lead to positive effects through capitalising upon the strategic links to the Cardiff Capital Region and the provisions of the CCR City Deal. The Capital Region is committed to a low carbon future, delivering healthier and sustainable travel options, which would likely provide opportunity for building more sustainable communities and improved air quality.

There is a limited supply of brownfield land in the County, with the average percentage of housing completions on brownfield land over years totalling approximately 48.4%.[46] The lack of brownfield land in the urban areas is a concern for the RLDP, with limited opportunities existing in the Primary Settlements only. Options 1 and 2 are therefore best performing in this respect, as while growth is likely to be predominately greenfield development, brownfield land within the Primary Settlements will be utilised where possible. Option 4 seeks to deliver growth to the most sustainable Settlements in the North, which includes Monmouth and Abergavenny, in addition to Raglan; a Secondary Settlement. A significant proportion of development under Option 4 is therefore likely to be on greenfield land. Option 3 is also considered to lead to long term significant effects as there are limited opportunities for brownfield development in the Severnside area, with development likely to be predominately on greenfield land.

Monmouthshire has a significantly high percentage of best and most versatile agricultural land (i.e. Grade 1, 2 or 3a). While there is a need to conserve these resources, there are limited opportunities within the County for development on lower grades of agricultural land (i.e. Grade 3b, 4 and 5). All options are therefore likely to result in the loss of some areas of BMV agricultural land, leading to significant long term negative effects against this ISA theme. The Predictive ALC model for Wales (2017) is based on the principles of the Agricultural Land Classification System of England & Wales, the Revised Guidelines & Criteria for Grading the Quality of Agricultural Land (MAFF 1988).[47] This data model allows you to predict the distribution of BMV land throughout the County, and in relation to key areas as set out in the settlement hierarchy:

- **Primary Settlements** are predominately urban centres, with areas of Grade 3a land located to the east of Abergavenny and integrated between the main urban area throughout Monmouth. Interspersed areas of high quality Grade 2 land and non-agricultural land are present around Chepstow.

[46] Monmouthshire Housing Land Availability Surveys 2008-2018
[47] http://lle.gov.wales/map/alc#m=-2.7235,51.59785,14&b=europa&l=908h;893h;1326,0.37;

- **Secondary Settlements** include significant areas of BMV land; areas of Grade 3a land surround Usk (notably to the south). North east/ and north west of Penperlleni and north/ north east of Raglan are areas of Grade 3a land. Grade 2 and 3b land is dispersed outside of Raglan's urban area.
- **Severnside** is particularly constrained by Grade 2 and Grade 1 land, surrounding the M4. Significantly constrained areas include the entirety of Crick, and large areas within Caerwent, between Rogiet and Magor/ Undy, and north of Sudbrook.
- **Rural settlements** have not yet been defined[48]; however, it is recognised that outside of the main settlements there is a significant amount of BMV agricultural land, reflecting the rural nature of the County.

In terms of the Options, it is therefore considered that directing growth to the existing main settlements through Options 1 and 2 will help to protect best and most versatile agricultural land in the rural areas. Option 4 is also anticipated to perform well in this respect, given growth is directed to the primary settlements of Abergavenny and Monmouth, and the secondary settlement of Raglan. However, it is recognised that there are limited opportunities for brownfield development within the County's existing urban areas, and that the delivery of all Options would inevitably lead to loss of greenfield land, as discussed above. Nonetheless it is considered that residual loss may be less significant under Option 4 as the settlements in the North are not identified as being significantly constrained in terms of BMV land. Given the extent of BMV land surrounding Severnside and the M4 corridor, it is considered that Option 3 will lead to significant long term negative effects through inevitable permanent loss of BMV land.

While mineral extraction plays a limited role in Monmouthshire's economy, there remains a need to safeguard the County's mineral resources in order to make an appropriate contribution to the sustainable supply of aggregates to the wider South Wales economy. Development would be located away from safeguarded areas under Options 1, 2 and 4. Due to the focus of development in the South of the County through Option 3, this Option has the potential to adversely impact upon the Limestone Mineral Safeguarding Area present. Option 3 is therefore worst performing in this respect. The Options are considered to lead to neutral effects in terms of waste, as it is considered that all of them are capable of being served by appropriate waste infrastructure.

Water is supplied to Monmouthshire by the Dwr Cymru/Welsh Water (DCWW). They supply water via a large scale, multi-source, integrated network that is typical of many other water company areas. Monmouthshire falls within two Water Resource Zones (WRZs); Monmouth and the South East Wales Conjunctive Use System (SEWCUS). The Monmouth WRZ supplies the market town of Monmouth and the surrounding villages. The WRZ is heavily dependent on the Mayhill abstraction from the River Wye at Monmouth. There is also a spring abstraction at Ffynnon Gaer which supplies a small localised area south of Monmouth. The SEWCUS supplies the majority of the County, and a significant proportion of the South East Wales Region. In total, there are over 40 resources that are used to supply the SEWCUS WRZ, which include a mixture of river abstractions from the larger rivers in the east of the WRZ and relatively small upland reservoir

[48] Monmouthshire County Council (2022) Growth and Spatial Options Paper can be accessed via https://www.monmouthshire.gov.uk/app/uploads/2022/12/Growth-and-Spatial-Options-Paper-Sept-2022-1.pdf

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sources with small catchment areas. For both WRZs the total demand for water is forecast to remain relatively stable until 2030, with a decline in demand anticipated over the 2030-2050 planning period, and then to just 10% of current demands by 2050. Water companies are legally required to supply water to private consumers and businesses within their area. As set out in the Water Industry Act 1991, they must prepare and maintain a Water Resources Management Plan (WRMP) that sets out how the company intends to maintain the balance between water supply and demand. Water companies update their WRMPs every 5 years to take account of predicted growth and ensure that there are schemes in place to meet future demands.

All Options are anticipated to deliver neutral effects in terms of impact on water resources, with no best performing Option identified. This is given the legal requirements in place for WRMPs, and that all Options are assumed to deliver the same level of growth throughout the Plan period. It is expected that development coming forward under any of the Options will be encouraged to be water efficient and may deliver mitigation (for example rain water harvesting measures) to support reduced water use per person per day. This is in accordance with PPW12 (2024) which outlines the contributions planning can make, including “ensuring resilient local choices for infrastructure and built development, taking into account water supplies, water quality and reducing, wherever possible, air and noise pollution and environmental risks, such as those posed by flood risk, coastal change, land contamination and instability.”

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Overall, while is difficult to identify any significant differences between the options in terms of water resources and quality, Options 1 and 2 followed by Option 4, are best performing in terms of utilising brownfield land and protecting BMV agricultural land, and ensuring that air quality is not reduced throughout the County. However, it is recognised that there are limited opportunities for the regeneration of brownfield land so ultimately the majority of growth will be on greenfield and potentially agricultural land. Option 3 performs least well given it may also lead to the loss of significant greenfield/BMV land and has the potential to adversely impact upon the Limestone Mineral Safeguarding Area present to the south of the County. All the Options have the potential for a significant negative effect against the natural resources theme through the potential loss of BMV agricultural land, although it is acknowledged that there is an element of uncertainty at this stage until the precise location of development is known.

Biodiversity and geodiversity

Options	Option 1 – Existing LDP Strategy	Option 2 – Proportionate growth	Option 3 – Focus on M4 corridor	Option 4 – Focus in north of County
Rank	2	2	1	3
Significant effect?	Yes – Negative	Yes - Negative	Uncertain	Yes - Negative

It is assumed that development proposed under any of the Options would not result in the loss of any international, national or locally designated sites for biodiversity. In terms of internationally designated biodiversity sites, the following are located within the County:

- **Severn Estuary** Special Protection Area (SPA), Special Area for Conservation (SAC), Ramsar Site, and Site of Special Scientific Interest (SSSI) is the largest coastal plain estuary in the UK with the second highest tidal range in the world. The site covers the southern extent of the County, and contains habitats listed under Annex I of the Habitats Directive. These include estuaries, mudflats and sandflats. In addition to Annex I habitats present, primary reasons for designation are species listed under Annex II of the Habitats Directive including Sea lamprey, River lamprey and Twaite shad.
  - Primary reasons for the SPA designation is that the site qualifies as an area of Internationally Important Assemblage of Birds, under Article 4.2, where over the winter the area regularly supports 84,317 waterfowl.
  - Primary reasons for Ramsar designation is that there are eight criterions that are within the Ramsar designation. This includes the immense tidal range creating diversity of the physical environment and biological communities, and due to unusual estuarine communities, reduced diversity and high productivity.
  - This site is also designated due to the importance for the run of migratory fish between sea and river via the estuary. It is also of particular importance for migratory birds during spring and autumn.
- **River Wye SAC** covers the length of the River Wye, to the north east of the County, notably extending through Monmouth. The SAC contains habitats listed under Annex I of the Habitats Directive and a variety of species listed under Annex II of the Habitats Directive which are also the primary reasons for designation. The River Wye is important for its population of Atlantic salmon, and whilst stocks have declined the salmon population is still of considerable importance in UK terms. The Wye also holds the densest and most well established otter population in Wales. The site is considered one of the best in the UK for white-clawed crayfish. Other important species supported by the River Wye are twaite shad, bullhead and river, sea and brook lamprey.
- **River Usk SAC** covers the length of the River Usk, to the west of the County, running through Abergavenny and Usk. The SAC contains habitats listed under Annex I of the Habitats Directive and a variety of species listed under Annex II of the Habitats Directive; that are

primary reason for designation. The River Usk SAC is part within the Brecon Beacons National Park Planning Area. **Wye Valley Woodlands SAC** is a large woodland SAC that straddles the Wales-England border, extending along the east of the County. The site is underpinned by nine SSSIs in Wales and seven in England. The Wye Valley contains abundant and near continuous semi-natural woodland along the gorge. The variety of woodland types found are rare within the UK.

- **Wye Valley and Forest of Dean Bat sites SAC** straddles the Wales-England border, extending along the east of the County. It is underpinned by four SSSIs in Wales and nine in England, all of which lie entirely within the SAC. This composite of sites contains the greatest concentration of lesser horseshoe bat in the UK, totalling about 26% of the national population.
- There are an additional four European Sites within the Brecon Beacon National Park which must also be considered. These are Coed y Cerrig SAC, Cwm Clydach Woodlands SAC, Sugar Loaf Woodlands SAC, and Usk Bat Sites SAC. Further to this, Llangorse Lake/ Llyn Syfaddan SAC, in Powys, and Aberbargoed Grassland SAC Caerphilly fall within 15km of Monmouthshire and therefore could possibly be affected by growth proposed through the RLDP. A full HRA is currently being undertaken in respect of the replacement Monmouthshire LDP.

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Additional development proposed through the RLDP is most likely to have impacts on the European sites discussed above through the loss and fragmentation of linear foraging habitats for bat species, atmospheric pollution, increased disturbance (recreation, noise and light), and through impact on water quality and resources. Both the River Wye SAC and the River Usk SAC are notably sensitive to increased nutrient loading, predominantly phosphates contributed from treated sewage effluent. Due to the increasing phosphate concentrations in both riverine systems, both Natural Resources Wales and Natural England have recently advised that development plans should not result in a net increase of phosphorus concentrations in both SACs, a concept known as nutrient neutrality. The HRA (2021) carried out for the RDLP concludes that potential residential or employment sites in Abergavenny and Monmouth are likely to have nutrient neutrality implications, because they are served by WwTWs discharging into the upper reaches of both SACs. The Chepstow and Severnside SGAs are served by Nash WwTW in Newport, which discharges into the Severn Estuary and therefore will not contribute phosphorus the River Wye and River Usk. More recent evidence shows there are solutions available at the WWTW's now, which will help to ensure no significant effects arise in relation to nutrient neutrality. It is recognised that the applicable options will require mitigation supported by RLDP policy provisions.

In terms of ranking the Options, it is considered that all Options are constrained to some extent by internationally designated sites. In this context, Option 3 has the potential to lead to negative effects on the Severn Estuary SAC given settlements such as Sudbrook within this Option are adjacent to the internationally designated site. Options 1, 2 and 4 have the potential to lead to negative effects on numerous internationally designated sites which extent throughout the Primary and Secondary Settlements. Notably the River Usk SAC passes through Abergavenny and Usk, the River Wye SAC passes through Chepstow and Monmouth, and Chepstow and Monmouth are also in close proximity of the Wye Valley Woodlands. As set out in the HRA (2021) development in Abergavenny and Monmouth is most likely to lead to nutrient neutrality implications with the potential for significant adverse effects on the SACs. Option 4 directs the highest level of

growth to these settlements, followed by Options 1 and 2, and therefore is worst performing in this respect overall. In terms of nationally designated sites, there are 50 SSSIs that fall wholly within the County. Most are woodland or grassland sites, with others designated for their wetland or geological interest, and a few designated for bat interest. It is noted that of these, 16 fall within the SACs listed above. Spatially, a significant proportion of the SSSIs are located to the north west of the County, within the Brecon Beacons National Park and surrounding Abergavenny. Growth directed to Abergavenny through Options 1, 2 and 4 therefore have the potential to adversely impact upon SSSIs; including Sugar Loaf Woodlands SSSI and Coed-Y-Person SSSI. Impacts are most likely to arise as a result of increased recreational disturbance. There is also a cluster of SSSIs to the east of the County around Monmouth, and dispersed in the rural landscape between Monmouth and Chepstow in the south, which may also be impacted by Options 1, 2 and 4 given growth is directed to these locations. Notably Fiddler's Elbow SSSI and Lady Park Wood SSSI are also the County's two National Nature Reserves (NNRs) and may be impacted by high growth at Monmouth.

There are also several SSSIs along the M4 corridor and to the southern extent of the County, including the Gwent Levels SSSI and component SSSIs under the Severn Estuary SAC as discussed above. Option 3 has the greatest likelihood for impacts on these SSSIs given the focus of development to the South of the County. Impacts are most likely to arise as a result of increased recreational disturbance, water pollution, and air pollution.[49]

All of the Options have the potential to impact nationally designated sites, the nature and significance of effects will ultimately depend on the precise location of development and the implementation of mitigation measures.

In terms of locally important biodiversity, there is just one Local Nature Reserve (LNR) designated within the County; Cleddon Bog. Cledden Bog LNR is located within the Wye Valley National Landscape in the rural landscape, and is not likely to be affected by any of the Options. Monmouthshire also includes approximately 650 Sites of Importance for Nature Conservation (SINCs) (also known as Local Wildlife Sites (LWSs). These predominantly relate to grassland and ancient and semi-natural woodland areas. SINCs are dispersed throughout the County, and it is considered that development coming forward under any of the Options could have localised impacts on these designed sites.

In addition to designated sites, all Options have the potential to result in adverse effects on biodiversity through loss of greenfield land and priority habitats. Habitat fragmentation is a key issue for the County; for example, fragmentation of hedgerows caused by development and canalised streams and rivers. Options 1 and 2 are likely to result in habitat loss and fragmentation across a wider area of the County whereas Options 3 and 4 are likely to have an effect of greater significance on a more localised area.

[49] Natural England (2015) Site Improvement Plan: Severn Estuary Mor Harfen http://publications.naturalengland.org.uk/publication/4590676519944192

Overall, it is considered that all Options have the potential to adversely impact upon the County's biodiversity resource, with the potential for significant residual negative effects. The focus of development in the Primary Settlements through Options 1, 2 and 4 will likely result in increased pressure on the environment, due to concentrating growth in locations around the existing main settlements in the North where a number of internationally/ nationally designated biodiversity sites are located. Notably, focussing growth at the Primary Settlements of Abergavenny and Monmouth through Option4 (and a lesser extent Options 1 and 2) have the potential to lead to nutrient neutrality implications within the River Wye and River Usk SACs. Option 4 and then Options 1 and 2 are therefore identified as worst performing overall. In terms of Option 3, a number of the smaller rural settlements and Severnside are also constrained at an international/ national level, and therefore the potential for adverse effects cannot be ruled out at this stage.

It is also recognised that all Options have the potential to deliver positive effects on biodiversity through enhancement measures. This is currently uncertain, and therefore at the County scale it is difficult to differentiate between the Options. Ultimately the nature and significance of effects will ultimately be dependent on the design/ layout of development as well as the implementation of mitigation measures.

Historic environment

Options	Option 1 – Existing LDP Strategy	Option 2 – Proportionate growth	Option 3 – Focus on M4 corridor	Option 4 – Focus in north of County
Rank	=	=	=	=
Significant effect?	**Uncertain**	**Uncertain**	**Uncertain**	**Uncertain**

There is one internationally designated site falling partially within the County; Blaenavon Industrial World Heritage Site (WHS), located to the west of Abergavenny. The WHS was inscribed by UNESCO in 2000 on account of its industrial landscape having Outstanding Universal Value (OUV). A Management Plan has been prepared for the period 2018-2023 a suite of policies for the continued effective protection, conservation, presentation and transmission of the Site's OUV.[50]

There are also a range of designated heritage assets and archaeological areas within the County:

- **31 Conservation Areas** including a range of areas from market towns, rural villages and medieval castles. The largest three Conservation Areas are Mathern (231.6ha), Llanarth (203.1ha) and Abergavenny (152.8ha). In addition to these three, there are

[50] Chris Blandford Associates (2018) Blaenavon Industrial Landscape World Heritage Site Management Plan 2018-2023 http://moderngov.torfaen.gov.uk/documents/s35685/Blaenavon%20WHS%20Management%20Plan%20FINAL%20SEPTEMBER%202018.pdf

Conservation Areas located in the remaining Primary and Secondary Settlements. There is a collection of Conservation Areas to the south of the County, including within numerous settlements along the M4 corridor, and within rural settlements along the eastern border of the County.

- **45 Historic Parks and Gardens** varying considerably in size and character, the largest of which are Chepstow Park and Piercefield Park, both located in Chepstow. Many Historic Parks and Gardens are located in Chepstow and the wider south east of the County, with others distributed throughout the settlement hierarchy and in the more rural settlements, notably south of Abergavenny and north west of Monmouth.
- **3 Landscapes of Outstanding Historic Interest** have been identified by CADW within the County – Blaenavon, the Gwent Levels and the Lower Wye Valley.
- **164 Scheduled Monuments** are widely dispersed across the County.
- **> 2,206 Listed Buildings** of which 2% are Grade I, 10% are Grade II * and 88% are Grade II. There are multiple Grade I listed buildings located within the Primary Settlements (notably five in Chepstow, four in Monmouth and two in Abergavenny - including the Abergavenny Castle Ruins within the town centre). Usk also has four Grade I listed buildings, including Usk Castle and its precincts. Of the Listed Buildings, 166 (7.5% of the stock) are identified as being 'at risk'. The four communities with the highest percentage of listed buildings at risk based on the number of buildings are:
  - St Arvans - 12 buildings
  - Tintern - 9 buildings
  - Rogiet - 4 buildings
  - Llanbadoc - 4 buildings
- **10 Archaeologically Sensitive Areas (ASAs)** of which the largest extends across the south of the County, covering Caldicot, Rogiet, Magor Undy, and the Gwent Levels. There are also ASAs present at each of the Primary Settlements, Usk and Raglan, and rural locations outside of the main settlements.

Given the volume of heritage assets located throughout the County, it is considered that all of the Options are likely have an impact on the historic environment. It is considered that growth focussed at the Primary Settlements in the North through Options 1, 2 and 4 will result in increased pressure on the rich historic environment present at these locations; including notably the WHS and its setting, extensive Conservation Areas (all of which contain numerous Listed Buildings), Registered Parks & Gardens, and Grade 1 Listed Buildings, at Abergavenny, Chepstow and Monmouth. Together with their settings, these heritage assets require protection and enhancement, in accordance with the WHS Management Plan (2018), Conservation Area Appraisals and requirements of Planning Policy Wales (2018). It is therefore considered that directing significant growth to these locations has the potential for negative effects of greater significance, and reflects a likely greater need for suitable mitigation in development strategies.

It is noted that the redevelopment of brownfield sites in the Primary Settlements, i.e. through Options 1 and 2, and to a lesser extent Option 4, has good potential for positive townscape improvements. In this context, where proposals seek to deliver good, high quality design and appropriate layout, this may lead to landscape/ townscape improvements and positive effects such as increased awareness and access. This however is uncertain at this stage, and it is recognised that the County has a limited offer of brownfield land.

In terms of Option 3 it is considered that the South of the County is also sensitive in terms of the historic environment. Notably constraints include the ASA which extends across the M4 corridor; Portskewett, Caldicot and Major/ Undy contain Grade I Listed Buildings; Rogiet contains four listed buildings at risk; the Gwent Levels Registered Landscape of Outstanding and of Special Interest covers areas of Caldicot, Undy and Magor; and there are numerous Conservation Areas present. Focussing growth to the South therefore has the potential to adversely impact upon archaeological and/ or historic assets, their settings and intrinsic qualities. As discussed for other Options, development also has the potential to deliver neutral/ positive effects through having a positive contribution to an area's character or appearance. It is also noted that directing growth to the South of the County will preserve the historic environment in the remainder of the County, maintaining the historic landscape and setting of towns and villages, and protecting settlement identity.

It is recognised that Monmouthshire's cultural assets also include the use of the Welsh language. None of the Options are considered likely to have a significant effect on the Welsh language, and it is therefore not possible to distinguish between the Options in this respect.

Overall, it is difficult to rank the Options in terms of preference against this ISA Objective as they are all predicted to have a residual significant effect as they direct development to areas that are sensitive in terms of the historic environment; albeit in different areas of the County. It is considered that the significance of effects will ultimately be dependent on the design/ layout of development as well as the implementation of mitigation measures.

Landscape

Options	Option 1 – Existing LDP Strategy	Option 2 – Proportionate growth	Option 3 – Focus on M4 corridor	Option 4 – Focus in north of County
Rank	2	2	1	2
Significant effect?	Uncertain	Uncertain	Uncertain	Uncertain

Monmouthshire has a rich and diverse landscape stretching from the coastline of the Gwent Levels in the south of the County, to the uplands of the Brecon Beacons in the north, and the river corridor of the Wye Valley in the east. In terms of nationally designated landscapes, the County incorporates:

- **Wye Valley National Landscape** located to the east of Monmouthshire. The part of the Wye Valley National Landscape located within Monmouthshire covers approximately 16% of the Monmouthshire LDP area.
- **Brecon Beacons National Park** located to the north west of Monmouthshire. The portion of the Brecon Beacons National Park (BBNP) located in Monmouthshire covers approximately 17% of the County.

In line with Planning Policy Wales (2024) it is recognised that the Wye Valley National Landscape and Brecon Beacons National Park are *"valued for their intrinsic contribution to a sense of place, and that their special characteristics should be protected and enhanced."* In addition to national policy requirements, protection is also provided to the Wye Valley through the Wye Valley AONB Management Plan (2021), which sets out five Development Strategic Objectives, underpinning the aim to *"Ensure all development within the AONB and its setting is compatible with the aims of AONB designation".* Notably, Objective WV-D2 seeks to *"encourage and support high standards of design, materials, energy efficiency, drainage and landscaping in all developments"*.[51] In terms of the Brecon Beacons National Park, there is an established Local Development Plan (LDP) in place and development management functions in the correlating part of the County. The LDP *"represents and defines the National Park Authority's approach for ensuring sustainable development is carried out in the National Park."*[52] While protection is provided at the higher level, it is nonetheless considered, given the level of growth proposed through all Options, that development has the potential to adversely impact upon special landscape features, character, and setting.

[51] Wye Valley AONB Joint Advisory Committee (2021) Wye Valley Area of Outstanding Natural Beauty (AONB) Management Plan 2021 - 2026 https://www.wyevalley-nl.org.uk/wp-content/uploads/Wye-Valley-AONB-Management-Plan-2021-26-finalised.pdf

[52] Brecon Beacons National Park Authority (2019) Brecon Beacons National Park Local Development Plan (2018 – 2033) Preferred Strategy Consultation Document https://www.beacons-npa.gov.uk/planning/draft-strategy-and-policy/local-development-plan-review/preferred-strategy/

The focus of development in the Primary Settlements in the North through Options 1, 2 and 4 is anticipated to result in increased pressure on landscape character, setting, and the intrinsic qualities of the National Landscape and National Park. This is given Options 1, 2 and 4 direct a significant level of growth to Abergavenny which is located in close proximity to the National Park and Monmouth and Chepstow which are located in close proximity to the Wye Valley National Landscape.

Option 3 directs growth away from Monmouthshire's nationally designated landscapes, to the South of the County. This will likely reduce the potential for residual adverse effects through protecting these high quality landscapes, and directing growth to areas anticipated to be of higher capacity to accommodate new development, given the urban environment surrounding the M4 corridor. Additionally, directing growth along the M4 corridor will contribute positively towards the preservation of local landscapes throughout the remainder of the County and the rural areas, avoiding development in the open countryside and supporting sustainable patterns of development.

Overall, given Monmouthshire's rural nature and the landscape assets present, it is considered that Options 1, 2 and 4 are more likely to have a negative effect as a result of development in the North. In terms of ranking the Options, Options 1, 2 and 4 are considered worst performing given these Options direct the highest level of growth in close proximity to the National Landscape and National Park. Option 3 is best performing and unlikely to give rise to significant effects given it concentrates growth along the M4 corridor which is an urban area distant from the nationally designated landscapes located to the east and north west of the County. Given that the precise location of growth is not known and further evidence base work is being carried out around landscape sensitivity, all of the options are found to have an uncertain effect at this stage.

Climate change (including flood risk)

Options	Option 1 – Existing LDP Strategy	Option 2 – Proportionate growth	Option 3 – Focus on M4 corridor	Option 4 – Focus in north of County
Rank	2	2	1	2
Significant effect?	Uncertain	Uncertain	Uncertain	Uncertain

Development proposed under any of the Options has the potential to incorporate renewable or low carbon energy, EV charging and smart infrastructure which can support more resilient community infrastructure. There are three substantial main rivers that pass through Monmouthshire, the Rivers Wye, Usk and Monnow and a number of smaller but significant ones are the River Trothy, Olway and Neddern. Monmouthshire is at risk from all types of flooding: surface water, ordinary watercourses, groundwater, rivers and the sea. Both the towns and rural areas are at risk from surface water flooding to various extents during heavy rainfalls. The terrain of the County with its hills,

valleys and plains is also at risk of flooding from watercourses. It is considered that the River Wye has the potential to affect more properties than the others.[53]

In line with the Flood Risk Regulations (2009), the Preliminary Flood Risk Assessment (PRFA) process has been carried out in order to establish the level of flood risk within the area. Subsequent to this, a Flood Risk Management Plan (FRMP) has been produced (2016) which sets out the findings of the PFRA.[54] The FRMP highlights that in terms of fluvial flood risk, communities at most risk from a 1 in 1000 year flood (Flood Zone 2) are Monmouth, Abergavenny and Usk. Communities most at risk of 1 in 1000 year surface flooding (Flood Zone 2) were Caldicot, Abergavenny, and Chepstow. Monmouth, Magor/Undy, Llanfoist Fawr, Usk, and Portskewett all feature as part of the top ten communities at risk from surface water flooding.[55] As such, directing growth to the most sustainable Settlements through Options 1, 2 and 4 have the potential to lead to long term negative effects, given these settlements have been identified as high flood risk areas. It is considered that all new development will accord with Technical Advice Note 15: Development and Flood risk (2004), which sets out a precautionary framework to direct new development away from those areas which are at high risk of flooding.[56] To this effect, in accordance with national policy, information will need to be provided to demonstrate that any development proposal satisfies the tests contained in the TAN.

Option 3 delivers growth to the South of the County, which is not identified through the FRMP as being significantly constrained in terms of fluvial flood risk, with only Magor/ Undy and Portskewett identified as at medium risk of surface water flooding. This Option is therefore likely to perform more positively than other Options, through delivering growth outside of areas at highest risk of flooding.

Overall, it is considered that Options 1, 2 and 4 perform less positively compared to Option 3 given they direct growth to locations vulnerable to flooding. It is however recognised that there is a level of uncertainty for all Options at this stage, and therefore the nature and significance of effects will be dependent on the precise location of growth and mitigation delivered at the project level.

[53] Monmouthshire County Council (2016) Monmouthshire County Council Flood Risk Management Plan https://www.monmouthshire.gov.uk/app/uploads/2016/04/Flood-Risk-Management-Plan.pdf
[54] Ibid.
[55] Ibid.
[56] Welsh Government (2004) Planning Policy and Guidance: Flooding – Technical Advice Note (TAN) 15: Development and Flood Risk https://gov.wales/technical-advice-note-tan-15-development-and-flood-risk

Appendix D – ISA of strategic growth area options

Linked to Chapters 5 and 6, this appendix provides the detailed assessment of the strategic growth area options. Strategic growth areas have been identified in Abergavenny and Llanfoist, Chepstow, Monmouth, and Severnside.

Methodology

For each of the strategic options, the assessment examines likely significant effects on the baseline, drawing on the sustainability objectives and topics identified through scoping (see Table 3.1 in the main report) as a methodological framework.

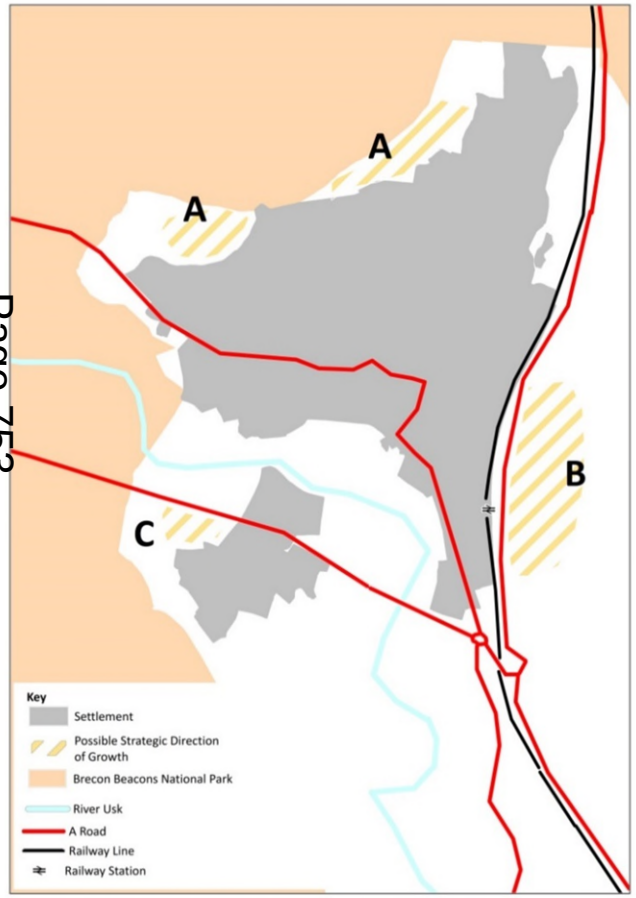
Every effort is made to predict effects accurately; however, this is inherently challenging given the high-level nature of the options under consideration. The ability to predict effects accurately is also limited by understanding of the baseline (now and in the future under a 'no plan' scenario). In light of this, there is a need to make considerable assumptions regarding how scenarios will be implemented 'on the ground' and what the effect on particular receptors would be. Where there is a need to rely on assumptions in order to reach a conclusion on a 'significant effect' this is made explicit in the appraisal text.

It is important to note that effects are predicted considering the criteria presented within Regulations. So, for example, account is taken of the duration, frequency, and reversibility of effects. Cumulative effects are also considered (effects of the plan in combination with the effects of other planned or on-going activity that are outside the control of Monmouthshire County Council).

Based on the evidence available a judgement is made if there is likely to be a significant effect. Where it is not possible to predict likely significant effects on the basis of reasonable assumptions, efforts are made to comment on the relative merits of the alternatives in more general terms and to indicate a rank of preference. The number indicates the rank and does not have any bearing on likely significant effects. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of 'significant effects'. For example, if an option is ranked as 1 then it is judged to perform better against that ISA topic compared to an option that is ranked 2 or 3 and so on.

Abergavenny and Llanfoist options

- Option A: Land north of Abergavenny.
- Option B: Land to the east of the A465; and
- Option C: Land between the B4246 and Heads of the Valleys Road.



Economy and employment

Options	Option A – Land north of Abergavenny	Option B – Land east of the A465	Option C – Land between B4246 and Heads of the Valleys
Rank	**1**	**2**	**3**
Significant effect?	**No**	**No**	**No**

Abergavenny plays a significant economic role in the County, being identified as a Primary Settlement in the RLDP settlement hierarchy. Its location on the Heads of the Valleys road provides strategic links through its links to Brecon, Mid Wales and the wider Cardiff Capital Region; and the A465 separates the town from Llanfoist to the south. Options B and C to the east and west of the A456, respectively, are therefore considered to be less well connected to the town centre.

Abergavenny is one of the most self-sufficient settlements in terms of employment with a variety of employment sites within the town; a number of which are protected employment sites. The largest protected employment sites at Union Street, Hatherleigh Place and Mill Street are located to the south west of the main settlement. These employment sites are reasonably accessible from all growth Options, with all Options required to cross the A40 or A465 for access, and would therefore likely be reliant on the car. However, it is noted that this part of the A40 is more residential with some pedestrian crossings already in place. Overall, all Options perform positively in terms of providing good access to local employment sites, supporting levels of self-containment in Abergavenny.

Option B performs most positively in terms of providing access to Abergavenny railway station which is located adjacent to the Option, to the west. Abergavenny railway station connects residents with employment hubs opportunities of the County including Newport, Cardiff, and the Midlands. Options A and C are both located 1.6 miles, or a 34 minute walk from the station. However, it is noted that Option B is separated from the town and the railway station by the A465 so development would need to provide suitable pedestrian links.

All Options have the potential to include employment land and infrastructure delivery to support the town, encouraging inward investment and supporting local economic growth. It is considered that all Options would be able to deliver a similar level of infrastructure, and therefore Options cannot be differentiated between in this respect. Nonetheless, it is considered that the delivery of infrastructure alongside development has the potential to lead to positive effects against this ISA theme, although this is uncertain at this stage.

Overall, all Options are anticipated to lead to long-term positive effects against this ISA theme. Option A is considered best performing given it is reasonably well connected with the town centre and employment opportunities; and is not detached by the A465; as is the case for Options B and C. Option B performs more positively than Option C given it's distance to Abergavenny railway station, and would support the

uptake of sustainable travel to access employment opportunities outside of the County as long as suitable links to the railway station are delivered.

Population and communities

Options	Option A – Land north of Abergavenny	Option B – Land east of the A465	Option C – Land between B4246 and Heads of the Valleys
Rank	1	2	3
Significant effect?	Yes - Positive	Yes - Positive	Yes - Positive

All Options perform equally in terms of providing sufficient housing to meet the identified housing needs of the community, as it is assumed that all Options could deliver the same quantum of growth. Long term positive effects are predicted in this respect.

There are however significant differences between areas of Abergavenny town, as reflected by the range in the average house prices. While some housing is amongst the most expensive in the County, Lansdown and Priory wards, which include the central area of the town northeast of the main shopping area, are much less desirable locations to live.[57] It is therefore considered that further growth to the north through Option A may lead to positive effects in terms of promoting regeneration in the north of the town, supporting the growth of existing communities and reinforcing Abergavenny's position in the settlement hierarchy as a Tier 1 Primary Settlement. It is however noted that Option A is approximately a mile or a 20-minute walking distance from the town centre where shopping and employment opportunities are focussed. While this is well connected comparatively with other Options it is noted that some residents (notably elderly and those with young children) may rely on the car for access.

Options B and C are further detached from the town centre by the A465 to the east and west of the town, respectively. Option C is the furthest of the options from the town centre, approximately a 2.4 mile or a 57-minute walking distance. Option B is a similar walking distance to Option A however would involve crossing the A465. Options B and C would therefore be more heavily reliant on the car to access the town centre than Option A, performing less positively in terms of potential to support sustainable communities.

While disconnected from the town centre, Option C nonetheless would be an extension of Llanfoist to the west of the town. As such it is considered that development at this location would lead to positive effects through integration with the existing sub-urban community,

[57] Monmouthshire County Council (2018) Final Local Housing Markey Assessment https://www.monmouthshire.gov.uk/app/uploads/2019/05/Final-Local-Housing-Market-Assessment-September-2018.pdf

providing a level of infrastructure to support the smaller settlement. Benefits in this respect may include improved access to facilities, services, and potential improvements to highways/ public transport infrastructure.

Overall, Option A, followed by Option B perform most positively against this ISA theme as they are the most well connected with the town centre, its services and facilities, and sustainable travel. Option A is most likely to support the growth/ regeneration of Abergavenny as an attractive Tier 1 settlement, supporting vibrant communities both within the town and the wider hinterlands.

Health and wellbeing

Options	Option A – Land north of Abergavenny	Option B – Land east of the A465	Option C – Land between B4246 and Heads of the Valleys
Rank	**1**	**2**	**2**
Significant effect?	**No**	**No**	**No**

Monmouthshire has one main hospital, Nevill Hall Hospital in Abergavenny, which has a minor injury unit. Option A is 900m/ a 17-minute walk from the hospital. Option C is 1.2km from the hospital by car, however walking distance is 2.8 miles/ 58 minutes. Option B is the least well located, being over 3km from the hospital. In terms of GP surgeries, there are three located within Abergavenny, close to the town centre. Options A and B are within 1km / 18-minute walking distance of a GP surgery. Option C is considerably further from health facilities in the town centre, approximately 2.4km from Old Station Surgery. However, if travelling by car, Option C is also within 1km.

Access to sustainable transport throughout Abergavenny is good. Notably there are public transport links by rail and bus to Cwmbran, Newport, Cardiff and the Midlands, and good road links to Cwmbran, Newport, Monmouth and the motorway system. Option B is best performing in terms of access to the railway station, which is located adjacent to the site to the west. Options A and B are both located 1.6 miles, or a 34-minute walk from the station. However, it is noted that Option B is separated from the town and the railway station by the A465 so development would need to provide suitable pedestrian links.

All Options have relatively limited access to bus services given the edge of settlement locations. While Option A is located within 400m of a bus stop on Underhill Crescent, this is considerably distant from the northern extent of the site. Option B would require crossing the A465 to access a bus stop unless new bus stops are provided, and Option C has access to a bus stop on the B424; however, this is also distant from the north east of the site which extends into the open rural landscape. It is however recognised that there is a regular bus service from the outskirts of the settlement to the town centre; notably at Underhill Crescent which is accessible from Option A, improving access from the site to the railway station and town centre.

The town's proximity to the Brecon Beacons National Park makes walking, cycling and many other outdoor activities readily accessible, supporting active travel. Option B is best performing in this respect given its proximity to the National Park, and the Brecons Way bridle way located to the north of the growth area. It is also noted that positive effects are also anticipated through Option C, given its location adjacent to the Usk Valley Walk which extends along the Monmouthshire & Brecon Canal.

Overall, Options B and C perform on a par in relation to the Health and wellbeing ISA theme. Option A is best performing in terms of proximity to health services. Option A performs similarly to other options in terms of supporting healthy forms of transport to reach health (and wider) services/ facilities. Option A is less well located in terms of access to the train station; however, it is recognised that the Abergavenny circular bus service provides improved access to some extent.

Equalities, diversity, and social inclusion

Options	Option A – Land north of Abergavenny	Option B – Land east of the A465	Option C – Land between B4246 and Heads of the Valleys
Rank	2	3	1
Significant effect?	No	No	No

Abergavenny is defined as a Tier 1 settlement, and as such, expanding upon built form through all Options will lead to positive effects in terms of supporting and sustaining a hierarchy of vibrant centres across the County, focussing development in accordance with recent population growth data. This will likely positively address existing demographic issues, encouraging younger people to reside and work in the County. It is predicted that growth around Abergavenny will lead to positive effects on new and existing residents' quality of life, supporting regeneration and creating more positively integrated communities. It is however noted that Option B is detached from residential development by the A465, which may reduce potential for positive integration with existing communities.

It is noted that Abergavenny experiences high deprivation in areas. As highlighted above, development at all Options will support equal communities with improved accessibility to services, employment, and affordable housing. However, it is considered that by targeting some of the most deprived communities through Options B and C, positive effects are likely to be enhanced to some degree. Option C seeks to positively expand upon Llanfoist village to the west of Abergavenny. While less deprived itself, Option A performs positively through reducing inequalities between sub-urban and urban areas.

Option A also performs most positively of the Options in terms of ensuring access to services for more vulnerable or immobile groups in the community, particularly elderly residents and young families, especially those without access to private vehicles. Option C is least well

performing in this respect as is the furthest of the options from the town centre (2.4km). Option B is a similar walking distance to Option A; approximately a mile or a 20-minute walking distance.

Overall, it is considered that all Options perform positively against this ISA theme through supporting the growth of and regeneration of existing communities, improving access to housing, jobs and services. However, Option C is predicted to lead to positive effects of greater significance through targeting deprived areas; promoting equality and social inclusion through developing more inclusive communities. Option B performs least well of the Options given it is severed from the settlement by the A465, which may reduce potential for positive integration with existing communities.

Transport and movement

Options	Option A – Land north of Abergavenny	Option B – Land east of the A465	Option C – Land between B4246 and Heads of the Valleys
Rank	=	=	=
Significant effect?	No	No	No

In terms of the strategic transport network, Abergavenny is closely linked to the A465, and plays an important role on the Heads of the Valleys road through its links to Brecon, Mid Wales and the wider Cardiff Capital Region. While levels of self-containment are high in Abergavenny, there remains a reliance on the car as the primary mode of transport, and therefore traffic throughout the town is a significant issue. In addition to high levels of through traffic currently experienced, it is noted that a high percentage of the overall travel to work flows for the County would be to Abergavenny. All Options are well located in terms of access to the strategic transport network (the A465 extends east and west of the main settlement), and it is considered that development under all Options is likely to result in increased vehicular use in the town with the potential for long term adverse effects.

Access to sustainable transport throughout Abergavenny is good. Notably there are public transport links by rail and bus to Cwmbran, Newport, Cardiff and the Midlands. However, of the Options, only Option B is well located in terms of access to the railway station, being located adjacent to the site to the west. Options A and C are both located 1.6 miles, or a 34-minute walk from the station. However, it is noted that Option B is separated from the town and the railway station by the A465 so development would need to provide suitable pedestrian links. All Options have relatively limited access to bus services given the edge of settlement locations. While Option A is located within 400m of a bus stop on Underhill Crescent, this is considerably distant from the northern extent of the site. Option B would require crossing the A465 to access a bus stop, and Option C has access to a bus stop on the B424, however this is also distant from the north east of the site which extends into the open rural landscape. It is however recognised that there is a regular bus service from the outskirts of

the settlement to the town centre; notably at Underhill Crescent which is accessible from Option A, improving access from the site to the railway station and town centre. Option B performs most positively overall given its location in close proximity to the railway station, and subsequently the increased opportunity to encourage modal shift for shorter journeys both within the town, and for wider commuter journeys.

The town's proximity to the Brecon Beacons National Park makes walking, cycling and many other outdoor activities readily accessible, supporting active travel. Option B is best performing in this respect given its proximity to the National Park, and the Brecons Way bridle way located to the north of the growth area. It is also noted that positive effects are also anticipated through Option C, given its location adjacent to the Usk Valley Walk which extends along the Monmouthshire & Brecon Canal.

All Options are assumed to have the potential to include enhancements/ improvements to services/ facilities and public transport. As set out above, the level of infrastructure delivery is expected to be equal under all Options, and therefore none of the Options are better performing in this respect.

Overall, all Options perform similarly against this ISA theme, directing growth towards a Tier 1 settlement, with good access to the strategic transport network. While all Options may increase traffic through the town, it is recognised that Options perform positively in terms of promoting the uptake of sustainable travel. While Option B would arguably provide the greatest opportunity for residents to capitalise upon a range of sustainable transport options; located adjacent to the railway station, and with access to the Brecons Way bridle, it is considered that the separation of the option from the main settlement by the A465 may reduce its potential to encourage a modal shift. Options A and C are better located to the settlement and bus services, but less well located in terms of the railway station. It is therefore concluded that Options cannot be differentiated between at this stage.

Natural resources (air, land, minerals, and water)

Options	Option A – Land north of Abergavenny	Option B – Land east of the A465	Option C – Land between B4246 and Heads of the Valleys
Rank	1	2	3
Significant effect?	Yes - Negative	Yes - Negative	Yes - Negative

While air pollution is not a major problem in Monmouthshire it can cause significant problems for people's health. The greatest problems associated with air quality in the County are caused by vehicle emissions, and therefore Options perform positively where they seek to utilise sustainable transport opportunities; such as active travel networks, improved public transport and electric charging point

infrastructure. This will help to reduce the impact of transport-based emissions and improvements in air quality. Option A is best performing in this respect, being a mile or a 20-minute walking distance from the town centre where shopping and employment opportunities are focussed. However, this is arguably not an achievable walking distance for all residents (notably the elderly and families with young children), with many people still likely to rely on the car for access. Options B and C are further detached from the town centre by the A465 to the east and west of the town, respectively. Option C is the furthest of the Options from the town centre, 2.4 miles away. Option B is a similar walking distance to Option A. Options B and C would therefore be more heavily reliant on the car to access the town centre than Option A, performing less positively in terms of potential to promote sustainable travel. Option B has the potential to encourage modal shift given it is located adjacent to the railway station; however, suitable pedestrian links would need to be delivered for crossing the A465. Options A and C are both located 1.6 miles, or a 34-minute walk from the station. Options B and A are therefore best performing in terms of potential to improve air quality in the town.

The Agricultural Land Classification (ALC) classifies land into six grades (plus 'non-agricultural' and 'urban'), where Grades 1 to 3a are recognised as being the 'best and most versatile' land (BMV) and Grades 3b to 5 are of poorer quality. Detailed agricultural land quality surveys will be undertaken by site promoters as part of the candidate site process, and therefore at this stage ALC at each of the Options has been based on the Predictive ALC model for Wales (2019).[58] The area containing Option C was found to be entirely Grade 2, while the area containing Option B was found to be partially Grade 2 and partially Grade 3a. Option A was the only Option found to include an area of land that is not BMV, containing Grade 2 and 3b. Option A is therefore best performing in this respect, as it would necessitate the least amount of loss of BMV land. All Options comprise entirely greenfield sites and consequently it is not possible to differentiate between them in terms of promoting the use of previously developed land.

None of the Options fall within, or within close proximity to a mineral safeguarding area, and therefore all perform equally in terms of impact on the County's mineral resource. All Options are also considered to perform equally in terms of demand for water, and impact on water quality.

Overall, all Options perform negatively against this ISA theme given all Options would result in the loss of greenfield and BMV agricultural land and would not contribute towards promoting the use of brownfield land. However, it is recognised that there are limited opportunities within the County for brownfield development and development on lower grades of agricultural land. Option A is best performing of the Options as it may encourage active travel to some extent, given its location 1 mile from the town centre; and is the least constrained Option in terms of BMV agricultural land. Option B performs more positively than Option C as it is located adjacent to the railway station, which may encourage modal shift.

[58] The Predictive ALC model for Wales (2019) is based on the principles of the Agricultural Land Classification System of England & Wales, the Revised Guidelines & Criteria for Grading the Quality of Agricultural Land (MAFF 1988).

Biodiversity and geodiversity

Options	Option A – Land north of Abergavenny	Option B – Land east of the A465	Option C – Land between B4246 and Heads of the Valleys
Rank	1	1	2
Significant effect?	Yes - Negative	Yes - Negative	Yes - Negative

In terms of European sites, it is recognised that the HRA (2021) screening of the Preferred Strategy policies found that potential residential or employment sites in Abergavenny are likely to have nutrient neutrality implications for the River Usk SAC, because it is served by WwTWs discharging into the upper reaches of the SAC. Whilst solutions have now been identified (2024) mitigation will be required supported by RLDP policy provisions. All options therefore have the potential to lead to long term significant negative effects in this respect, and options cannot be differentiated given the level of development is considered equal across all options.

In terms of differentiating between the Options, Option A is located 1km south of the Sugar Loaf Woodlands Special Area of Conservation (SAC), and Option C is located approximately 200m south of the River Usk SAC. Taking each European site in turn:

- **The Sugar Loaf Woodlands SAC** comprises 173.1ha of broad-leaved deciduous woodland (76.7%), and heath and scrub (23.3%). The site has been designated for its area of old sessile oak woods near the south-eastern fringe of the habitat's range. This is the largest in the UK and Europe.
- **The River Usk SAC** covers the length of the River Usk, to the west of the County, running through Abergavenny and Usk. The SAC contains habitats listed under Annex I of the Habitats Directive and a variety of species listed under Annex II of the Habitats Directive; that are primary reason for designation. The River Usk SAC is part within the Brecon Beacons National Park Planning Area.

In addition to the water quality issue set out above, the HRA screening (2021) found that there is the potential for development to significantly affect the River Usk through recreation, and water quantity, level and flow. As such, this site and potential impact pathways will be considered in more detail through the Appropriate Assessment stage.

In terms of the Sugar Loaf Woodlands SAC, given the distance (more than 200m) from the nearest major road, adverse impacts are not anticipated on the site through atmospheric pollution. The SAC lies approximately 1km from the Strategic Growth Area of Abergavenny, indicating that it is likely to be within walking distance for new local residents. However, Natural Resources Wales' Core Management Plan

does not refer to recreational pressure as a potential management requirement for the site.[59] It is therefore concluded that there will be no likely significant effects of the Monmouthshire RLDP on the Sugar Loaf Woodlands SAC and the site can be screened out from Appropriate Assessment.

It is therefore considered that Option C performs most negatively in terms of potential impact on the River Usk SAC, given its close proximity. However, given the impact pathways identified, all Options have the potential to lead to adverse effects on the European site. It is however noted that effects may be less significant under Options A and B. Potential strategic growth areas have been identified as needing to be screened in for further detailed consideration through the HRA process.

There is a range of nationally and locally designated biodiversity located around Abergavenny. Some of these designations fall within or have the same boundaries as the European sites considered through the HRA and outline above, although they may have different designated features and sensitivities in some cases. Despite this, the impact pathways identified for European sites are also applicable/ relevant to nationally and locally designated sites and wider biodiversity interests. Notably, as discussed above, Options have the potential to impact on the River Usk SSSI through recreation, water quality and water quantity, level and flow. Option C performs most negatively in this respect given the proximity of the Option to the European designated site.

The Options are also constrained by Ancient Woodland, with a linear area located to the south/ east of Option A, and a significant area coinciding with Ysgyryd Fach hill to the east of Option B. It is considered that Options have the potential to adversely impact on these nationally important habitats (and associated species) through increased disturbance, noise, light and air pollution. This should be considered alongside the potential to possibly enhance these habitats and deliver significant positive effects. For example, development proposals could include the delivery of biodiversity net gain, creating ecological corridors between the woodland habitats and the Options.

The Options are not constrained by locally designated sites; however, it is recognised that all sites are greenfield, and may have the potential to hold biodiversity value. Notably, there are patches of hedges/mature trees extending through Options A and C, and along the field boundaries and along the A465 surrounding /within Option B. There is therefore potential for development across all Options to lead to negative effects on biodiversity through direct loss of these habitats and any associated species. Development should seek to retain and enhance these habitats where possible, ensuring no net loss, and seek to deliver significant positive effects through biodiversity net gain.

Overall, all options have the potential to lead to long term significant negative effects as a result of nutrient neutrality implications for the River Usk SAC and the subsequent mitigation requirements. In terms of ranking the Options, given the presence of the River Usk SAC/ SSSI, Option C is worst performing of the Options, with the greatest potential for negative effects on biodiversity. However, given the impact pathways identified through the HRA for the SAC, it is considered that Options A and B also have the potential to impact upon the European

[59] Countryside Council for Wales (2008) Core Management Plan for Sugar Loaf Woodlands SAC/SSSI https://naturalresources.wales/media/674063/Sugar_Loaf_Woodlands_core_management_plan_Mar_2008%20_A_.pdf

designated site; however, effects are likely to be less significant. Options A and B are also constrained in terms of potential indirect effect on Ancient Woodland; while all Options are constrained in terms of potential adverse effects on habitats present within/ surrounding the Options (i.e., through habitat loss and recreational disturbance). It is however also noted that there is the potential for Options to deliver positive effects through biodiversity enhancement/ net gain.

Historic environment

Options	Option A – Land north of Abergavenny	Option B – Land east of the A465	Option C – Land between B4246 and Heads of the Valleys
Rank	2	1	3
Significant effect?	Uncertain	Uncertain	Uncertain

Option A is located to the north of Abergavenny and would extend the existing built-up area toward the boundary with the Brecon Beacons National Park. Development would be in close proximity to the northern boundary of the Abergavenny Conservation Area and a number of listed buildings. It is assumed development would not extend beyond Pentre Lane or Deri Road into the National Park. It's possible that the site could accommodate development without any significant residual negative effects on the historic environment as long it is sensitively designed, and the layout takes account of any important views into and from the National Park and the Conservation Area. However, this is uncertain at this stage.

Option B is located to the east of the A465 and apart from some listed buildings near the train station, it's not in close proximity to any designated heritage assets. However, as you move further away from the town and the A465 the elevation increases, and development is likely to be become more visible from the settlement and the World Heritage Site (WHS) and National Park across the town. Furthermore, in terms of the wider historic environment this option would extend the built area beyond the A465, a natural barrier to the town for many years, into the countryside. It's possible that the site could accommodate development without any significant residual negative effects on the historic environment as long as it is sensitively designed, and the layout takes account of any important views into and from heritage assets within and beyond the settlement. However, this is uncertain at this stage.

Option C is located to the north west of Llanfoist, between the B4246 and the Heads of the Valleys Road. It would extend the built-up area to the boundary with the Brecon Beacons National Park as well as the Blaenavon Industrial Landscape WHS. Additionally, there are two listed buildings in close proximity to the growth area. It appears that the majority of the growth area sits at a lower elevation than the WHS, National Park and the Heads of the Valley Road. As a result, development is unlikely to significantly affect any views in or out from the WHS or the National Park. Development could affect the setting of a Grade II listed building (Glan nant-y-llan) on Church Lane buts it's

possible that development could avoid the area in the south east adjacent Church Road, which is slightly more elevated and therefore more visible in terms of the WHS and National Park. It's possible that the site could accommodate development without any significant residual negative effects on the historic environment as long as it is sensitively designed and the layout takes account of any important views into and from the National Park, WHS and the listed building off Church Lane. However, this is uncertain at this stage.

It is recognised that Monmouthshire's cultural assets also include the use of the Welsh language. The RLDP is not considered likely to have a significant effect on the Welsh language, and therefore no significant differences have been identified between the Options in this respect.

Given uncertainties no significant differences between the options in terms of the nature and significance of effects could be identified at this stage. They could all potentially affect the setting of designated heritage assets depending on the design and layout of development. Despite this, it is possible to rank them; assuming that the same scale/ type of development would be delivered within the strategic growth areas, the differences identified between them at this stage mainly reflect proximity to designated heritage assets. While there are a significant number of uncertainties at this stage, Option B is considered to be less sensitive in terms of the historic environment compared to the other options. Development at Option A and particular Option C are more likely to affect internationally and nationally designated heritage landscapes and natural landscapes that have shaped development over time and contribute to the character of the area and settlement identities. By its proximity to the WHS as a significant heritage asset, development under Option C is least preferred.

Landscape

Options	Option A – Land north of Abergavenny	Option B – Land east of the A465	Option C – Land between B4246 and Heads of the Valleys
Rank	**3**	**1**	**2**
Significant effect?	**Yes - Negative**	**Yes - Negative**	**Uncertain**

As a largely rural County, Monmouthshire has major landscape resources and is home to internationally and nationally designated landscapes. Looking specifically at Abergavenny, the built-up area to the north and west extends close to the Brecon Beacons National Park (BBNP) boundary and Llanfoist adjoins the Blaenavon World Heritage Site (WHS). In line with Planning Policy Wales (2018) it is recognised that these designated assets are *"valued for their intrinsic contribution to a sense of place, and that their special characteristics should be protected and enhanced."*[60] In addition to national policy requirements, protection is also provided to the Brecon Beacons

[60] Welsh Government (2018) Planning Policy Wales

National Park through the established Local Development Plan in place and development control functions in the correlating part of the County. In terms of the WHS, the Blaenavon WHS Management Plan (2018) identifies an overall vision and key principles for the management of the WHS.[61]

While protection is provided at the higher level, it is nonetheless considered that Options A and C have the potential to adversely impact upon special landscape features, character and setting of the BBNP and WHS. Development to the north through Option A and to the north west of Llanfoist through Option C, would expand the existing built up area toward the boundary with the BBNP; and Option C also has the potential to adversely impact upon the setting of the WHS. It is however possible that Options could accommodate development without any significant residual negative effects on the landscape as long it is sensitively designed, and the layout takes account of any important views into and from the BBNP and WHS. However, this is uncertain at this stage.

It is also noted that Cadw, Natural Resources Wales and the International Council on Monuments and Sites (ICOMOS UK) has compiled a non-statutory Register of 58 Landscapes of Outstanding or Special Historic Interest in Wales. None of the options fall within, or adjacent to these Landscapes of Outstanding or Special Historic Interest.

A Landscape Capacity Update study has been carried out for the County (2020), which identifies Local landscape Character Areas (LLCAs) and provides an overall analysis of each LLCA's sensitivity to residential development.[62] Overall, the study has found that there is capacity for housing in Monmouthshire focussing on the larger settlements; which includes Abergavenny. However, looking specifically at the Options in turn:

- **Option A** is categorised as being of high/medium landscape sensitivity to residential development.
- **Option B** is categorised as having high/medium landscape sensitivity to residential development.
- **Option C** is categorised as having medium landscape sensitivity to residential development.

Given uncertainties no significant differences between the Options in terms of the nature and significance of effects could be identified at this stage. They could all potentially affect the intrinsic qualities, character and setting of designated landscapes/ assets depending on the design and layout of development. Despite this, it is possible to rank them; assuming that the same scale/ type of development would be delivered within the strategic growth areas, the differences identified between them at this stage mainly reflect the Landscape Sensitivity Update Study (2020) findings. Option C is therefore identified as best performing given it is the only Option with 'medium' sensitivity to residential development; however, this Option still has the potential to result in significant negative effects. Option A is worst performing given the potential impact on the BBNP; its open character and hillside setting. It is however noted that for all Options, mitigation (which

[61] Chris Blandford Associates (2018) Blaenavon Industrial Landscape World Heritage Site Management Plan 2018 - 2023
[62] White Consultants (2009) Monmouthshire Landscape Sensitivity and Capacity Study

reduces the extent of development to avoid the most sensitive areas) is considered likely to reduce the significance of the potential negative effects. However, this is uncertain at this stage and will be dependent on the design/ layout and implementation of specific mitigation measures.

Climate change (including flood risk)

Options	Option A – Land north of Abergavenny	Option B – Land east of the A465	Option C – Land between B4246 and Heads of the Valleys
Rank	**2**	**1**	**3**
Significant effect?	**Uncertain**	**Uncertain**	**Uncertain**

Monmouthshire's rurality, limited public transport, high levels of car ownership and the subsequent reliance on the private car, combined with high energy consumption can all contribute to carbon emissions. Monmouthshire County Council declared a climate emergency in May 2019, and as such growth Options will be required to contribute positively towards meeting the Council's aim of reducing its net carbon emissions to zero by 2030.

In relation to climate change adaptation, key issues include the need to capitalise upon opportunities to design-in low carbon infrastructure to development from the outset, and therefore minimise additional CO_2 emissions associated with development. There are no significant differences between the Options in terms of opportunities to design-in low carbon infrastructure, i.e., given there is no difference in quantum of housing growth between options.

All Options also present an opportunity to support adaptation to the potential effects of climate change through providing improvements to the local green infrastructure network. As above, it is considered that all options are able to deliver a similar level of infrastructure, and as such all options perform equally in this respect.

It is considered that there is the potential to reduce greenhouse gas emissions by reducing the need to travel and encouraging the use of sustainable transport modes. Notably, the Active Travel (Wales) Act (2013) requires all local authorities in Wales to deliver improvements to their network of active travel routes and facilities. All Options perform well in this respect, directing growth towards a Tier 1 settlement, with good public transport links connecting residents with employment and services within and outside the County; notably Cwmbran, Newport, Cardiff and the Midlands. Option B arguably provides the greatest opportunity for residents to capitalise upon a range of sustainable transport options given its location adjacent to Abergavenny railway station. However, it is considered that the separation of the Option from the town centre by the A465 may result in heavy reliance on the car for primary mode of travel. Options A and C are better located to the

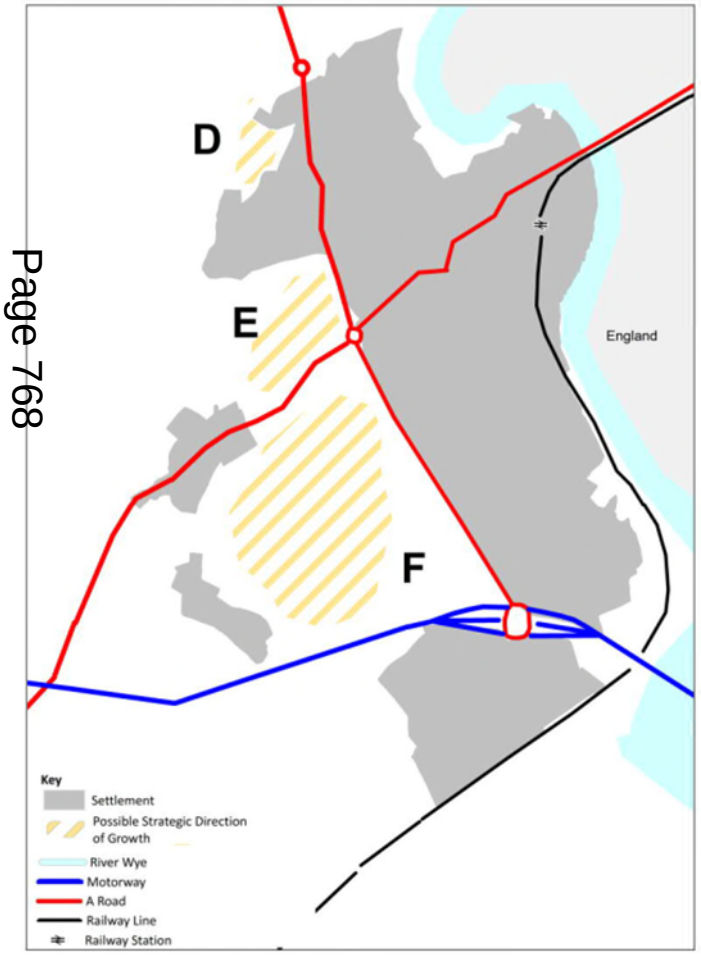
settlement and bus services, but less well located in terms of the railway station. It is therefore concluded that Options cannot be differentiated between at this stage.

In terms of managing flood risk to address climate change, it is recognised that the floodplain of the River Usk is a constraint to the south of the town and in parts of Llanfoist. Looking specifically at the Options, Option B is located within Flood Zone A, and is not at risk of flooding. However, Option C is at high risk of flooding, with a proportion of the Option located within Flood Zones B/ C. Option A includes a very small area within Flood Zones B/ C; extending north to south in the centre of the Option. It is however noted that development under Options B and C could avoid the highest flood risk areas and deliver suitable mitigation (including sustainable drainage systems) to ensure that development does not increase flood risk elsewhere.

Overall, development proposed at the individual Option scale is not likely to have a significant positive or negative effect on climate change when considered in isolation. It is anticipated that this will be addressed through the RLDP policy framework. All Options seek to support the uptake of sustainable travel where possible, however given the presence of the A465 may result in increased reliance on the car for primary mode of travel. As such, effects on climate change in this respect are uncertain. Option C is worst performing of the Options, given that a significant proportion of Option C is located within Flood Zones B/C, with the potential for long term negative effects. However, it is considered that areas at high risk of flooding would be avoided where possible in line with higher tier planning policy and guidance via the PPW and Technical Advice Note 15.

Chepstow options

- Option D: Land north of the Bayfield Estate.
- Option E: Land between the Bayfield Estate and A48; and
- Option F: Land between the A48 and M48.



Economy and employment

Options	Option D – Land north of Bayfield Estate	Option E – Land between Bayfield Estate and A48	Option F – Land between A48 and M48
Rank	**3**	**2**	**1**
Significant effect?	**No**	**No**	**No**

Chepstow plays a significant economic role in the County, being identified as a Primary Settlement in the RLDP settlement hierarchy. Of all of the settlements appraised in the Sustainable Settlement Appraisal (December 2022) it achieved the second highest weighted score, not far behind Abergavenny. Chepstow is well placed on the M4 corridor at the entrance to Wales to capitalise on its strategic road and rail links to the Cardiff Capital Region and South West England and associated economic opportunities. These opportunities have been enhanced given the recent removal of the Severn Bridge Tolls. Option F is arguably best located in this respect, given its location adjacent to the M48, connecting with the M4 and Newport/ Cardiff to the south west.

In terms of facilities and services present, the town centre has a relatively large number and good range of shops and restaurants and is a vibrant focus for the surrounding area. Option E is best performing in terms of access to the town centre, being less than a mile or a 15-minute walking distance. Option D is approximately 1.3km or a 15-minute walk from the town centre, while Option F is furthest away from the town centre at approximately 1.4 miles or a 29-minute walk.

Chepstow is also one of the main focuses of employment within the County. Chepstow has a good range of employment sites within the town, with the largest being the Newhouse Farm Industrial Estate located to the south of the town on the motorway junction with the M48. In terms of access to this employment site, Option F is best performing, being located to the southwest of the settlement, with Option D worst performing being located furthest north. Nonetheless, all Options perform positively in terms of providing good access to local employment sites, supporting levels of self-containment in Chepstow.

It is also noted that a high percentage of residents cross the River Severn daily to work in Bristol. Option F is therefore best performing in terms of access to the Severn Bridge and M48, supporting access to wider employment opportunities outside of the County.

All Options have the potential to include employment land and infrastructure delivery to support the town, encouraging inward investment and supporting local economic growth. It is considered that all options would be able to deliver a similar level of infrastructure, and therefore options cannot be differentiated between in this respect. Nonetheless, it is considered that the delivery of infrastructure alongside development has the potential to lead to positive effects against this ISA theme, although this is uncertain at this stage.

Overall, all options are anticipated to lead to long-term positive effects against this ISA theme. Although least well connected with the town centre, Option F is considered best performing given it is well connected with the M4 corridor, the Severn Bridge, and employment opportunities to the south of the town.

Population and communities

Options	Option D – Land north of Bayfield Estate	Option E – Land between Bayfield Estate and A48	Option F – Land between A48 and M48
Rank	=	=	=
Significant effect?	Yes - Positive	Yes - Positive	Yes - Positive

All options perform equally in terms of providing sufficient housing to meet the identified housing needs of the community, as it is assumed that all options could deliver the same quantum of growth. Long term significant positive effects are predicted in this respect.

There are significant differences between areas of Chepstow as reflected by the range in the average house prices; St Kingsmark ward has the highest prices and St Christopher ward the lowest.[63] It is therefore considered that further growth to the south of Chepstow through Option F may lead to positive effects in terms of promoting regeneration in the south of the town, expanding upon the existing town centre/ retail uses and increasing the potential customer base. This would likely lead to further positive effects in terms of promoting the growth/ regeneration of existing communities and reinforcing Chepstow's position in the settlement hierarchy. However, it is noted that Option F is detached to some extent from the main built up area by the A466, and may not integrate well with the existing community. Option F may also negatively impact upon the identity of smaller, distinct communities in the open countryside to the west of the main settlement, notably between Chepstow and Pwllmeyric and Mathern. Option E may also perform negatively in this respect, between Chepstow and Pwllmeyric. Conversely, however, directing growth to smaller, suburban settlements would likely promote sustainable communities; improving access to the motorway and railway station for employment, wider services and facilities. Options D and E would extend the built up area of Bayfield to the north and south, respectively. Development at this location would likely more positively integrate with the existing community, providing a level of infrastructure to support the settlement and improve connections with the main town centre to the east.

[63] Monmouthshire County Council (2018) Final Local Housing Markey Assessment https://www.monmouthshire.gov.uk/app/uploads/2019/05/Final-Local-Housing-Market-Assessment-September-2018.pdf

Overall, it is not considered possible to differentiate between the options at this stage. All options perform positively in terms of supporting the growth/ regeneration of Chepstow as an attractive Tier 1 settlement, supporting vibrant communities both within the town and the wider hinterlands.

Health and wellbeing

Options	Option D – Land north of Bayfield Estate	Option E – Land between Bayfield Estate and A48	Option F – Land between A48 and M48
Rank	**=**	**=**	**=**
Significant effect?	**No**	**No**	**No**

Chepstow does not include a hospital; however it is supported by Chepstow Community Hospital which includes two GP practices; Mount Pleasant and Town Gate surgeries. Chepstow Community Hospital is located to the west of the settlement, adjacent to the A466. In terms of access to the Community Hospital and associated GP surgeries, Option E is best performing, followed closely by Option D, with Option F least well performing. However, all Options are within 1 mile of the Community Hospital and therefore considered to have good access to health services. For wider hospital services (i.e. A&E and Minor Injuries Unit), The Grange University Hospital in Cwmbran, which is the main hospital in the area, is approximately 34.4km from Chepstow, and there is also the Royal Gwent Hospital located in Newport; 18 miles from Chepstow, respectively. Option F is best located in terms of access to wider hospital services to the east and west, given the close proximity to the M48, to the south of the Chepstow.

Being located close to the M48, Option F also has the potential to perform negatively against this ISA theme as a result of potential impacts on residents' health (i.e. through atmospheric and noise pollution). The Department of Transport's Transport Analysis Guidance outlines that, within 200m, the contribution of vehicle emissions from the roadside to local pollution levels is significant. However, it is noted that the nature and significance of effects are uncertain and dependent on the precise scale, layout and design of growth.

While it is recognised that the car is the primary mode of travel throughout Chepstow (utilising the M4 corridor as set out above), Chepstow benefits from active travel routes, an existing railway station and frequent bus services. Notably there are public transport links by bus to Cwmbran, Chepstow circular, Pontypool and Monmouth. All Options have access to a bus stop on the A466, however this is distant from the western extent of all Options, which are relatively distant from the settlement in the open rural landscape. All Options are also a similar distance from Chepstow railway station (1 mile/ 18-minute walk), located on the other side of the settlement, to the east. Chepstow railway station connects residents with the wider south west Wales region and the midlands; including Newport, Cardiff, Birmingham, and Nottingham.

Overall, all Options perform positively in relation to the health and wellbeing ISA theme. It is difficult to distinguish between the Options at this stage, with all options providing residents with good access to health services and supporting active travel.

Equalities, diversity, and social inclusion

Options	Option D – Land north of Bayfield Estate	Option E – Land between Bayfield Estate and A48	Option F – Land between A48 and M48
Rank	2	1	3
Significant effect?	No	No	No

Chepstow is defined as a Tier 1 settlement, and as such, expanding upon built form through all Options will lead to positive effects in terms of supporting and sustaining a hierarchy of vibrant centres across the County, focussing development in accordance with recent population growth data. This will likely positively address existing demographic issues, encouraging younger people to reside and work in the County. Chepstow experiences slightly higher levels of deprivation, as highlighted above, development at all Options will support equal, sustainable communities, notably with improved accessibility to services to address deprivation; but also through access to employment and affordable housing.

In addition to addressing higher levels of deprivation, directing growth around Chepstow will lead to positive effects in terms of improving access to services for vulnerable or immobile groups in the community (particularly elderly residents and young families). Option E is likely to deliver positive effects of greatest significance in this respect given Option E is most well connected with Chepstow town centre. This is followed by Option D, and subsequently Option F, which is approximately 1.4 miles or a 29 minute walk from the town centre. All Options also perform well through reducing inequalities between sub-urban and urban areas, expanding upon Bayfield, Pwllmeyric, Mounton and Newton Green to the west of Chepstow.

Overall, it is considered that all Options perform positively against this ISA theme. Options will support the growth of and regeneration of existing communities, improving access to housing, jobs and services. All Options will also support integration between urban and sub-urban communities, reducing inequality. In terms of ranking the Options, Option E performs most positively given it is most well connected to the town centre, providing access for vulnerable groups and supporting improved levels of deprivation. Option F performs least positively overall given its distance from services in the town centre, which may exacerbate deprivation levels in this respect.

Transport and movement

Options	Option D – Land north of Bayfield Estate	Option E – Land between Bayfield Estate and A48	Option F – Land between A48 and M48
Rank	**=**	**=**	**=**
Significant effect?	**No**	**No**	**No**

In terms of the strategic transport network, Chepstow is well placed on the M4 corridor at the entrance to Wales to capitalise on its strategic road and rail links to the Cardiff Capital Region and South West England. It is also recognised that the recent removal of the Severn Bridge Tolls has enhanced accessibility in this respect. Given its location adjacent to the M48, Option F is arguably the most well located of the Options, connecting with the M4 and Newport/ Cardiff to the south west.

While levels of self-containment are high in Chepstow, there are consequently substantial daily flows of commuters to and from the town, with levels of car reliance high. The A48, which provides the main link between the southern part of the Forest of Dean and the motorway network, passes through the town and creates congestion problems; with part of the route also designated as an Air Quality Management Area (AQMA). All Options are well located in terms of access to the strategic road network, with Option F notably located adjacent to the M48, connecting with the M4 and Newport/ Cardiff to the south west. As such, it is considered that development under all options is likely to result in increased vehicular use in the town with the potential for long term adverse effects.

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While it is recognised that the car is the primary mode of travel throughout Chepstow (utilising the M4 corridor as set out above), Chepstow benefits from active travel routes, an existing railway station and frequent bus services. Notably there are public transport links by bus to Cwmbran, Chepstow circular, Pontypool and Monmouth. All Options have access to a bus stop on the A466; however, this is distant from the western extent of all Options, which are relatively distant from the settlement in the open rural landscape. All Options are also a similar distance from Chepstow railway station (1 mile/ 18-minute walk), located on the other side of the settlement, to the east. Chepstow railway station connects residents with the wider south west Wales region and the midlands; including Newport, Cardiff, Birmingham, and Nottingham.

All Options are assumed to have the potential to include enhancements/ improvements to services/ facilities and public transport. As set out above, the level of infrastructure delivery is expected to be equal under all Options, and therefore none of the options are better performing in this respect.

Overall, all Options perform similarly against this ISA theme, directing growth towards a Tier 1 settlement, with good access to the strategic transport network. While all options may increase traffic through the town, leading to adverse effects on air quality and the Chepstow AQMA, it is recognised that Options perform positively in terms of promoting the uptake of sustainable travel.

Natural resources (air, land, minerals, and water)

Options	Option D – Land north of Bayfield Estate	Option E – Land between Bayfield Estate and A48	Option F – Land between A48 and M48
Rank	=	=	=
Significant effect?	**Yes - Negative**	**Yes - Negative**	**Yes - Negative**

While air pollution is not a major problem in Monmouthshire it can cause significant problems for people's health. The greatest problems associated with air quality in the County are caused by vehicle emissions, this is particularly apparent through the Air Quality Management Area (AQMA) present at Chepstow (and another at Usk). Chepstow AQMA is located in the centre of the town, encompassing properties either side of the A48, between the roundabout with the A466 to the west and extending east just beyond the junction with the B4293 at Hardwick Terrace. Chepstow AQMA was designated in 2007 for levels of NO_2; predominately caused by vehicle emissions from through traffic in the town centre. Options E and F are located adjacent to the AQMA, to the west of the A48 and the A48/ A458 roundabout. It is therefore considered that new development at these Options would lead to increased vehicular use within the AQMA, resulting in heightened levels of NO_2, and an overall adverse effect on air quality. While Option D is located further from the AQMA, to the north west of the town, residents will have to travel in to the AQMA to access services and facilities within Chepstow town centre, contributing to air quality issues. Negative effects are therefore predicted for all Options.

The Agricultural Land Classification (ALC) classifies land into six grades (plus 'non-agricultural' and 'urban'), where Grades 1 to 3a are recognised as being the 'best and most versatile' land (BMV) and Grades 3b to 5 are of poorer quality. Detailed agricultural land quality surveys will be undertaken by site promoters as part of the candidate site process, and therefore at this stage ALC grades at each of the Options has been based on predictive mapping. The area containing Options D and E were found to be entirely Grade 2, while the area containing Option F was found to be predominately Grade 1 with smaller areas of Grade 2 and Grade 3a. All Options therefore perform equally, given all are wholly located within BMV agricultural land, leading to the permanent loss of this resource. All Options also comprise entirely greenfield sites and consequently it is not possible to differentiate between them in terms of promoting the use of previously developed land.

All Options are considered to perform equally in terms of demand for water, and impact on water quality. All of the Options fall within the limestone minerals safeguarding area, and therefore also perform equally in terms of impact on the County's mineral resource.

Overall, all Options are considered to perform equally against this ISA theme. Options are anticipated to have long term negative effects through increased vehicular use within Chepstow AQMA, and the permeant loss of BMV agricultural land /greenfield land. However, it is recognised that there are limited opportunities within the County for brownfield development and development on lower grades of agricultural land.

Biodiversity and geodiversity

Options	Option D – Land north of Bayfield Estate	Option E – Land between Bayfield Estate and A48	Option F – Land between A48 and M48
Rank	1	2	3
Significant effect?	Uncertain	Uncertain	Uncertain

In terms of European sites, the Wye Valley Woodland SAC is located 600m east of Option D, 900m east of Option E, and 1.2km north east of Option F. The River Wye SAC is located 800m east of Option D, 1km east of Option F, and 1.5km east of Option E. Taking each SAC in turn:

- **The Wye Valley Woodland SAC** is a large woodland SAC that straddles the Wales-England border, extending along the east of the County. The site is underpinned by nine SSSIs in Wales and seven in England. The Wye Valley contains abundant and near continuous semi-natural woodland along the gorge. The variety of woodland types found are rare within the UK.
- **The River Wye SAC** covers the length of the River Wye, to the north east of the County, notably extending through Monmouth. The SAC contains habitats listed under Annex I of the Habitats Directive and a variety of species listed under Annex II of the Habitats Directive which are also the primary reasons for designation. The River Wye is important for its population of Atlantic salmon, and whilst stocks have declined the salmon population is still of considerable importance in UK terms. The Wye also holds the densest and most well established otter population in Wales. The site is considered one of the best in the UK for white-clawed crayfish. Other important species supported by the River Wye are twaite shad, bullhead and river, sea and brook lamprey.

HRA Screening (2019) of the Preferred Strategy policies found that there is the potential for development to significantly affect the Wye Valley Woodland SAC through atmospheric pollution; and for development to affect the River Wye SAC through atmospheric pollution, recreation, water quality and water quantity, level and flow. As such, the European sites, and their potential impact pathways, will be

considered in more detail through the Appropriate Assessment stage. It is therefore considered that all Options have the potential to indirectly impact upon the SACs. Potential strategic growth areas have been identified as needing to be screened in for further detailed consideration through the HRA process.

There is a range of nationally and locally designated biodiversity located around Chepstow. Some of these designations fall within or have the same boundaries as the European sites considered through the HRA and outlined above, although they may have different designated features and sensitivities in some cases. Despite this, the impact pathways identified for European sites are also applicable/ relevant to nationally and locally designated sites and wider biodiversity interests. Notably, as discussed above, Options have the potential to impact on the River Wye SSSI through atmospheric pollution, recreation, water quality and water quantity, level and flow; and to impact on the Wye Valley Woodlands SSSI/ National Nature Reserve through atmospheric pollution.

All Options are also constrained by Ancient Woodland:

- Bishops Barnet Wood and Great Barnet Wood is 100m northeast of Option D;
- A small area of Ancient Woodland is located north of Option E, south of Mounton Road; and
- There are two distinct areas of Ancient Woodland located within Option F, including East Wood.

There is the potential for development at Option F to have a significant negative effect on biodiversity through direct loss of this important habitat and associated species, in addition to potential for indirect negative effects as a result of increased disturbance, noise, light and air pollution. Effects are likely to be indirect through Options D and E given the proximity to the habitats. Consideration should be given under all Options for the potential to deliver positive effects through retaining and enhancing habitats where possible; delivering biodiversity net-gain. This may include creating ecological corridors and connecting biodiversity sites, notably through Option F.

Options are not constrained by locally designated sites; however, it is recognised that all sites are greenfield, and may have the potential to hold biodiversity value. Notably, there are patches of hedges/ mature trees to the north and south west of Option E, and there are sparse hedges and areas of dense vegetation dispersed through Option F; in addition to the Ancient Woodland discussed above. There is the potential for development across Option F, and to a lesser extent Option E, to lead to negative effects on biodiversity through direct loss of these habitats and any associated species. Development should seek to retain and enhance these habitats where possible, ensuring no net loss, and seek to deliver significant positive effects through biodiversity net gain.

Overall, all Options have the potential to lead to adverse effects on biodiversity, given the presence of the Wye Valley Woodland SAC/ SSSI/ National Nature Reserve and River Wye SAC/ SSSI to the east of the settlement. It is difficult to differentiate the Options in terms of impacts on the European designated sites given the impact pathways identified; although it is noted that Option D is considerably closer to the Wye

Valley Woodlands than Option F and is considerably closer to the River Wye than Option E; with the potential for increased significance of effects. In terms of wider biodiversity effects, it is considered that Option F is worst performing given the areas of Ancient Woodland (and other habitats and associated species) present within the Option. Options D and E are less constrained in terms of habitats present at the Options, however, are located in close proximity to Ancient Woodland, with the potential for residual indirect negative effects. It is however also noted that there is the potential for Options to deliver positive effects through biodiversity enhancement/ net gain.

Historic environment

Options	Option D – Land north of Bayfield Estate	Option E – Land between Bayfield Estate and A48	Option F – Land between A48 and M48
Rank	1	1	2
Significant effect?	Uncertain	Uncertain	Yes - Negative

Option D does not contain any designated heritage assets within the growth area. Bishop Barnet's Wood Camp Scheduled Monument is situated approximately 300m to the west from the edge of the growth area. There is also a Grade II listed building (Lion Gates and attached Lodges at Chepstow Racecourse) situated to the north east across the A466. Key considerations in terms of the historic environment for growth in this area will be impacts on the scheduled monument, which comprises the remains of an earthwork enclosure and it forms an important element within the wider later prehistoric context and within the surrounding landscape. It's possible that the site could accommodate development without any significant residual negative effects on the scheduled monument and wider historic environment as long it is sensitively designed; however, this is uncertain at this stage.

Option E does not contain any designated heritage assets but there are three listed buildings in close proximity, one to the north close to Mounton Road and two to the south on the other side of the A48. The growth area is adjacent to the Mathern Conservation Area and is approximately 600m from the Mounton Conservation Area and a cluster of listed buildings that lie within it to the west. It's possible that the site could accommodate development without any significant residual negative effects on the Conservation Areas if development does not extend beyond St Lawrence Lane and it is sensitively designed with appropriate screening, and the layout takes account of views into and from the conservation areas. Another consideration in terms of the historic environment for growth in this area will be impacts on the St Lawrence House Grade II Listed Building in the north and it is likely that its setting would be affected by development in this area.

Option F contains 16 listed buildings and is located entirely within the Mathern Conservation Area. Development within this growth area would result in the loss of large areas of greenfield/ open space within the Mathern Conservation Area and around the listed buildings

present. There is the potential for a permanent significant negative effect on the historic environment as a result of strategic development in this area; however, there is some uncertainty at this stage.

Cadw, Natural Resources Wales and the International Council on Monuments and Sites (ICOMOS UK) has compiled a non-statutory Register of 58 Landscapes of Outstanding or Special Historic Interest in Wales. None of the Options fall within, or adjacent to these Landscapes of Outstanding or Special Historic Interest.

It is recognised that Monmouthshire's cultural assets also include the use of the Welsh language. The RLDP is not considered likely to have a significant effect on the Welsh language, and therefore no significant differences have been identified between the Options in this respect.

Overall, Option F is the most sensitive in terms of the historic environment as the growth area falls within a conservation area and contains 16 listed buildings. It is not possible to identify any significant differences between Options D and E at this stage; however, they are considered to be less likely to result in residual significant effects compared to Option F.

Landscape

Options	Option D – Land north of Bayfield Estate	Option E – Land between Bayfield Estate and A48	Option F – Land between A48 and M48
Rank	**2**	**1**	**3**
Significant effect?	**Yes - Negative**	**Yes - Negative**	**Yes - Negative**

As a largely rural County Monmouthshire has major landscape resources and is home to internationally and nationally designated landscapes. Looking specifically at Chepstow, the area immediately north of the town lies within the Wye Valley National Landscape (formerly Area of Outstanding National Beauty (AONB)). Planning Policy Wales (2018) gives National Parks and AONBs equal status in terms of landscape and scenic beauty, recognising that these designated assets should be *"valued for their intrinsic contribution to a sense of place, and that their special characteristics should be protected and enhanced."*[64] In addition to national policy requirements, protection is also provided to the Wye Valley through the Wye Valley AONB Management Plan (2021). While protection is provided at the higher level, it is nonetheless considered that Options D and E have the potential to adversely impact upon the National Landscape (AONB), its special landscape features, character and setting.

[64] Welsh Government (2018) Planning Policy Wales

Cadw, Natural Resources Wales and the International Council on Monuments and Sites (ICOMOS UK) has compiled a non-statutory Register of 58 Landscapes of Outstanding or Special Historic Interest in Wales. None of the Options fall within, or adjacent to these Landscapes of Outstanding or Special Historic Interest.

It is also noted that land to the west of the A466 is currently protected by a 'Green Wedge' policy to ensure the town's physical separation from Pwllmeyric and Mathern. Part of Option E (the area between Mounton Road and the A48) and part of Option F (the area between the A48 and the M48) falls within the Green Wedge. It is considered that development at this location could lead to coalescence between Chepstow and Pwllmeyric (under Option E) and Chepstow and Pwllmeyric and Mathern (under Option F).

A Landscape Capacity Update study has been carried out for the County (2020), which identifies Local landscape Character Areas (LLCAs) and provides an overall analysis of each LLCA's sensitivity to residential development.[65] Overall, the study has found that there is capacity for housing in Monmouthshire focussing on the larger settlements; which includes Chepstow. However, looking specifically at the Options in turn:

- **Option D** is s categorised as being of medium landscape sensitivity to residential development.
- **Option E** is a mixture of medium and high/medium landscape sensitivity to residential development.
- **Option F** is categorised as high landscape sensitivity to residential development

Overall, all Options are particularly sensitive in terms of the landscape, with the potential for significant long term negative effects. Depending on the design and layout of development, Options D and E could potentially affect the intrinsic qualities, character and setting of the National Landscape (AONB), while Option F could impact upon the sensitivity of the settlement itself; being located on sloping parkland/ and partial designation as a 'Green Wedge'. In terms of ranking the Options, assuming that the same scale/ type of development would be delivered within the strategic growth areas, the differences identified between them at this stage mainly reflect the Landscape Sensitivity Update Study (2020) and findings. Option F is worst performing, given its 'high' sensitivity to residential development; followed by Option D given it is identified as having medium landscape sensitivity and located adjacent to the National Landscape (AONB). For all Options, mitigation (which reduces the extent of development to avoid the most sensitive areas) is considered likely to reduce the significance of the potential negative effects. However, this is uncertain at this stage and will be dependent on the design/ layout and implementation of specific mitigation measures.

[65] White Consultants (2009) Monmouthshire Landscape Sensitivity and Capacity Study

Climate change (including flood risk)

Options	Option D – Land north of Bayfield Estate	Option E – Land between Bayfield Estate and A48	Option F – Land between A48 and M48
Rank	**=**	**=**	**=**
Significant effect?	**No**	**No**	**No**

Monmouthshire's rurality, limited public transport, high levels of car ownership and the subsequent reliance on the private car, combined with high energy consumption can all contribute to carbon emissions. Monmouthshire County Council declared a climate emergency in May 2019, and as such growth Options will be required to contribute positively towards meeting the Council's aim of reducing its net carbon emissions to zero by 2030.

In relation to climate change adaptation, key issues include the need to capitalise upon opportunities to design-in low carbon infrastructure to development from the outset, and therefore minimise additional CO_2 emissions associated with development. There are no significant differences between the Options in terms of opportunities to design-in low carbon infrastructure, i.e. given there is no difference in quantum of housing growth between Options.

All Options also present an opportunity to support adaptation to the potential effects of climate change through providing improvements to the local green infrastructure network. As above, it is considered that all options are able to deliver a similar level of infrastructure, and as such all Options perform equally in this respect.

It is considered that there is the potential to reduce greenhouse gas emissions by reducing the need to travel, and encouraging the use of sustainable transport modes. Notably, the Active Travel (Wales) Act (2013) requires all local authorities in Wales to deliver improvements to their network of active travel routes and facilities. All Options perform well in this respect, directing growth towards a Tier 1 settlement with good public transport links connecting residents with employment and services within and outside the County; notably bus services run to Cwmbran, Chepstow circular, Pontypool and Monmouth. All Options have access to a bus stop on the A466; however, this is distant from the western extent of all options, which are relatively distant from the settlement in the open rural landscape. All Options are also a similar distance from Chepstow railway station (1 mile/ 18 minute walk), located on the other side of the settlement, to the east. Chepstow railway station connects residents with the wider south west Wales region and the midlands; including Newport, Cardiff, Birmingham, and Nottingham. However, the A48, which provides the main link between the southern part of the Forest of Dean and the motorway network, passes through the town and creates congestion problems; with part of the route also designated as an Air Quality Management Area (AQMA). All Options are well located in terms of access to the strategic road network, with Option F notably located adjacent to the M48,

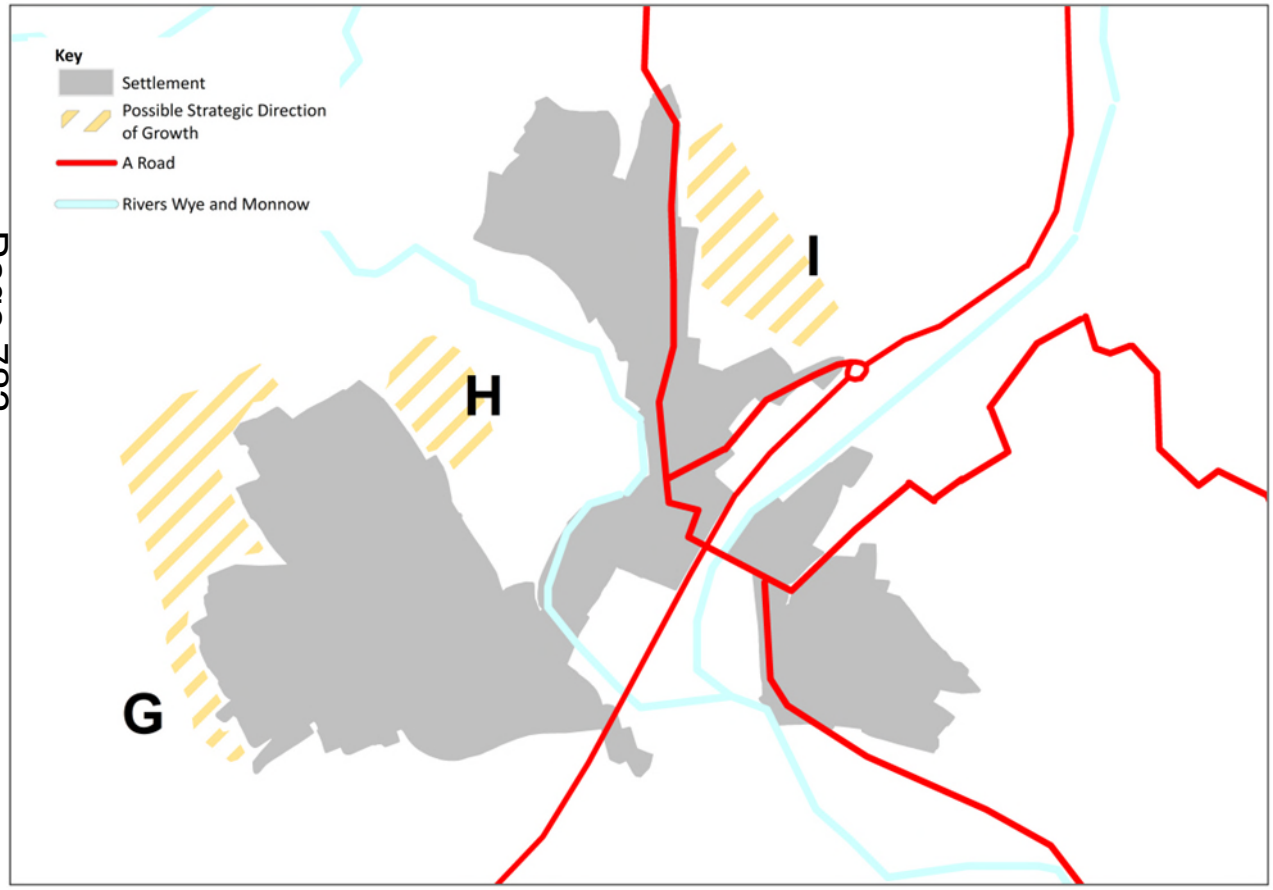
connecting with the M4 and Newport/ Cardiff to the south west. As such, it is considered that development under all Options has the potential to result in increased vehicular use in and around Chepstow.

In terms of managing flood risk to address climate change, while it is recognised that the east of the town is constrained by the River Wye, all Options are located to the west of the Chepstow and therefore are at low risk of flooding.

Overall, development proposed at the individual Option scale is not likely to have a significant positive or negative effect on climate change when considered in isolation. It is anticipated that this will be addressed through the RLDP policy framework. All Options perform on a par in terms of potential flood risk, and seek to support the uptake of sustainable travel where possible. However, the presence of the A48 (and connectivity with the M48 and M4 corridor), may result in increased reliance on the car for primary mode of travel, exacerbating air quality issues in the centre of the town and within Chepstow AQMA. As such, residual effects on climate change are uncertain.

Monmouth options

- Option G: Land west of Monmouth.
- Option H: Land in central Monmouth; and
- Option I: Land north-east of Monmouth.



Economy and employment

Options	Option G – Land west of Monmouth	Option H – Land in central Monmouth	Option I – Land north east of Monmouth
Rank	**2**	**1**	**3**
Significant effect?	**No**	**No**	**No**

Monmouth plays a significant economic role in the County, being identified as a Primary Settlement in the RLDP settlement hierarchy. It has excellent road links occupying a key strategic location on the road network between Newport (A449), Abergavenny (A40) and the Midlands (A466) and has a range of bus services to the South Wales cities and to Gloucestershire and Herefordshire. Option I notably has good access to the A40 and A466.

In terms of facilities and services present, Monmouth scores well within the settlement appraisal, given its relatively large number and good range of shops and restaurants, and is a vibrant focus for the surrounding area. Option H performs most positively in this respect, being centrally located and approximately 0.5 miles / 11-minute walk from town centre. Option I is also considered to have good access to the town centre, its amenities and facilities, being approximately 0.7 miles or a 13-minute walking distance. Option G is furthest from the town centre and therefore worst performing of the Options, at approximately 1.4 miles and a 28-minute walk. Option G would likely rely on the car for day-to-day access to services and facilities in the centre, via the A40/ A466.

Monmouth is one of the most self-sufficient settlements in terms of employment with a variety of employment sites within the town. Monmouth's largest employment area is an Industrial Estate to the South West of the settlement. There has also been recent strategic growth to the south west of the town with a mixed-use development to the west of the Wonastow Estate allocated under the current LDP, which is near completion. In terms of access to employment to the southwest of the town, Option G is best performing, being located adjacent to employment focussed along Wonastow Road. There is also opportunity for Option G to extend upon the existing Wonastow industrial estate. Option H is located 1.1 mile/ 23-minute walk from Wonastow Road, while Option I is least well performing of the Options in this respect, being located 1.8 miles/ 36-minute walk from employment opportunities to the south of the town. Residents at Option I would therefore likely be reliant on the car for access. Nonetheless, all Options perform positively in terms of providing access to local employment sites, supporting levels of self-containment in Monmouth.

All Options have the potential to include employment land and infrastructure delivery to support the town, encouraging inward investment and supporting local economic growth. It is considered that all options would be able to deliver a similar level of infrastructure, and therefore

options cannot be differentiated between in this respect. Nonetheless, it is considered that the delivery of infrastructure alongside development has the potential to lead to positive effects against this ISA theme, although this is uncertain at this stage.

Overall, all options are anticipated to lead to long-term positive effects against this ISA theme. Option H is best performing as it is most centrally located in terms of access to the town centre, its services and facilities, and is within reasonable distance of employment opportunities to the south of the town. Option G also performs well given its location adjacent to the Wonastow Estate employment site; however, it is most distant from the town centre. Option I is reasonably well located in terms of the town centre but performs poorly in terms of access to Wonastow Estate.

Population and communities

Options	Option G – Land west of Monmouth	Option H – Land in central Monmouth	Option I – Land north east of Monmouth
Rank	2	1	1
Significant effect?	Yes - Positive	Yes - Positive	Yes - Positive

All options perform equally in terms of providing sufficient housing to meet the identified housing needs of the community, as it is assumed that all Options could deliver the same quantum of growth. Long term significant positive effects are predicted in this respect.

There are significant differences between areas of Monmouth as reflected by the range in the average house prices; Dixton with Osbaston ward has the highest house prices and Wyesham ward the lowest.[66] All Options direct growth to the north of the A40, away from Wyesham which is located to the south of the town. Option I is located in close proximity to Dixton, to the north east of the Option.

All Options have the potential to support the growth of existing communities; however, this is likely to be more achievable through Options H and I, given their location in terms of access to the town centre (0.5 miles/ 11-minute walk from Option H, and 0.7 miles/ 13 minute walk from Option I). Notably Option H would extend existing built form at Over Monnow, while Option I would extend the suburb of Obaston to the north east of Monmouth, supporting regeneration at these locations. Option G is arguably more isolated in this respect, being less well connected to the town centre (1.4 miles and a 28-minut walk). Nonetheless, all Options would likely integrate positively with existing communities present, providing a level of infrastructure to support the sub-areas and improve connections with Monmouth town centre.

[66] Monmouthshire County Council (2018) Final Local Housing Market Assessment https://www.monmouthshire.gov.uk/app/uploads/2019/05/Final-Local-Housing-Market-Assessment-September-2018.pdf

Benefits in this respect may include improved access to facilities, services, and potential improvements to highways/ public transport infrastructure.

Overall, it is considered that all Options perform positively in terms of supporting the growth/ regeneration of Monmouth as an attractive Tier 1 settlement, supporting vibrant communities both within the town and the wider hinterlands. In terms of ranking Option G performs least well given its distance from the town centre, services and facilities. It is not possible to differentiate between Options H and I at this stage, as both connect well with the town centre and existing communities on the outskirts of the settlement.

Health and wellbeing

Options	Option G – Land west of Monmouth	Option H – Land in central Monmouth	Option I – Land north east of Monmouth
Rank	1	1	1
Significant effect?	No	No	No

Monmouth does not include a hospital, however it is supported by Monnow Vale Community Hospital (Monnow Vale Integrated Health and Social Care Facility). This specialist hospital provides a range of Health & Social Care needs to people over the age of 65, and also includes access to many specialist Clinics. Option H is best located in terms of access to the Community Hospital, followed by Option G, with Option I least well performing, located 1.3 miles/ 28-minute walking distance away. All Options therefore have good access to the Community Hospital. In terms of GP surgeries, there are two located within Monmouth; Dixton Surgery and Castle Gate Medical Centre. Option I is 800m/ 18-minute walk from Dixton Surgery, while Options G and H are a 900m/ 18 minute walk, and a 0.7 mile/ 14 minute walk from Castle Gate Medical Practice, respectively. All Options therefore perform positively in terms of access to local health facilities. Given the specialist nature of Monnow Vale Community Hospital, it is considered that residents would travel to Nevill Hall Hospital in Abergavenny for wider hospital services. All Options are approximately 18 miles from Nevill Hall Hospital.

Access to sustainable transport throughout Monmouth is reasonable; Monmouth has excellent road links occupying a key strategic location on the road network between Newport (A449), Abergavenny (A40) and the Midlands (A466), which is likely to be utilised by residents. Option I notably has good access to the A40 and A466. There is no railway station located within Monmouth; the nearest being Abergavenny railway station, approximately 16 miles west of all Options. Monmouth does however have a range of bus services which connect residents with the South Wales cities and to Gloucestershire and Herefordshire. All Options are within 400m of a bus stop; in terms of Option G, the nearest bus stop is along Wonastow Road, 400m from the northern extent of the site. In terms of Option H, there is a bus stop adjacent to the site along Rockfield Road, and similarly for Option I, there is a bus stop adjacent to the site along Dixton Road.

The town is in close proximity to Kings Wood to the west, and it is noted that Option G is adjacent to the Offa's Dyke Path along Watery Lane, which connects the Option to the Wood. Option G therefore performs positively in terms of access to walking and cycling, in addition to recreational activities at Kings Wood.

Overall, all Options perform positively in relation to the health and wellbeing ISA theme. It is difficult to differentiate between the Options at this stage, with all options providing residents with good access to health services and supporting accessibility by healthy forms of transport.

Equalities, diversity, and social inclusion

Options	Option G – Land west of Monmouth	Option H – Land in central Monmouth	Option I – Land north east of Monmouth
Rank	=	=	=
Significant effect?	No	No	No

Monmouth is defined as a Tier 1 settlement, and as such, expanding upon built form through all Options will lead to positive effects in terms of supporting and sustaining a hierarchy of vibrant centres across the County, focussing development in accordance with recent population growth data. This will likely positively address existing demographic issues, encouraging younger people to reside and work in the County. It is predicted that growth around Monmouth will lead to positive effects on new and existing residents' quality of life, creating more positively integrated communities.

None of the options fall within areas of significantly high deprivation. As highlighted above, development at all Options will support equal communities with improved accessibility to services, employment, and affordable housing. However, it is considered that by targeting more deprived communities through Options G and H (albeit not significantly more deprived), positive effects are likely to be enhanced to some degree. It is recognised that Option G also has the potential to deliver positive effects through reducing inequalities between sub-urban and urban areas, expanding upon Over Monnow, the sub-urban part of Monmouth. Over Monnow is located to the west of the River Monnow and the Monnow Bridge and identified as the third most deprived LSOAs in Monmouthshire (Overmonnow 2, ranked 520). Option I is also likely to lead to positive effects in this respect, directing growth towards rural Dixton village, located 1 mile north east of Monmouth.

In terms of ensuring access to services for more vulnerable or immobile groups in the community, such as elderly residents and young families, Option H performs most positively. This is given its central location adjacent to the town centre (approximately 0.5 miles /11-minute walk away). Option I is also considered to have good access to the town centre, its amenities and facilities, being approximately 0.7 miles or

a 13-minute walking distance. Option G is furthest from the town centre and therefore worst performing of the Options, at approximately 1.4 miles and a 28-minute walk.

Overall, it is considered that all Options perform positively against this ISA theme. Options will support the growth of and regeneration of existing communities, improving access to housing, jobs and services. In terms of ranking the Options, Option G and H are likely to deliver positive effects of greater significance than Option I as growth is targeted towards more deprived areas. Option H however is best located in terms of supporting vulnerable groups with access to services in the town centre, and Options G and I perform well through reducing inequalities between sub-urban and urban areas to the north and southeast of the town. It is therefore not considered possible to differentiate between the Options at this stage.

Transport and movement

Options	Option G – Land west of Monmouth	Option H – Land in central Monmouth	Option I – Land north east of Monmouth
Rank	=	=	=
Significant effect?	No	No	No

In terms of the strategic transport network, Monmouth occupies a key location on the road network, with strategic links between Newport (A449), Abergavenny (A40) and the Midlands (A466). While levels of self-containment are high in Monmouth, there remains a reliance on the car as the primary mode of transport, with high levels of through traffic highlighted as a significant issue for the town. Option I is best located in terms of access to the strategic road network; notably being nestled between the A40 and A466. Options G and H have good access to the A40, to the east. It is considered that development under all options is likely to result in increased vehicular use in the town with the potential for long term adverse effects.

Access to sustainable transport throughout Monmouth is reasonable. Although the town is not connected to the rail network (the nearest being Abergavenny railway station, approximately 16 miles west of all Options), it has good bus services to the South Wales cities and into Gloucestershire and Herefordshire. All Options are within 400m of a bus stop; in terms of Option G, the nearest bus stop is along Wonastow Road, 400m from the northern extent of the site. In terms of Option H, there is a bus stop adjacent to the site along Rockfield Road, and similarly for Option I, there is a bus stop adjacent to the site along Dixton Road.

All Options are assumed to have the potential to include enhancements/ improvements to services/ facilities and public transport. As set out above, the level of infrastructure delivery is expected to be equal under all Options, and therefore none of the options are better performing in this respect.

Overall, all Options perform similarly against this ISA theme, directing growth towards a Tier 1 settlement, with good access to the strategic transport network. While all Options may increase traffic through the town, it is recognised that Options are well located in terms of the bus network which is well connected with wider service centres. Option I is worst performing of the Options given its location between two A-roads which currently experience high levels of traffic and congestion at peak times. However, it is considered that all Options would utilise the strategic road network to some extent, particularly given the absence of a railway station. It is therefore considered that Options cannot be differentiated between at this stage.

Natural resources (air, land, minerals, and water)

Options	Option G – Land west of Monmouth	Option H – Land in central Monmouth	Option I – Land north east of Monmouth
Rank	1	2	3
Significant effect?	Yes - Negative	Yes - Negative	Yes - Negative

While air pollution is not a major problem in Monmouthshire it can cause significant problems for people's health. The greatest problems associated with air quality in the County are caused by vehicle emissions, and therefore Options perform positively where they seek to utilise sustainable transport opportunities; such as active travel networks, improved public transport and electric charging point infrastructure. This will help to reduce the impact of transport-based emissions and improvements in air quality. All Options are considered to perform equally in this respect, given all Options direct growth towards a Tier 1 settlement, with good access to the strategic transport network and town centre; supporting modal shift to reduce reliance on the car and subsequently reduce NO_2 emissions. However, given the absence of a railway station and the strategic road links to Newport (A449), Abergavenny (A40) and the Midlands (A466), there is likely to be a continued reliance on the private vehicle for travel.

The Agricultural Land Classification (ALC) classifies land into six grades (plus 'non-agricultural' and 'urban'), where Grades 1 to 3a are recognised as being the 'best and most versatile' land (BMV) and Grades 3b to 5 are of poorer quality. Detailed agricultural land quality surveys will be undertaken by site promoters as part of the candidate site process, and therefore at this stage ALC at each of the Options

has been based on the Predictive ALC model for Wales (2017).[67] The area containing Option I was found to be entirely Grade 2, and the area containing Option H was found to be entirely Grade 3a. The area containing Option G however was found to be partially Grade 3a and partially Grade 3b. Option G is therefore best performing of the Options, given it includes a reduced amount of BMV agricultural land.

All Options comprise entirely greenfield sites and consequently it is not possible to differentiate between them in terms of promoting the use of previously developed land. In this context it is possible to say that Option G is best performing in relation to protecting the County's soil/ land resource.

None of the Options fall within, or within close proximity to a mineral safeguarding area, and therefore all perform equally in terms of impact on the County's mineral resource. All Options are also considered to perform equally in terms of demand for water, and impact on water quality.

Overall, all Options are considered to perform equally in terms of impact on air quality, and the County's mineral and water resource. However, all Options perform negatively against this ISA theme overall with the potential for significant effects, as all Options would result in the loss of BMV agricultural land, and would not contribute towards promoting the use of brownfield land. However, it is recognised that there are limited opportunities within the County for brownfield development and development on lower grades of agricultural land. In terms of ranking the Options, Option G is best performing given it is the least constrained Option in terms of BMV agricultural land coverage. Option I is worst performing given it would result in the loss of higher quality agricultural land in comparison with Option H.

Biodiversity and geodiversity

Options	Option G – Land west of Monmouth	Option H – Land in central Monmouth	Option I – Land north east of Monmouth
Rank	**1**	**1**	**2**
Significant effect?	**Yes - Negative**	**Yes - Negative**	**Yes - Negative**

In terms of European sites, it is recognised that the HRA screening (2021) of the Preferred Strategy policies found that potential residential or employment sites in Monmouth, are likely to have nutrient neutrality implications for the River Wye SAC, because they are served by WwTWs discharging into the upper reaches of the SAC. Whilst a solution has now been identified (2024), mitigation will be required

[67] The Predictive ALC model for Wales (2017) is based on the principles of the Agricultural Land Classification System of England & Wales, the Revised Guidelines & Criteria for Grading the Quality of Agricultural Land (MAFF 1988).

(supported by RLDP policy provisions). All options therefore have the potential to lead to long term significant negative effects in this respect, and options cannot be differentiated between given the level of development is considered equal across all options.

In terms of differentiating between the options, the River Wye SAC is located approximately 600m east of Option I, approximately 1.2km east of Option H, and 1.4km east of Option G. Option I is also within 800m of the Wye Valley Woodland SAC. Taking each SAC in turn:

- **The River Wye SAC** covers the length of the River Wye, to the north east of the County, notably extending through Monmouth. The SAC contains habitats listed under Annex I of the Habitats Directive and a variety of species listed under Annex II of the Habitats Directive which are also the primary reasons for designation. The River Wye is important for its population of Atlantic salmon, and whilst stocks have declined the salmon population is still of considerable importance in UK terms. The Wye also holds the densest and most well established otter population in Wales. The site is considered one of the best in the UK for white-clawed crayfish. Other important species supported by the River Wye are twaite shad, bullhead and river, sea and brook lamprey.
- **The Wye Valley Woodland SAC** is a large woodland SAC that straddles the Wales-England border, extending along the east of the County. The site is underpinned by nine SSSIs in Wales and seven in England. The Wye Valley contains abundant and near continuous semi-natural woodland along the gorge. The variety of woodland types found are rare within the UK.

In addition to the blanket water quality issue highlighted above for all options, the HRA Screening (2021) found that there is the potential for development to significantly affect the River Wye SAC through atmospheric pollution, recreation, and water quantity, level and flow, and for development to affect the Wye Valley Woodland SAC through atmospheric pollution. As such, these sites and their potential impact pathways, will be considered in more detail through the Appropriate Assessment stage. It is therefore considered that all Options have the potential to indirectly impact upon the SACs. Potential strategic growth areas have been identified as needing to be screened in for further detailed consideration through the HRA process. Given the proximity of Option I to both SACs, it is considered that this Option has the potential to lead to negative effects of greatest significance.

There is a range of nationally and locally designated biodiversity located around Monmouth. Some of these designations fall within or have the same boundaries as the European sites considered through the HRA and outlined above, although they may have different designated features and sensitivities in some cases. Despite this, the impact pathways identified earlier for European sites are also applicable/ relevant to nationally and locally designated sites and wider biodiversity interests. Notably, as discussed above, Options have the potential to impact on the River Wye SSSI through atmospheric pollution, recreation, water quality and water quantity, level and flow. Option I has the potential to impact on the Wye Valley Woodlands SSSI/ National Nature Reserve through atmospheric pollution.

Options are not constrained by locally designated sites; however, it is recognised that all sites are greenfield, and may have the potential to hold biodiversity value. Notably, there are hedgerows/trees/ dense scrub extending along the field boundaries of Option G, and there is a corridor of mature trees running along the boundary of Option I. Therefore, development at Option I, and to a lesser extent Option G, has

the potential to lead to negative effects on biodiversity through direct loss of habitats and associated species present, in addition to potential for indirect negative effects as a result of increased disturbance, noise, light and air pollution. Consideration should be given under all Options for the potential to deliver positive effects through retaining and enhancing biodiversity where possible; delivering net-gain. This may include creating/ expanding upon ecological corridors and enabling habitat connectivity; notably through Option I.

Overall, all Options have the potential to lead to long term significant negative effects on biodiversity as a result of nutrient neutrality implications for the River Wye SAC. Additionally, all Options have the potential to adversely impact upon the River Wye SAC/ SSSI and the Wye Valley Woodland SAC/ SSSI/ National Nature Reserve to the east of the settlement. In terms of ranking the options, given the proximity of Option I to both SACs, and the biodiversity present at the Option itself, it is considered that this Option has the potential to lead to negative effects of greatest significance. It is considered that Options G and H perform similarly in relation to the biodiversity ISA theme. All Options have the potential to deliver positive effects through biodiversity enhancement/ net gain.

Historic environment

Options	Option G – Land west of Monmouth	Option H – Land in central Monmouth	Option I – Land north east of Monmouth
Rank	1	2	3
Significant effect?	Uncertain	Uncertain	Uncertain

There are no designated heritage assets within or in close proximity to Option G. This growth area is approximately 500m from the significant number of heritage assets present within the settlement and separated by the existing built up area. It's possible that the site could accommodate development without any significant residual negative effects on the historic environment as long it is sensitively designed.

There are no designated heritage assets within or adjacent to Option H. There are a number of listed buildings to the north east and east in close proximity to the River Monnow. To the south east of the growth area lies the Monmouth (Central) Conservation Area which includes a significant number of listed buildings. There are also a number of scheduled monuments, including Monmouth Castle. It's possible that the site could accommodate development without any significant residual negative effects on the historic environment as long it is sensitively designed, and the layout takes account of any important views into and from the designated heritage assets in the wider area, including the Monmouth (Central) Conservation Area. However, this is uncertain at this stage.

There are no designated heritage assets within Option I; however, there is the Monmouth (Dixton) Conservation Area to the south east which contains two scheduled monuments and five listed buildings. There are also three listed buildings to the north west on the other side of the A466. The boundary of the Monmouth (Central) Conservation Area extends up the A466 near the south of the growth area. It's possible that the site could accommodate development without any significant residual negative effects on the historic environment as long it is sensitively designed, and the layout takes account of any important views into and from the designated heritage assets in the wider area, including the Monmouth Central and Dixton Conservation Areas, listed buildings and scheduled monuments. However, this is uncertain at this stage.

Cadw, Natural Resources Wales and the International Council on Monuments and Sites (ICOMOS UK) has compiled a non-statutory Register of 58 Landscapes of Outstanding or Special Historic Interest in Wales. Option I is adjacent to a Landscapes of Outstanding or Special Historic Interest, to the south west of the Option.

It is recognised that Monmouthshire's cultural assets also include the use of the Welsh language. The RLDP is not considered likely to have a significant effect on the Welsh language, and therefore no significant differences have been identified between the Options in this respect.

Overall, Option G is less sensitive in terms of the historic environment and development in this area is therefore less likely to result in a residual negative effect compared to the other options. It is not possible to identify any significant differences between Options H and I at this stage and the nature and significance of effects are uncertain and dependent on the precise scale, layout and design of growth.

Landscape

Options	Option G – Land west of Monmouth	Option H – Land in central Monmouth	Option I – Land north east of Monmouth
Rank	1	2	2
Significant effect?	Uncertain	Yes - Negative	Yes - Negative

As a largely rural county Monmouthshire has major landscape resources and is home to internationally and nationally designated landscapes. Looking specifically at Monmouth, the area immediately south east of the settlement is the Wye Valley National Landscape (formerly Area of Outstanding Natural Beauty (AONB)). Planning Policy Wales (2018) gives National Parks and National Landscapes (AONBs) equal status in terms of landscape and scenic beauty, recognising that these designated assets should be *"valued for their*

intrinsic contribution to a sense of place, and that their special characteristics should be protected and enhanced."[68] In addition to national policy requirements, protection is also provided to the Wye Valley through the Wye Valley AONB Management Plan (2021), which sets out themes and aims for the AONB (now National Landscape). Given the location of the Options to the west and north of Monmouth, it is not considered that any of the Options will impact on the National Landscape (AONB) or its setting.

Cadw, Natural Resources Wales and the International Council on Monuments and Sites (ICOMOS UK) has compiled a non-statutory Register of 58 Landscapes of Outstanding or Special Historic Interest in Wales. Option I is adjacent to a Landscapes of Outstanding or Special Historic Interest, to the south west of the Option.

It is also noted that Option H is considered to have a high amenity value and is designated in the current adopted LDP as an 'Area of amenity importance' under Policy DES2 (Areas of Amenity Importance). In accordance with Policy DES2 *"development proposals on areas of amenity importance will only be permitted if there is no unacceptable adverse effect on the visual and environmental amenity of the area, including important strategic gaps, vistas, frontages and open spaces […or…] linked areas of green infrastructure in terms of its contribution to the character of the locality".* The delivery of Option H therefore has the potential to impact upon the important qualities of this area, with the potential for long term negative effects.

A Landscape Capacity Update study has been carried out for the County (2020), which identifies Local landscape Character Areas (LLCAs) and provides an overall analysis of each LLCA's sensitivity to residential development.[69] Overall, the study has found that there is capacity for housing in Monmouthshire focussing on the larger settlements; which includes Monmouth. However, looking specifically at the Options in turn:

- **Option G** is categorised as high to medium landscape sensitivity to residential development.
- **Option H** is categorised as high/medium sensitivity to residential development.
- **Option I** is categorised as having a high/medium sensitivity to residential development.

Overall, Option G is less sensitive in terms of the landscape, and development in this area is therefore less likely to result in a residual negative effect compared to the other Options. Given uncertainties no significant differences between Options H and I in terms of the nature and significance of effects could be identified at this stage, and will likely be dependent on the precise scale, layout and design of growth. Furthermore, both options are identified as having high/medium sensitivity to development through the Landscape Sensitivity Update Study (2020), and are both constrained by landscape designations (Option I is located adjacent to a Landscape of Outstanding or Special Historic Interest, while Option H is designated in the current adopted LDP as an 'Area of amenity importance). Options H and I are therefore ranked

[68] Welsh Government (2018) Planning Policy Wales
[69] White Consultants (2009) Monmouthshire Landscape Sensitivity and Capacity Study

equally, with the potential for negative effects. For all Options, mitigation (which reduces the extent of development to avoid the most sensitive areas) is considered likely to reduce the significance of the potential negative effects. However, this is uncertain at this stage and will be dependent on the design/ layout and implementation of specific mitigation measures.

Climate change (including flood risk)

Options	Option G – Land west of Monmouth	Option H – Land in central Monmouth	Option I – Land north east of Monmouth
Rank	**=**	**=**	**=**
Significant effect?	**Uncertain**	**Uncertain**	**Uncertain**

Monmouthshire's rurality, limited public transport, high levels of car ownership and the subsequent reliance on the private car, combined with high energy consumption can all contribute to carbon emissions. Monmouthshire County Council declared a climate emergency in May 2019, and as such growth Options will be required to contribute positively towards meeting the Council's aim of reducing its net carbon emissions to zero by 2030.

In relation to climate change adaptation, key issues include the need to capitalise upon opportunities to design-in low carbon infrastructure to development from the outset, and therefore minimise additional CO_2 emissions associated with development. There are no significant differences between the Options in terms of opportunities to design-in low carbon infrastructure, i.e., given there is no difference in quantum of housing growth between Options.

All Options also present an opportunity to support adaptation to the potential effects of climate change through providing improvements to the local green infrastructure network. As above, it is considered that all options are able to deliver a similar level of infrastructure, and as such all Options perform equally in this respect.

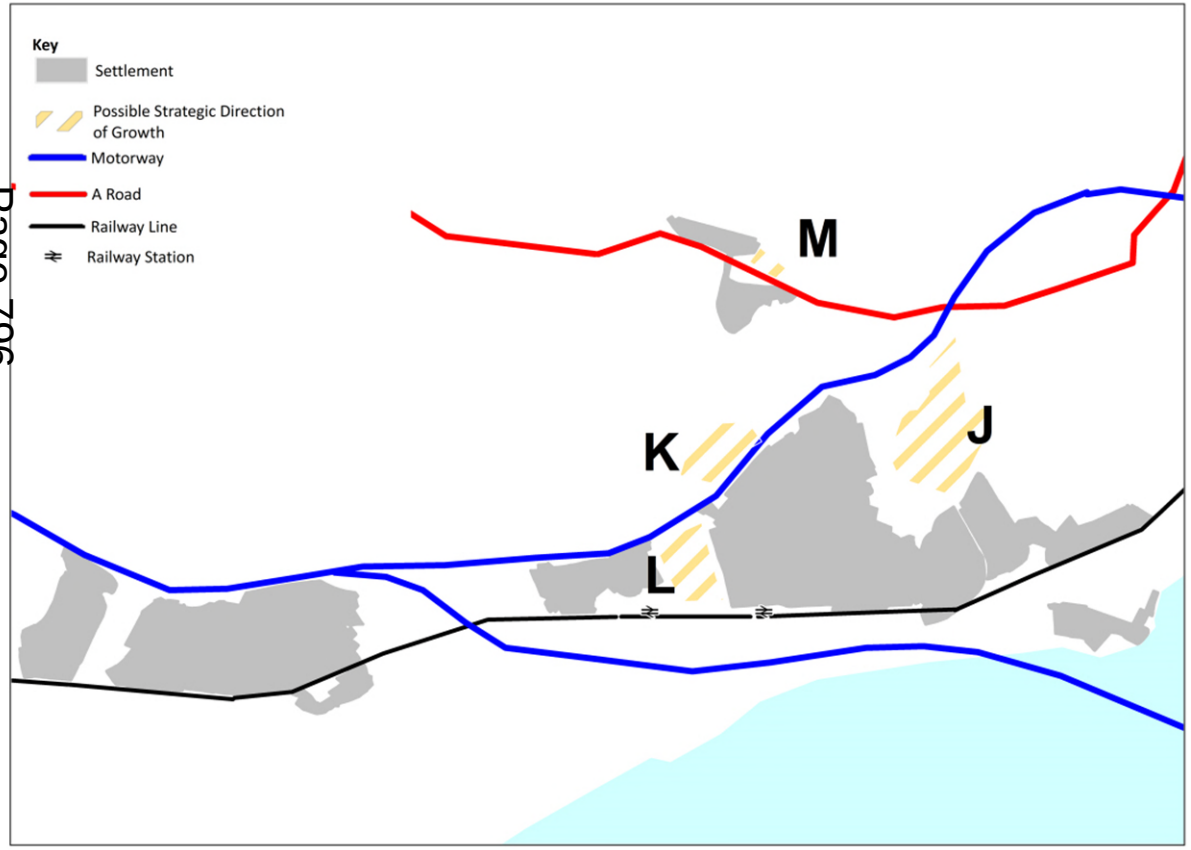
It is considered that there is the potential to reduce greenhouse gas emissions by reducing the need to travel and encouraging the use of sustainable transport modes. Notably, the Active Travel (Wales) Act (2013) requires all local authorities in Wales to deliver improvements to their network of active travel routes and facilities. All Options perform reasonably well in this respect through directing growth towards a Tier 1 settlement; however, given the absence of a railway station, the existing high levels of congestion in the town and the presence of the often congested A40 and A466, there may be a continued reliance on the private vehicle for travel.

In terms of managing flood risk to address climate change, it is recognised that the floodplain of the River Wye is a constraint throughout the centre of the town and in parts of Over Monnow. However, all Options are located away from areas at high risk of flooding, within Flood Zone A.

Overall, development proposed at the individual Option scale is not likely to have a significant positive or negative effect on climate change when considered in isolation. It is anticipated that this will be addressed through the RLDP policy framework. All Options perform on a par in terms of potential flood risk and seek to support the uptake of sustainable travel where possible. However, given the presence of the A40, A466, and absence of a railway station, there is likely to be a continued reliance on the car as the primary mode of travel. Effects on climate change are therefore uncertain.

Severnside options

- Option J: Land north-east of Caldicot.
- Option K: Land north-west of Caldicot.
- Option L: Land west of Caldicot/ east of Rogiet; and
- Option M: Land east of Caerwent.



Economy and employment

Options	Option J – Land north east of Caldicot	Option K – Land north west of Caldicot	Option L – Land west of Caldicot	Option M – Land east of Caerwent
Rank	**2**	**2**	**1**	**3**
Significant effect?	**No**	**No**	**No**	**No**

Caldicot is classified as a Primary Settlement within the RLDP settlement hierarchy and has functional transport links with the smaller settlements of Rogiet, Caerwent, Portskewett, Sudbrook and Crick, which together are considered to share characteristics to make up the identifiable group of Severnside. The Severnside area has an important role as the 'Gateway to Wales', with the area immediately adjacent to the Second Severn Bridge (Prince of Wales Bridge) crossing, and as a whole is well located for the nearby employment markets of Newport, Cardiff and Bristol. There are key rail links to these employment markets with stations at Rogiet and Caldicot connecting with the key settlements of Cardiff in the West and Bristol /Cheltenham/Midlands in the east. There are also good road links to the M4 and M48 motorways, with the M4 Junction at Magor and Undy. The A48 also runs across the north of the Severnside region connecting settlements along the A48 with settlements in Newport to the west, and Chepstow to the east. It is considered that Option L is the most well connected in this respect, with access to the M48 immediately to the north, and M4 and railway stations immediately to the south. Option M is the least well connected given its location along an A-road, furthest away from the M4 corridor and rail line.

In terms of facilities and services present, Caldicot and Magor and Undy are identified as higher tier settlements and therefore provide the greatest range of services and facilities of all the Severnside settlements. Option L therefore performs most positively of the options, given it is 1 mile/ 19-minute walking distance from Caldicot town centre. Following this, Option K is approximately 1.4 miles, a walking distance of 26 minutes; and Option J is approximately 1.9km and approximately 22-minutes walking distance. Option M is 2.1 miles from Caldicot town centre, although it is appreciated there are some limited facilities, such as a Post Office, in the nearest settlement of Caerwent.

Employment sites are present throughout the Severnside area. Notably, Severnside Industrial Estate is located to the south east of Caldicot, which is a significant employment base and separates Caldicot from neighbouring Portskewett. Options J and L are best performing in terms of access to this employment site, given these Options would extend the built settlement of Caldicot, south of the M48. Option K followed by Option M is less well located in this respect; however, they are still considered to be able to access the site. There is also land allocated for employment to the North West of Magor/ Undy with the established Magor Brewery site and Wales One Business Park. These sites are relatively distant from all Options; however, they still have the potential to be capitalised upon via the M48/M4 corridor.

All Options have the potential to include employment land and infrastructure delivery to support the town, encouraging inward investment and supporting local economic growth. It is considered that all Options would be able to deliver a similar level of infrastructure, and therefore Options cannot be differentiated between in this respect. Nonetheless, it is considered that the delivery of infrastructure alongside development has the potential to lead to positive effects against this ISA theme, although this is uncertain at this stage.

Overall, all Options are anticipated to lead to long-term positive effects against this ISA theme. Option L is best performing as it is most centrally located in terms of access to services and facilities in Caldicot town centre, has good access to road links to the M4 and M48 motorways to access outside employment markets, and is within reasonable distance of employment opportunities to the south of the town. Option M performs least well of the Options given its poor access to Severnside centres, poor access to employment sites within Severnside, and limited potential to capitalise upon the strategic road network.

Population and communities

Options	Option J – Land north east of Caldicot	Option K – Land north west of Caldicot	Option L – Land west of Caldicot	Option M – Land east of Caerwent
Rank	1	2	1	3
Significant effect?	Yes - Positive	Yes - Positive	Yes - Positive	Yes - Positive

All Options perform equally in terms of providing sufficient housing to meet the identified housing needs of the community, as it is assumed that all Options could deliver the same quantum of growth. Long term significant positive effects are predicted in this respect.

All Options will lead to positive effects through capitalising upon the recent removal of the Severn Bridge Tolls and the ambitions and opportunities associated with the Cardiff Capital Region City Deal and the South East Wales Metro. Utilising these strategic economic links will contribute positively towards delivering sustainable communities, achieving infrastructure improvements/ provision in the south of the County. It is considered that Option L is the most well connected in this respect, with access to the M48 immediately to the north, and M4 and railway station immediately to the south. Option M is the least well connected given its location along an A-road, furthest away from the M4 corridor and rail line.

In terms of integrating with existing communities/ settlements, Option L performs most positively as it would infill between Rogiet to the west and Caldicot to the east. Option J would also perform positively in this respect through extending Caldicot to the north east. However, while Options J and L have the potential to deliver positive effects in terms of promoting the growth of existing communities; Option L may also lead to the coalescence of Rogiet and Caldicot, with the potential for negative effects in terms of settlement/ community identity.

Option K performs less well given the Option is detached from Caldicot by the M48, and therefore would likely be isolated to some extent from the existing settlement to the south. Residents would likely be reliant on the car to access services and facilities in Caldicot and would perform less positively than Options J and L in terms of supporting sustainable communities. This is also likely to be the case through growth at Option M, however, this option is arguably least well performing as it is in a less sustainable location, north of the M4 corridor. Option M would however likely positively integrate with Caerwent; delivering positive effects to this settlement through infrastructure delivery and subsequent improved accessibility.

Overall, it is therefore considered that Option L, followed by Option J perform most positively in terms of enhancing the Severnside area, integrating with key settlements, and the opportunity to utilise opportunities associated with the Cardiff Capital Region City Deal and the South East Wales Metro. Option K, while adjacent to the M48/ M4 strategic transport network and in close proximity to Caldicot, performs less well as it is severed from the community by the motorway. Option M performs least well given its relative detachment from the M4 corridor and the main town of Caldicot; and subsequent reduced potential to deliver sustainable communities.

Health and wellbeing

Options	Option J – Land north east of Caldicot	Option K – Land north west of Caldicot	Option L – Land west of Caldicot	Option M – Land east of Caerwent
Rank	2	2	1	3
Significant effect?	No	No	No	No

There are two GP surgeries located within the Severnside area within close proximity to the Options; Gray Hill Surgery and Portskewett Surgery. Options J, K and L are all within 1km / 20-minute walk of a GP practice, while Option M is 2.4 miles (drive) from Portskewett Surgery.

In terms of wider health facilities, the Grange University Hospital, is located in Cwmbran, is approximately 24.7km from Options K and L, 24km from Option M, and 26.4km from Option J. Option M is worst performing in terms of access to a GP, while all Options perform on a par in terms of access to a hospital and wider health services.

Within the Severnside area, Caldicot and Magor and Undy have been classified as higher tier settlements which have functional transport links. The Severnside area, has an important role as the ‘Gateway to Wales’, with the area immediately adjacent to the Second Severn Bridge (Prince of Wales Bridge) crossing, providing access to Newport, Cardiff and Bristol. Railway stations at Rogiet and Caldicot connect with the key settlements of Cardiff in the west and Bristol/ Cheltenham/ Midlands in the east. Option L is best located in terms of access to

Caldicot railway station and the Severn Tunnel Junction at Rogiet; being 0.5 miles/ 10-minute walking distance from the Caldicot station. Option K is 800m from Caldicot station, however this would involve crossing the M48. Option J is 1.1 mile / 22-minute walk from the station; and Option M is furthest away, 2.5 miles to the north. In terms of bus services in the area, Options L and M are well located; Option L is located adjacent to bus services on Rogiet Road and Longfellow Road, and Option M is within 400m of a bus stop just off the A48. Options K and J are however less well located; Option K is detached from bus services extending through Caldicot by the M48, and Option J is distant from bus services on the B245m detached by the Country Park.

While not sustainable transport options, it is worth noting that there are good road links from the Options to the M4 and M48 motorways; including the M4 Junction at Magor and Undy. The A48 also runs across the north of the Severnside region connecting settlements along the A48 with settlements in Newport to the West, and Chepstow to the East. It is considered that Option L is the most well connected in this respect, with access to the M48 immediately to the north, and M4 and railway stations immediately to the south.

Options located in close proximity to the motorway also have the potential to perform negatively against this ISA theme as a result of potential impacts on residents' health (i.e., through atmospheric and noise pollution). The Department of Transport's Transport Analysis Guidance outlines that, within 200m, the contribution of vehicle emissions from the roadside to local pollution levels is significant.[70] Options J and K perform most negatively in this respect given their location adjacent to the motorway. However, it is noted that the nature and significance of effects are uncertain and dependent on the precise scale, layout and design of growth.

Overall, Option L performs particularly well in terms of proximity to health services and supporting healthy forms of transport to reach health (and wider) services/ facilities /employment. Options J and K perform relatively on a par against this ISA theme, with Option M performing least positively. This is given that in comparison to other Options, Option M is detached from health facilities and sustainable travel opportunities in the key Severnside settlements (namely Caldicot).

[70] http://www.dft.gov.uk/webtag/documents/expert/unit3.3.3.php#013

Equalities, diversity, and social inclusion

Options	Option J – Land north east of Caldicot	Option K – Land north west of Caldicot	Option L – Land west of Caldicot	Option M – Land east of Caerwent
Rank	**2**	**3**	**1**	**4**
Significant effect?	**No**	**No**	**No**	**No**

Within the Severnside area, Caldicot and Magor and Undy have been classified as higher tier settlements and as such, expanding upon built form through all Options will lead to positive effects in terms of supporting and sustaining a hierarchy of vibrant centres across the County, focussing development in accordance with recent population growth data. Positive effects are predicted for residents' quality of life, creating more positively integrated communities.

None of the growth options fall within areas of significantly high deprivation. As highlighted above, development at all Options will support equal communities with improved accessibility to services, employment, and affordable housing; however, it is considered that by targeting the most deprived communities through Option L, positive effects are likely to be enhanced to some degree.

Option J itself is the least deprived of the Options and will likely deliver increased positive effects through reducing inequalities between sub-urban and urban areas; expanding upon Portskewett village located to the east of Caldicot.

Options that are well located in terms of sustainable settlements also perform positively through ensuring access to services for more vulnerable or immobile groups in the community, particularly elderly residents and young families, and especially those without access to private vehicles. Option L is best performing in this respect given its location nestled between two existing communities that are well supported in terms of infrastructure provision and sustainable travel opportunities. Options J and K also perform positively in this respect; however, it is noted that Option J is slightly detached from the main centre, and Option K is detached from existing communities by the M48. Option M performs least positively given it is not well connected with sustainable centres, services and facilities.

Overall, it is considered that all Options perform positively against this ISA theme through supporting the growth of and regeneration of existing communities, improving access to housing, jobs and services. However, positive effects are likely to be less significant through Option M, given its comparative detachment from the Severnside area. Option L is predicted to lead to positive effects of greatest significance through targeting deprived areas to the east of the Option. This will promote equality, developing more inclusive communities in a sustainable location.

Transport and movement

Options	Option J – Land north east of Caldicot	Option K – Land north west of Caldicot	Option L – Land west of Caldicot	Option M – Land east of Caerwent
Rank	**2**	**2**	**1**	**3**
Significant effect?	**No**	**No**	**No**	**No**

In terms of the strategic transport network, the Severnside area has an important role as the gateway to Wales on the M4, with the M4 Junction at Magor and Undy. The A48 also runs across the north of the Severnside region connecting settlements along the A48 with Newport to the West, and Chepstow to the East. Levels of self-containment throughout the Severnside area are very low, holding the characteristics of a 'dormitory' area with high amounts of out-commuting and reliance on the car as the primary mode of travel. There are however, more recently, significant employment bases present at Magor, Undy, Rogiet and Portskewett; increasing traffic levels throughout the settlements and across the M4 corridor. It is considered that Option L is the most well connected in this respect, with access to the M48 immediately to the north, and M4 to the west of Magor Undy. Option M is the least well connected given its distance, comparatively, from the M4 corridor.

Given the location of all Options to the south of the County, it is considered that development under all Options is likely to result in increased vehicular use throughout the Severnside area, with the potential for long term negative effects. However, it is noted that all Options will deliver long term positive effects through capitalising upon the recent removal of the Severn Bridge Tolls and the ambitions and opportunities associated with the Cardiff Capital Region City Deal and the South East Wales Metro. Utilising these strategic transport links will contribute positively towards delivering sustainable communities, achieving infrastructure improvements/ provision in the South of the County.

Access to sustainable transport throughout the Severnside area is good. Caldicot and Rogiet (at Severn Tunnel Junction station) have rail links to Newport and Cardiff to the west and Bristol/ Cheltenham/Midlands in the east. Option L is best located in terms of access to Caldicot station, being 0.5 miles/ 10-minute walking distance away. While Option K is within 800m of the station, this would involve crossing the M48, and is therefore not seen to be particularly accessible. Option J is 1.1 mile/ 22-minute walk from the station; and Option M is furthest away, 2.5 miles to the north. In terms of bus services in the area, Options L and M are well located; Option L is located adjacent to bus services on Rogiet Road and Longfellow Road, and Option M is within 400m of a bus stop just off the A48. Options K and J are however less well located; Option K is detached from bus services extending through Caldicot by the M48, and Option J is distant from bus services on the B245 detached by the Country Park. Option L therefore performs most positively overall given its location in close proximity to the

railway station, and subsequently the increased opportunity to encourage modal shift for shorter journeys both within Caldicot and Rogiet, and for wider commuter journeys.

All Options are assumed to have the potential to include enhancements/ improvements to services/ facilities and public transport. As set out above, the level of infrastructure delivery is expected to be equal under all Options, and therefore none of the options are better performing in this respect.

Overall, all Options perform well against this ISA theme, directing growth towards the south of the County and more specifically around the M4 corridor, capitalising upon strategic transport links and opportunities associated with the Cardiff Capital Region City Deal and the South East Wales Metro. Option L is best performing given its location along the M4 corridor, nestled between Caldicot and Rogiet, and its ability to capitalise upon sustainable transport infrastructure and encourage modal shift. Options J and K perform relatively on a par in this respect, with Option M performing least positively. This is given that in comparison to other Options, Option M is detached from sustainable travel opportunities in the key Severnside settlements (namely Caldicot and Rogiet) and the wider M4 corridor.

Natural resources (air, land, minerals, and water)

Options	Option J – Land north east of Caldicot	Option K – Land north west of Caldicot	Option L – Land west of Caldicot	Option M – Land east of Caerwent
Rank	2	2	1	2
Significant effect?	Yes - Negative	Yes - Negative	Yes - Negative	Yes - Negative

While air pollution is not a major problem in Monmouthshire it can cause significant problems for people's health. The greatest problems associated with air quality in the County are caused by vehicle emissions, and therefore Options perform positively where they seek to utilise sustainable transport opportunities; such as active travel networks, improved public transport and electric charging point infrastructure. This will help to reduce the impact of transport-based emissions and improvements in air quality. Option L is best performing in this respect, given its sustainable location nestled between Caldicot and Rogiet, and its ability to capitalise upon sustainable transport infrastructure (such as the Severn Tunnel Junction station) and encourage modal shift. Option M performs least positively given it is detached from sustainable transport along the M4 corridor and within/ surrounding Caldicot, with high reliance on the car for travel anticipated.

The Agricultural Land Classification (ALC) classifies land into six grades (plus 'non-agricultural' and 'urban'), where Grades 1 to 3a are recognised as being the 'best and most versatile' land (BMV) and Grades 3b to 5 are of poorer quality. Detailed agricultural land quality

surveys will be undertaken by site promoters as part of the candidate site process, and therefore at this stage ALC at each of the Options has been based on the Predictive ALC model for Wales (2019).[71] The area of all Options is predominately Grade 1 agricultural land. The exception to this is approximately 1/3 of Option K which is Grade 3b land; and Option L includes areas of Grade 2, Grade 3b and Grade 4 land to the north east of the Option. Options L and K are therefore best performing in this respect as they would necessitate the least amount of loss of BMV land.

All Options comprise entirely greenfield sites and consequently it is not possible to differentiate between them in terms of promoting the use of previously developed land. In this context it is possible to say that Options L and K perform better than Options J and M in relation to protecting the County's soil/ and resource.

Monmouthshire's mineral resource is focused to the south of the County, with part of Option M and Option K falling within a limestone minerals safeguarding area. Options J and L are therefore best performing in terms of protecting the County's mineral resource; however, in accordance with national and regional policy requirements, it is considered that a sustainable approach will be adopted to development within mineral safeguarding areas.

All Options are considered to perform equally in terms of demand for water, and impact on water quality.

Overall, all Options perform negatively against this ISA theme given development at each option would result in the loss of BMV agricultural land, and would not contribute towards promoting the use of brownfield land. However, it is recognised that there are limited opportunities within the County for brownfield development and development on lower grades of agricultural land. Option L is best performing given it is well located in terms of potential to utilise sustainable travel and improve air quality; is the least constrained in terms of Grade 1 agricultural land coverage; and is not located within a minerals safeguarding area. It is difficult to differentiate between all other Options at this stage.

[71] The Predictive ALC model for Wales (2017) is based on the principles of the Agricultural Land Classification System of England & Wales, the Revised Guidelines & Criteria for Grading the Quality of Agricultural Land (MAFF 1988).

Biodiversity and geodiversity

Options	Option J – Land north east of Caldicot	Option K – Land north west of Caldicot	Option L – Land west of Caldicot	Option M – Land east of Caerwent
Rank	3	2	3	1
Significant effect?	Uncertain	Uncertain	Uncertain	Uncertain

In terms of European sites, the Severn Estuary Special Area of Conservation (SAC), Special Protection Area (SPA)/ Ramsar site are located 900m south of Option L, 1.2km south of Option J, and over 2km from Options K and M. The Severn Estuary is the largest coastal plain estuary in the UK with the second highest tidal range in the world. The site covers the southern extent of the County, and contains habitats listed under Annex I of the Habitats Directive. These include estuaries, mudflats and sandflats. In addition to Annex I habitats present, primary reasons for designation are species listed under Annex II of the Habitats Directive including Sea lamprey, River lamprey and Twaite shad.

- Primary reasons for the SPA designation is that the site qualifies as an area of Internationally Important Assemblage of Birds, under Article 4.2, where over the winter the area regularly supports 84,317 waterfowl.
- Primary reasons for Ramsar designation is that there are eight criterions that are within the Ramsar designation. This includes the immense tidal range creating diversity of the physical environment and biological communities, and due to unusual estuarine communities, reduced diversity and high productivity.
- This site is also designated due to the importance for the run of migratory fish between sea and river via the estuary. It is also of particular importance for migratory birds during spring and autumn.

HRA Screening (2019) of the Preferred Strategy policies found that there is the potential for development to significantly affect the Severn Estuary SAC through atmospheric pollution, recreation, water quality and water quantity, level and flow; and for development to affect the SPA/ Ramsar site through atmospheric pollution, recreation, loss of functionally linked land, water quality and water quantity, level and flow. As such, the Severn Estuary, and potential impact pathways, will be considered in more detail through the Appropriate Assessment stage. It is therefore considered that all Options have the potential to indirectly impact upon the SAC/ SPA/ Ramsar site. Potential strategic growth areas have been identified as needing to be screened in for further detailed consideration through the HRA process. However, given the distance of the Options to the SPA/ SAC/ Ramsar site; it is considered that only Options L and J have the potential to lead to significant effects.

There is a range of nationally and locally designated biodiversity located around the Severnside area. Some of these designations fall within or have the same boundaries as the European sites considered through the HRA and outline above, although they may have different designated features and sensitivities in some cases. Despite this, the impact pathways identified earlier for European sites are also applicable/ relevant to nationally and locally designated sites and wider biodiversity interests. Notably, as discussed above, Options have the potential to impact on the Severn Estuary SSSI through atmospheric pollution, recreation, loss of functionally linked land, water quality and water quantity, level and flow.

Options J and K are constrained by Ancient Woodland at Farthing Hill (adjacent to Option J) and Woodland Valley (to the north east of Option K). There is the potential for development at Options J and K to adversely impact upon biodiversity present at Farthing Hill and Woodland Valley through increased disturbance, noise, light and air pollution. There is also the potential to deliver positive effects through biodiversity net-gain, this may include creating ecological corridors and aiding connectivity between sites.

Options are not constrained by locally designated sites; however, it is recognised that all sites are greenfield, and may have the potential to hold biodiversity value. Notably, Option K includes scattered pockets of hedges/ dense scrub and linear tree/ hedgerow habitats. It is noted that Dewston Garden and Grottoes Park is located adjacent to the site to the west, which is rich in biodiversity and may hold connectivity with biodiversity present within the Option. In terms of Option M, mature trees/ hedgerows densely line the site boundary to the south along the A48, and there is a patch of woodland to the east of the site further along the A48 extending north. Option L also has hedgerows lining the field parcels within the Option, and there are sparse mature trees present throughout Option J. There is the potential for development across the Options to lead to negative effects on biodiversity through direct loss of habitats and any associated species. Development should seek to retain and enhance these habitats where possible, ensuring no net loss, and seek to deliver significant positive effects through biodiversity net gain. Notably Options have the potential to strengthen connectivity across the Options and with the wider biodiversity network.

Overall, all Options have the potential to lead to adverse effects in terms of the biodiversity ISA theme. Options L and J have the potential to lead to significant adverse effects on biodiversity, given the presence of the Severn Estuary SPA/ SAC/ Ramsar site/ SSSI within 900m and 1.2km of the Options, respectively. In terms of wider biodiversity effects, it is considered that Option K performs less well than other Options given the close proximity of Woodland Valley (Ancient Woodland), the presence of Dewston Garden and Grottoes Park adjacent to the Option, and the variety of biodiversity present within the Option itself. Option J is also constrained in terms of Ancient Woodland located adjacent to the Option at Farthing Hill, however, holds limited biodiversity within the Option. Option M is identified as best performing, given it is the least constrained of the Options in terms of potential impact on biodiversity designated sites, and overall biodiversity value. It is however also noted that there is the potential for Options to deliver positive effects through biodiversity enhancement/ net gain.

Historic environment

Options	Option J – Land north east of Caldicot	Option K – Land north west of Caldicot	Option L – Land west of Caldicot	Option M – Land east of Caerwent
Rank	3	2	1	2
Significant effect?	Uncertain	Uncertain	Uncertain	Uncertain

There are no designated heritage assets within Option M; however, it is in close proximity to the Caerwent Conservation Area, Caerwent Roman City Scheduled Monument and a number of listed buildings. It's possible that the site could accommodate development without any significant residual negative effects on the historic environment as long it is sensitively designed, and the layout takes account of any important views into and from the Caerwent Conservation Area. However, this is uncertain at this stage. The Option is separated from the heritage assets by the A48 and is also adjacent to existing residential development, which should help to reduce impacts as a result of development in this area.

Development at Option K would extend the settlement of Caldicot to the North West, which would cross the boundary of the M48 motorway and encroach upon designated heritage settings in Caerwent, including the Caerwent Conservation Area. The Dewstow House Historic Park and Garden, which contains four listed buildings is located adjacent to the growth area in the south-west and development here has the potential to directly affect its setting, particularly though loss of greenfield land which is likely to contribute to the character of this area. It's possible that the site could accommodate development without any significant residual negative effects on the historic environment as long it is sensitively designed, and the layout takes account of any important views into and from the Caerwent Conservation Area and Dewstow House Park. However, this is uncertain at this stage.

Development at Option J would likely lead to some development within the Caldicot Conservation Area, which also contains Caldicot Castle Grade I listed building and Scheduled Monument covering the unoccupied parts. Development within this growth area would result in the loss of large areas of greenfield/ open space in the setting of the castle which is also a Country Park. On this basis, the potential for a permanent significant negative effect on the historic environment as a result of strategic development in this area is identified; however, there is some uncertainty at this stage.

There are no designated heritage assets within Option L, which is also largely contained by the M48 in the north, railway line in the south and existing urban areas in the east and west. It's possible that the site could accommodate development without any significant residual negative effects on the historic environment as long it is sensitively designed.

Cadw, Natural Resources Wales and the International Council on Monuments and Sites (ICOMOS UK) has compiled a non-statutory Register of 58 Landscapes of Outstanding or Special Historic Interest in Wales. None of the Options fall within, or adjacent to these Landscapes of Outstanding or Special Historic Interest.

It is recognised that Monmouthshire's cultural assets also include the use of the Welsh language. The RLDP is not considered likely to have a significant effect on the Welsh language, and therefore no significant differences have been identified between the Options in this respect.

In summary, Option L is less sensitive in terms of the historic environment and development in this area is therefore less likely to result in a residual negative effect compared to the other options. Whilst uncertainties exist, Option J is considered to have greater potential for significant residual negative effects. It is not possible to identify any significant differences between Options K and M at this stage and the nature and significance of effects are uncertain and dependent on the precise scale, layout and design of growth.

Landscape

Options	Option J – Land north east of Caldicot	Option K – Land north west of Caldicot	Option L – Land west of Caldicot	Option M – Land east of Caerwent
Rank	3	3	2	1
Significant effect?	Yes - Negative	Yes - Negative	Uncertain	Uncertain

As a largely rural county Monmouthshire has major landscape resources and is home to internationally and nationally designated landscapes. Looking specifically at the Severnside area, while the area is not constrained by international or national landscape designations, it is noted that the west of Caldicot is separated by an important Green Wedge from Rogiet. This Green Wedge covers Option L, and it is therefore considered that development at this location could lead to coalescence between these two settlements; affecting the degree of physical and visual separation, as well as the visual impact upon the surrounding landscape.

Cadw, Natural Resources Wales and the International Council on Monuments and Sites (ICOMOS UK) has compiled a non-statutory Register of 58 Landscapes of Outstanding or Special Historic Interest in Wales. None of the Options fall within, or adjacent to these Landscapes of Outstanding or Special Historic Interest.

A Landscape Capacity Update study has been carried out for the County (2020), which identifies Local landscape Character Areas (LLCAs) and provides an overall analysis of each LLCA's sensitivity to residential development.[72]

Overall, the study has found that there is capacity for housing in Monmouthshire focussing on the larger settlements; which includes Caldicot and Magor & Undy, as higher tier settlements within the Severnside area. However, looking specifically at the Options in turn:

- **Option J** is categorised as having a high-medium sensitivity to residential development.
- **Option K** is categorised as having a high-medium sensitivity to residential development.
- **Option L** is categorised as having a medium sensitivity to residential development.
- **Option M** is categorised as having a medium-low sensitivity to residential development.

Development of Option M would likely extend the settlement of Caerwent to the east, north of the A48. Development would significantly increase the size of Caerwent, altering the character of the settlement and village identity, and may set precedent for further growth to the east, along the A48.

Given uncertainties no significant differences between the Options in terms of the nature and significance of effects could be identified at this stage. They could all potentially affect the character and setting of the settlement and wider landscape, depending on the design and layout of development. Despite this, it is possible to rank them; assuming that the same scale/ type of development would be delivered within the strategic growth areas, the differences identified between them at this stage mainly reflect the Landscape Sensitivity and Capacity Study (2009) findings. Option J and Option K are identified as worst performing of the Options, given both have medium-high sensitivity to housing development. Option K would likely lead to negative effects through extending development northwest of the M48 into the open landscape, which currently acts as a physical barrier to development. Option J would extend the settlement of Caldicot to the northeast, towards the settlement of Crick and extend development north of the Caldicot Castle Country Park (which is also a conservation area). Option L performs more strongly than Options J and K as it is considered to have medium sensitivity to residential development. However, development of Option L could lead to coalescence between Caldicot and Rogiet, which may result in the loss of a multi-functional open space and designated 'Green Wedge'. Option M may also set precedent for further development in the open landscape to the east along the A48, however is of medium-low sensitivity to development, and therefore is best performing of the options.

[72] White Consultants (2009) Monmouthshire Landscape Sensitivity and Capacity Study

It is noted that for all Options, mitigation (which reduces the extent of development to avoid the most sensitive areas) is considered likely to reduce the significance of the potential negative effects. However, this is uncertain at this stage and will be dependent on the design/ layout and implementation of specific mitigation measures.

Climate change (including flood risk)

Options	Option J – Land north east of Caldicot	Option K – Land north west of Caldicot	Option L – Land west of Caldicot	Option M – Land east of Caerwent
Rank	**1**	**1**	**3**	**2**
Significant effect?	**Uncertain**	**Uncertain**	**Uncertain**	**Uncertain**

Monmouthshire's rurality, limited public transport, high levels of car ownership and the subsequent reliance on the private car, combined with high energy consumption can all contribute to carbon emissions. Monmouthshire County Council declared a climate emergency in May 2019, and as such growth Options will be required to contribute positively towards meeting the Council's aim of reducing its net carbon emissions to zero by 2030.

In relation to climate change adaptation, key issues include the need to capitalise upon opportunities to design-in low carbon infrastructure to development from the outset, and therefore minimise additional CO_2 emissions associated with development. There are no significant differences between the Options in terms of opportunities to design-in low carbon infrastructure, i.e., given there is no difference in quantum of housing growth between Options.

All Options also present an opportunity to support adaptation to the potential effects of climate change through providing improvements to the local green infrastructure network. As above, it is considered that all options are able to deliver a similar level of infrastructure. However, it is noted that Option L is an area of open green space, defined as a 'green-wedge'. The loss of this area of green infrastructure has the potential to lead to negative effects in terms of climate change adaptation.

It is considered that there is the potential to reduce greenhouse gas emissions by reducing the need to travel and encouraging the use of sustainable transport modes. Notably, the Active Travel (Wales) Act (2013) requires all local authorities in Wales to deliver improvements to their network of active travel routes and facilities. All Options perform well in this respect, directing growth towards the South of the County; capitalising upon strategic transport links and opportunities associated with the Cardiff Capital Region City Deal and the South East Wales Metro. Option L is best performing given its location along the M4 corridor, nestled between Caldicot and Rogiet with good access to the town centre, and its ability to capitalise upon sustainable transport infrastructure and encourage modal shift. Options J and K perform

relatively on a par in this respect, with Option M performing least positively. This is given that in comparison to other Options, Option M is detached from sustainable travel opportunities in the key Severnside settlements (namely Caldicot) and the wider M4 corridor. It is however noted that the utilisation of the M4 itself will result in continued high car use in the County.

In terms of managing flood risk to address climate change, it is recognised that the Severn Estuary is located along the south of the County. While the majority of Options are not constrained in this respect, the southern extent of Option L is located within Flood Zones B and C. It is however noted that development of Option L could avoid the highest flood risk areas and deliver suitable mitigation (including sustainable drainage systems) to ensure that development does not increase flood risk elsewhere.

Overall, development proposed at the individual Growth Option scale is not likely to have a significant positive or negative effect on climate change when considered in isolation. It is anticipated that this will be addressed through the RLDP policy framework. All Options seek to support the uptake of sustainable travel where possible, capitalising upon strategic transport links to the south of the County; however, it is noted that the utilisation of the M4 corridor will result in continued high car use. As such, effects on climate change in this respect are uncertain. While Option L is best performing in terms of access to sustainable travel, Option L performs poorly due to high risk of flooding, with the potential for long term negative effects. However, it is considered that areas at high risk of flooding would be avoided where possible in line with higher tier planning policy and guidance via the PPW and Technical Advice Note 15. Option M also performs less well than other Options given its detachment from sustainable transport opportunities surrounding Caldicot and Rogiet, and subsequent likely reliance on the private vehicle for travel.

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APPENDIX 4

Integrated Sustainability Appraisal (ISA) for the Monmouthshire Replacement Local Development Plan

Technical Annex Candidate Sites Assessment

Monmouthshire County Council

September 2024

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Quality information

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1. GIS analysis of Candidate Sites

Methodology and assumptions

1.1 In line with the Development Plans Manual Edition 3 (March 2020), separate more spatially specific and quantitative criteria have been developed to assess candidate sites through the ISA, which build on the ISA Framework developed at the scoping stage. The methodology for the ISA of candidate sites involves employing GIS data-sets and measuring ('quantitative analysis') how each candidate site relates to various constraint and opportunity features. Specifically, the aim is to differentiate the performance of the candidate sites in respect of specific locational (e.g., distance to a GP surgery) / intersect (e.g., intersect with flood risk zone) criteria. The ISA methodology allows for the consistent and transparent assessment of candidate sites.

1.2 Two GIS tools were used to undertake the appraisal of candidate site options depending on the feature and measurements required. These provided either a:

- **Straight line distance** from a feature to a candidate site and percentage overlap of any features within a site. Measurements were taken from the closest boundary of the candidate site and the feature; or
- **Network analyst** - Distances calculated from a candidate site to a feature along a real-world network of roads and urban footpaths using Open Street Map. The network analyst tool helps to provide approximate real world walking distances. Network analysis has been carried out assuming suitable access points to the sites (as we cannot use the whole site boundary) and so the walking distances are approximate, i.e., a feature may be closer to the site boundary than the assigned access point.

Assumptions and limitations

1.3 All relevant and available spatial data sets have been used; however, there are data limitations, which is a limitation of the appraisal overall. For example, on the basis of the available datasets, it is noted that much of the data (including Green Wedges, protected employment sites, and industrial and business sites) is from the adopted LDP. This data is being updated as part of the RLDP process.

1.4 Also, it is generally the case that, on the basis of the available datasets, there is more limited potential to appraise the merits of site options in terms of socio-economic objectives, relative to environmental objectives. In this respect, under the economy and employment ISA topic, singular employment sites are not considered (i.e., public house or scrap metal works); rather, clusters of employment sites are considered, including town/ local centres and industrial estates.

1.5 It is also important to state that the appraisal is limited on the basis that proximity / percentage intersect is often (i.e. for many objectives) a crude indicator of constraint or opportunity. For example, whilst percentage intersect with a flood risk zone is a strong indicator of actual flood risk constraint, proximity to a designated biodiversity feature, or Air Quality Management Area

(AQMA), is less robust as an indicator of biodiversity or air quality constraint. We understand that distance to features in this respect does not indicate a 'significant effect', but aids differentiation, which is the aim at this stage of the ISA process. However, it is important to note that these issues will be explored in further detail through the ISA of strategic options and RLDP policies.

1.6 Further criteria specific assumptions are set out below:

- Where candidate sites are brownfield in nature, we assume that any development would be an improvement on the existing form in accordance with principles of sustainable development and placemaking as set out in Planning Policy Wales (PPW).
- It is assumed that all development will deliver appropriate mitigation to address any potential water quality impacts, in accordance with the Water Supply (Water Quality) Regulations 2018 (in Wales). However, it is recognised that water quality issues in relation to Phosphates are affecting the River Wye and River Usk, with developments required to demonstrate betterment or neutrality.
- In terms of infrastructure (green, blue, grey), services and facilities, the appraisal considers only those assets that are existing and does not consider any future proposals.
- It is noted that many existing services and facilities (i.e., industrial and business sites, protected employment sites, etc.) are based on adopted LDP allocations and will be reviewed as part of the RLDP process.

Detailed methodology

1.7 The candidate site options appraisal methodology is presented in Table 1.1 and Table 1.2. The tables set out the criteria and thresholds as well as the GIS tool used and provides further commentary as necessary. The tables recognise data limitations and assumptions set out above. Where possible the ISA methodology has sought to remain consistent with MCC's candidate site methodology[1] and to reflect guidance in the Welsh Government Development Plans Manual Edition 3[2].

[1] Monmouthshire County Council (2022): 'Monmouthshire Replacement Local Development Plan Candidate Sites Assessment Methodology Updated August 2022' can be accessed via https://www.monmouthshire.gov.uk/app/uploads/2022/12/CS-Methodology-Update-August-2022-1.pdf

[2] Welsh Government (2020): 'Development Plans Manual Edition 3' can be accessed via Welsh Government Development Plans Manual Edition 3 (March 2020)

Table 1.1: Site options appraisal methodology

Criteria	Data and measurement	Commentary
Employment		
Identified Industrial & Business Site	Data provided by MCC and does not include features outside the authority. Network analyst measurement.	Highlights walking distance to identified industrial & business site. There is no clear guidance on distance thresholds, and it is recognised that identified industrial & business sites will often be reached by car or public transport. The thresholds therefore reflect the spread of the data.
Protected Employment Site	Data provided by MCC and does not include features outside the authority. Network analyst measurement.	Highlights walking distance to protected employment site. There is no clear guidance on distance thresholds, and it is recognised that protected employment sites will often be reached by car or public transport. The thresholds therefore reflect the spread of the data.
Population and communities		
Neighbourhood centre	Data provided by MCC and does not include features outside the authority. Network analyst measurement.	Highlights walking distance to neighbourhood centres. There is no clear guidance on distance thresholds, and therefore the thresholds reflect the spread of the data.
Central shopping area	Data provided by MCC and does not include features outside the authority. Network analyst measurement.	Highlights walking distance to a central shopping area. There is no clear guidance on distance thresholds, and it is recognised that these facilities will often be reached by car or public transport. The thresholds therefore reflect the spread of the data.
Area of amenity importance	Data provided by MCC and does not include features outside the authority. Network analyst measurement.	Highlights walking distance to an area of amenity importance. There is no clear guidance on distance thresholds, and therefore the thresholds therefore reflect the spread of the data.
School	Data provided by MCC and does not include features outside the authority. Network analyst measurement.	Highlights walking distance to schools. Thresholds based on the WG's Active Travel Guidance (800m for walkable neighbourhoods).
Health and wellbeing		
Health services	Data provided by MCC and does not include features outside the authority. Network analyst measurement.	Highlights walking distance to health facilities (including hospitals, GPs and dentists). Thresholds based on the WG's Active Travel Guidance (800m for walkable neighbourhoods).
Green space	Data provided by MCC and does not include features outside the authority. Network analyst measurement.	Highlights the walking distance of site options to areas of green space. It is recognised that there may be other areas of open or green space that are not considered through this criterion. Thresholds based on the WG's Active Travel Guidance (800m for walkable neighbourhoods).

Criteria	Data and measurement	Commentary
Green wedge	Data provided by MCC and is based on the adopted LDP. Straight line distance/ overlap measurement.	Green wedges are an urban containment mechanism intended to restrict the spread of built development beyond designated settlement boundaries and allocated sites. MCC has indicated several areas to be green wedges in order to prevent coalescence between settlements. Green wedges have been identified through the adopted LDP in the south of Monmouthshire.
Public right of way	Data provided by Welsh Government. Straight line distance/ overlap measurement.	Highlights the proximity of site options to walking routes.
National cycle network	Data provided by Welsh Government. Straight line distance/ overlap measurement.	Highlights the proximity of site options to cycling routes.
National trail	Data provided by MCC. Straight line distance/ overlap measurement.	Highlights the proximity of site options to national trail routes.
Equalities, diversity and inclusion		
Deprivation	Data provided by Welsh Government and included features outside the authority. Straight line distance/ overlap measurement.	Highlights site options that fall within an area of deprivation. Development in an area of relative deprivation (as measured by the Index of Multiple Deprivation) may support regeneration. However, it is recognised that this will be dependent on a variety of factors, including the level of improvements delivered in terms of community facilities.
Transport and movement		
Public transport	Data provided by MCC and includes features outside the authority. Network analyst measurement.	Highlights walking distance to a train station or bus stop. Thresholds based on the WG's Active Travel Guidance (800m for walkable neighbourhoods).
Natural resources		
Air Quality Management Areas (AQMAs)	Data provided by MCC.	Highlights the proximity of site options to an Air Quality Management Area (AQMA).
Land classification	Data provided by Welsh Government. Straight line distance/ overlap measurement.	Highlights whether the site is a previously developed or greenfield site as defined by Future Wales.

Criteria	Data and measurement	Commentary
Agricultural land classification	Data provided by Natural Resource Wales. Straight line distance/ overlap measurement.	The ALC Predictive Map Version 2 (2019) is available and has informed MCC's CS assessments. The Map provides a distinction between Grade 3a (i.e. land classified as the 'best and most versatile') and Grade 3b land (i.e. land which is not classified as such). Taking the above into account it is appropriate to 'flag' red those sites that may include Grade 1 to 3a agricultural land.
Source Protection Zone	Data provided by Natural Resource Wales. Straight line distance/ overlap measurement.	Groundwater Source Protection Zones are designated zones around public water supply abstractions and other sensitive receptors that signal there are particular risks to the groundwater source they protect. The zones are based on an estimation of the time it would take for a pollutant which enters the saturated zone of an aquifer to reach the source abstraction or discharge point. For each source, three zones are defined around a particular water abstraction based on travel times, of the groundwater (Zone 1 = 50 days; Zone 2 = 400 days) and the total catchment area of the abstraction (Zone 3).
Nitrate Vulnerable Zone	Data provided by Natural Resource Wales. Straight line distance/ overlap measurement.	Nitrate Vulnerable Zones are areas within Wales that contain surface water or groundwater that is susceptible to nitrate pollution from agricultural activities. They are designated in accordance with the requirements of the European Commission's Nitrates Directive 91/676/EEC, which aims to protect water quality across Europe by preventing nitrates from agricultural sources polluting ground and surface waters and by promoting the use of good farming practices. The Welsh Government is responsible for maintaining and improving the quality of the aquatic environment and carries out a review of the NVZ areas every four years.
Mineral safeguarded site	Data provided by MCC. Straight line distance/ overlap measurement.	It is assumed that any development outside of a mineral safeguarded site would not result in the sterilisation of that resource and the RAG distances reflect this. Mineral safeguarding areas in Monmouthshire identified through the adopted LDP include limestone and sand gravel. It is noted that these are being reviewed as part of the RLDP process, and will be presented within the Deposit RLDP.
Waterbodies	Data provided by MCC. Straight line distance/ overlap measurement.	It is recognised that distance in itself is not a definitive guide to the likelihood or significance of effects on a waterbody (rivers, lakes and coastline). This criterion will help to highlight the waterbodies that lies in closest proximity to the site for the purposes of differentiating between sites.
Biodiversity		
Ancient Woodland	Data provided by MCC and includes sites lying outside of the authority. Straight line distance/ overlap measurement.	Ancient Woodlands are spread across Monmouthshire. The RAG distances have been selected to take account of this and help differentiate between the sites options.

Criteria	Data and measurement	Commentary
European site (SAC, SPA or Ramsar site)	Data provided by NRW and includes sites lying outside of the authority boundary. Straight line distance/ overlap measurement.	It is recognised that distance in itself is not a definitive guide to the likelihood or significance of effects on a European site. This criterion will help to highlight the European sites that lies in closest proximity to the site for the purposes of differentiating between sites.
National Nature Reserve (NNR)	Data provided by NRW and includes sites lying outside of the authority. Straight line distance/ overlap measurement.	There are two National Nature Reserves (NNR) within Monmouthshire. NNR's are assumed to be of less significance and therefore less sensitive than European sites and SSSIs. However, it is recognised that the designations overlap.
Priority habitats	Data provided by NRW and includes sites lying outside of Monmouthshire. Straight line distance/ overlap measurement.	This seeks to flag if a development at a site could result in the loss of and therefore fragmentation of BAP priority habitats. It also helps to flag if there is the potential for disturbance to priority habitats within 50m of the site.
Sites of Importance for Nature Conservation (SINCs)	Data provided by MCC and does not include sites lying outside of the authority. Straight line distance/ overlap measurement.	There are numerous SINCs situated within Monmouthshire and the RAG distances reflect this along with the assumption that these are of less significance and therefore less sensitive than internationally and nationally designated biodiversity.
Site of Special Scientific Interest (SSSI)	Data provided by NRW and includes sites lying outside of the authority boundary. Straight line distance/ overlap measurement.	As above, it is recognised that distance in itself is not a definitive guide to the likelihood or significance of effects on a European site. This criterion will help to highlight the SSSI that lies in closest proximity to the site and together with the criterion below for SSSI Impact Zones, it will help to differentiate between sites.
Historic Environment		
Conservation Area	Data provided by MCC and does not include conservation areas outside the authority. Straight line distance/ overlap measurement.	It is appropriate to 'flag' a red where a site is within, intersects or is adjacent to a Conservation Area. It is also appropriate to flag sites that might more widely impact on the setting of a Conservation Area and a 50m threshold has been assumed. It is recognised that distance in itself is not a definitive guide to the likelihood or significance of effects on a heritage asset. It is also recognised that the historic environment encompasses more than just designated heritage assets. Whilst there is good potential to highlight where development in proximity to a heritage asset might impact negatively on that asset, or its setting, a limitation relates to the fact that it has not been possible to gather views from heritage specialists on sensitivity of assets/ capacity to develop each of the sites. This is a notable limitation as potential for development to conflict with the setting of historic assets/ local historic character can only really be considered on a case-by-case basis rather than through a distance-based criteria. It will also sometimes be the case that development can enhance heritage assets.

Criteria	Data and measurement	Commentary
Scheduled Monument	Data provided by Cadw and includes assets lying outside of the authority. Straight line distance/ overlap measurement.	As above.
Listed Building	Data provided by Cadw and includes assets lying outside of the authority. Straight line distance/ overlap measurement.	As above.
World heritage site	Data provided by Cadw and includes assets lying outside of the authority. Straight line distance/ overlap measurement.	As above.
Archaeologically sensitive area	Data provided by MCC and does not include sites lying outside of the authority. Straight line distance/ overlap measurement.	As above
Landscape		
Area of Outstanding Natural Beauty (AONB)	Data provided by MCC. Straight line distance/ overlap measurement.	There is only one AONB in Monmouthshire, which is Wye Valley AONB in the east of the county. Highlights the proximity of site options to the Wye Valley AONB.
Country Park	Data provided by MCC. Straight line distance/ overlap measurement.	There are only two country parks in Monmouthshire. Highlights the proximity of site options to the nearest of the two country parks.
National Landscape Character Area	Data provided by MCC. Straight line distance/ overlap measurement.	Monmouthshire intersects five National Landscape Character Areas. Highlights which National Landscape Character Area the site falls within.
National Park	Data provided by MCC. Straight line distance/ overlap measurement.	There is only one National Park in Monmouthshire, which is the Brecon Beacons in the northwest of the county. Highlights the proximity of site options to the Brecon Beacons National Park.
Climate Change		

Criteria	Data and measurement	Commentary
Groundwater flood risk	Data provided by MCC. Straight line distance/ overlap measurement.	This criterion will help to identify sites that fall within areas at risk of groundwater flooding.
Surface water flood risk	Data provided by Welsh Government. Straight line distance/ overlap measurement.	This criterion will help to identify sites that fall within areas at risk of surface water flooding. N.B. While it is important to avoid development in areas of high flood risk, there is the potential to address risk of surface water flooding at the development management stage through the use of appropriate mitigation, such as Sustainable Drainage Systems (SuDS).
Fluvial flood risk	Data provided by Welsh Government. Straight line distance/ overlap measurement.	This criterion will help to identify sites that fall within high flood risk areas. N.B. While it is important to avoid development in flood zones, there is the potential to address flood risk at the development management stage, when a 'sequential approach' can be taken to ensure that uses are compatible with flood risk. There is also the potential to design-in SuDS.

1.8 Table 1.2 overleaf presents the candidate site framework and assessment questions, where '++' represents major positive effects, '+' represents minor positive effects, '0' represents neutral/ no effects, '?' represents uncertain effects, '-' represents minor negatives effects, and '--' represents major negative effects.

Table 1.2: Candidate site framework and assessment questions

ISA themes	ISA objectives		ISA candidate site assessment questions
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	++	New employment land proposed at the site.
		+	The site has good access to existing employment (≤800m from an employment centre).
		0	The site has reasonable access to existing employment (800-1,600m from an employment centre).
		?	Type of development uncertain at this stage.
		-	The site has poor access to existing employment (>1,600m from an employment centre).
		--	Development at the site would result in the loss of existing employment land.
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	++	The site has capacity to deliver a significant number of new homes (≥ 100 dwellings) and it does not intersect with a designated green wedge.
		+	The site has capacity to deliver new homes (<100 dwellings) and it does not intersect with a designated green wedge.
		0	The site will deliver new employment land.
		?	N/A
		-	The site could deliver new homes or employment land; however, the site partially intersects with a designated green wedge.
		--	The site could deliver new homes or employment land; however, the site wholly intersects with a designated green wedge.

ISA themes	ISA objectives		ISA candidate site assessment questions
	To enhance design quality to create places for people that maintain and enhance community and settlement identity.	++	The site is within reasonable walking distance (≤800m) to a primary and a secondary school (≤1,600m).
		+	The site is within reasonable walking distance (≤800m) to a primary or a secondary school (≤1,600m).
		0	N/A
		?	N/A
		-	The site is not within reasonable walking distance (≤800m) to a primary or a secondary school (≤1,600m).
		--	The site is >1,600m from a primary school and secondary school.
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	++	The site is within 800m of a health service and an active travel route.
		+	The site is within 800m of a health service or an active travel route.
		0	N/A
		?	N/A
		-	The site is not within 800m of a health service or an active travel route.
		--	The site is not within 800m of a health service, or an active travel route and development would result in the loss of designated open/ recreational space.
		++	The site is within 800m of a formal leisure and green space.
		+	The site is within 800m of a formal leisure or green space.
		0	N/A
		?	N/A
		-	The site is not within 800m of a formal leisure or green space.

ISA themes	ISA objectives		ISA candidate site assessment questions
		--	The site is not within 800m of a formal leisure and green space or intersects with a formal leisure or green space and may result in their loss.
Equalities, Diversity and Inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	++	The site falls within one of the 10% or 20% most deprived LSOAs in Wales and development proposes the delivery of a new or improved community facility/building/ space that meets a demonstrated need in the area, particularly where it supports the Welsh Language and various groups within the community.
		+	The site falls within one of the 10% or 20% most deprived LSOAs in Wales.
		0	The site falls within one of the 20-30% most deprived LSOAs in Wales.
		?	The site falls within one of the 30-50% most deprived LSOAs in Wales.
		-	The site falls within one of the 50% least deprived LSOAs in Wales.
		--	Development at the site would result in the unjustified loss of a community facility/ building/ space.
Transport and Movement	Increase sustainable transport use and reduce the need to travel.	++	The site is within close proximity (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, and an active travel route.
		+	The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.
		0	N/A
		?	N/A
		-	The site is not within reasonable walking distance (>800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or active travel route.
		--	The site is not within reasonable walking distance (>800m) to a railway station or bus stop, neighbourhood centre or central shopping area, and active travel route.
		++	N/A
		+	The site does not intersect with an AQMA.

ISA themes	ISA objectives		ISA candidate site assessment questions
Natural Resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	0	N/A
		?	N/A
		-	The site intersects with an AQMA.
		--	N/A
	To conserve, protect and enhance the water environment, water quality and water resources.	++	N/A
		+	N/A
		0	The site does not contain and is not in close proximity to a waterbody, nor does it fall within the River Wye Catchment Area.
		?	N/A
		-	The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.
		--	N/A
		++	N/A
		+	The site does not intersect with a Groundwater Source Protection Zone (SPZ).
		0	N/A
		?	N/A
		-	The site intersects with a Groundwater Source Protection Zone (SPZ).
		--	N/A

ISA themes	ISA objectives	ISA candidate site assessment questions	
		++	N/A
		+	The site does not intersect with a Nitrate Vulnerable Zone (NVZ).
		0	N/A
		?	N/A
		-	The site intersects with a Nitrate Vulnerable Zone (NVZ).
		--	N/A
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	++	The site is wholly brownfield land.
		+	The site is predominantly brownfield land (>50%) and contains low quality agricultural land (Grade 3b, 4, urban).
		0	N/A
		?	The site is predominantly greenfield land (≥50%) and contains low quality agricultural land (Grade 3b, 4, urban). *or* The site is predominantly brownfield land (>50%) and contains high quality agricultural land (Grade 1, 2 and 3a).
		-	The site is predominantly greenfield land (>50%) and contains high quality agricultural land (Grade 1, 2 and 3a).
		--	The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).
		++	N/A
		+	The site does not intersect with a mineral safeguarding area.

ISA themes	ISA objectives		ISA candidate site assessment questions
		0	N/A
		?	N/A
		-	The site intersects with a mineral safeguarding area.
		--	The site is wholly within a mineral safeguarding area.
Biodiversity and Geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	++	N/A
		+	The site is brownfield land and there is an opportunity to deliver net gain.
		0	The site does not intersect and is not within 1km of any designated sites.
		?	The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.
		-	The site intersects or is adjacent to a regionally or locally (LNRs and SINCs) designated site and/ or priority habitats/ species.
		--	The site intersects or is adjacent to an internationally (SAC, SPA, Ramsar) or nationally (SSSI, Ancient Woodland, NNRs) designated site.
Historic Environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	++	Regeneration of brownfield land that is currently significantly detracting from the historic environment.
		+	Regeneration of brownfield land that is currently detracting from the historic environment.
		0	Development at this site will have a neutral effect on the historic environment.
		?	Development at the site would have an uncertain effect on the historic environment.
		-	Development at the site has the potential for a negative effect on the historic environment.
		--	Development at the site has the potential for a significant negative effect on the historic environment.

ISA themes	ISA objectives		ISA candidate site assessment questions
		++	The site is predominantly brownfield and does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park.
		+	The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park.
		0	N/A
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	?	The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park; however, the site is either adjacent to/ within close proximity to one of these designated landscapes, and/ or the scale of development proposed (≥ 100 dwellings) on greenfield land has the potential for a negative effect. This is uncertain at this stage.
		-	The site intersects with an Area of Outstanding Natural Beauty, National Park or Country Park.
		--	The site is predominantly greenfield and wholly falls within an Area of Outstanding Natural Beauty, National Park or Country Park.
		++	Development at the site would reduce fluvial flood risk in the area.
		+	The site does not intersect with a high fluvial flood risk area (flood zone 2 and 3).
		0	N/A
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial water sources.	?	N/A
		-	The site intersects with fluvial flood zone 2 or 3.
		--	The site falls wholly within fluvial flood zone 2 or 3.
		++	Development at the site would reduce surface water flood risk in the area.
		+	The site does not intersect with a high surface water flood risk area (flood zone 2 and 3).
		0	N/A
		?	N/A

ISA themes	ISA objectives		ISA candidate site assessment questions
		-	The site intersects with surface water flood zone 2 or 3.
		--	The site falls wholly within surface water flood zone 2 or 3.

2. GIS analysis findings

Abergavenny

Residential

CS0293 - Land east of of Abergavenny

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	+	*The site has good access to existing employment (≤800m from an employment centre).* The site is 1,200-1,300m from the nearest industrial and business site (Ross Road, Abergavenny), but 600-700m from the nearest protected employment site (Lower Monk Street).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	+	*The site has capacity to deliver new homes (<100 dwellings) and it does not intersect with a designated green wedge.*
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	-	*The site is not within reasonable walking distance (≤800m) to a primary or a secondary school (≤1,600m).* The site is 1,500-1,600m from the nearest primary school (Our Lady St Michaels RC Primary) and 2-2.5km from the nearest secondary school (King Henry VIII Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	++	*The site is within 800m of a health service and an active travel route.* The site is not within 100-200m of a health service, is within 73m of the nearest National Cycle Network route, and adjacent to a public right of way.
		+	*The site is within 800m of a formal leisure or green space.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site is 500-600m from a play space.
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* Not classified as deprived or relatively deprived (3rd quintile).
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 100-200m from the nearest bus stop, and within 73m of the nearest National Cycle Network route. It is also within 50-100m of the nearest rail station. It is 2-2.5km from the nearest neighbourhood centre and 800-900m from the nearest central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is adjacent to or intersects with a river.
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	-	*The site is predominantly greenfield land (>50%) and contains high quality agricultural land (Grade 1, 2 and 3a).*
		--	*The site intersects with a mineral safeguarding area.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site intersects with a mineral safeguarding area for sand and gravel.
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	-	*The site intersects or is adjacent to a regionally or locally (LNRs and SINCs) designated site and/ or priority habitats/ species.* The site is 329m from the nearest SINC (River Gavenni), 428m from the nearest SSSI and SA(River Usk (Lower Usk)), and 82m from the nearest area of ancient woodland. However, the site is adjacent to and intersects an area of parkland priority habitat (0.08%).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	?	*Development at the site would have an uncertain effect on the historic environment.* The site is 536m from the nearest scheduled monument (Area of Conventual Buildings, St Mary's Priory), 67m from the nearest grade II listed building, 576m from the nearest grade II* listed building, 349m from the nearest archaeologically sensitive area, 65m from the nearest conservation area (Abergavenny) and 546m from the nearest grade I listed building. Given the proximity of the site to heritage features, uncertain effects are most likely.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	+	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park.*
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (Flood Zone 2 and 3).*
		-	*The site intersects with surface water flood zone 2 or 3.* <50% of the site intersects with flood zone 2 or 3.

Caerwent

Residential

CS0091 – Caerwent Depot

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	-	*The site has poor access to existing employment (>1,600m away from an employment centre).* The site is 1,900-2000m from the nearest protected employment site (Severn Bridge, Caldicot).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	+	*The site has capacity to deliver new homes (<100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 60 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	--	*The site is >1,600m from a primary school and secondary school.* The site is 2-2.5km from the nearest primary school (Castle Park Primary) and 3-4km from the nearest secondary school (Caldicot Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	*The site is within 800m of a health service or an active travel route.* The site is not within 800m of a health service; however, it is adjacent to the nearest National Cycle Network route.
		--	*The site is not within 800m of a formal leisure and green space.* The site is 1,200-1,300m from the nearest area of amenity importance and 1,300-1,400m from the nearest green space (playing field).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site falls within the Caerwent LSOA, which is amongst the 10-20% least deprived LSOAs in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 50-100m from the nearest bus stop (Crick House) and adjacent to the nearest National Cycle Network route. However, it is not within reasonable walking distance to a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	0	*The site does not contain and is not in close proximity to a waterbody, nor does it fall within the River Wye Catchment Area.*
		-	*The site intersects with a Groundwater Source Protection Zone (SPZ).* The site falls within SPZ 3.
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	++	*The site is wholly brownfield land.*
		--	*The site intersects with a mineral safeguarding area.* The site intersects with a mineral safeguarding area for carboniferous limestone, and sand and gravel.

ISA topic	ISA objective	Significant effect?	Commentary
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.* The site is 157m from the nearest SINC (Little Wood), 402m from the nearest SSSI (Nedern Brook Wetlands, Caldicot), and 780m from the nearest priority habitat (lowland meadows).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	-	*Development at the site has the potential for a negative effect on the historic environment.* The site is 99m from the nearest scheduled monument (Crick Round Barrow), 184m from the nearest grade II listed building, 334m from the nearest grade II* listed building, 462m from the nearest archaeologically sensitive area, and 871m from the nearest conservation area (Caerwent). Whilst the site is wholly brownfield, and relatively small in size (2.44ha), development has potential to disturb nearby archaeological remains. Nevertheless, it is recognised that development also has potential to improve the setting of the nearby listed buildings.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	++	*The site is predominantly brownfield and does not intersect with an Area of Outstanding Natural Beauty, National Park, or Country Park.*
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (Flood Zone 2 and 3).*
		+	*The site does not intersect with a high surface water flood risk area (Flood Zone 2 and 3).*

CS0129 – Dewstow Village (Former Dewstow Golf Course)

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	+	*The site has good access to existing employment (≤800m of an employment centre).* The site is 400-500m from the nearest protected employment site (Cheeseman's Industrial Estate, Rogiet).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	++	*The site has capacity to deliver a significant number of new homes (≥ 100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 815 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	++	*The site is within reasonable walking distance (≤800m) to a primary and a secondary school (≤1,600m).* The site is 600-700m from the nearest primary school (Dewstow Primary) and 1,400-1,500m from the nearest secondary school (Caldicot Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	++	*The site is within 800m of a health service and an active travel route.* The site is 700-800m from the nearest dentist (Teeth for Life, 186 Newport Road, Caldicot) and intersects with three PRoWs (353/113/5, 353/115/3 and 353/115/5).
		++	*The site is within 800m of a formal leisure and green space.* The site is 0-50m from the nearest area of amenity importance and 50-100m from the nearest green space (cemetery).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Caerwent LSOA, which is amongst the 10-20% least deprived LSOAs in Wales.

ISA topic	ISA objective	Significant effect?	Commentary
Transport and movement	Increase sustainable transport use and reduce the need to travel.	++	*The site is within close proximity (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, and an active travel route.* The site is 400-500m from the nearest bus stop (Cherry Tree Nursing Home), 700-800m from the nearest neighbourhood centre (West End, Caldicot), and intersects with two PRoWs (353/115/3, 353/115/5 and 353/113/5). The site is also 129m from the nearest National Cycle Network route.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	0	*The site does not contain and is not in close proximity to a waterbody, nor does it fall within the River Wye Catchment Area.*
		-	*The site intersects with a Groundwater Source Protection Zone (SPZ).* The site falls within SPZ 3.
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is a former golf course.
		--	*The site intersects with a mineral safeguarding area.* The northern part of the site intersects with a mineral safeguarding area for carboniferous limestone.
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	-	*The site intersects or is adjacent to a regionally or locally (LNRs and SINCs) designated site and/ or priority habitats/ species.*

ISA topic	ISA objective	Significant effect?	Commentary
			The northern boundary of the site is adjacent to the nearest SINC (Caerwent Quarry), 26m from the nearest area of ancient woodland, 66m from the nearest propriety habitat (open mosaic habitat on previously developed land), and 176m from the nearest SSSI (Brockwells Meadows).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	-	*Development at the site has the potential for a negative effect on the historic environment.* The site is 35m from the nearest grade II* listed building, 46m from the nearest grade II listed building, 49m from the nearest archaeologically sensitive area, 610m from the nearest conservation area (Caerwent), 624m from the nearest scheduled monument (Church Farm Romano-British settlement), and 943m from the nearest grade I listed building. This is a large site (37.1ha), and therefore it is likely to impact the setting of the four listed buildings located in Dewstow Gardens and Grottoes, which borders the site to the east and south. In addition, development has potential to disturb nearby archaeological remains.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	?	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park; however, the site is either adjacent to/ within close proximity to one of these designated landscapes, and/ or the scale of development proposed (≥ 100 dwellings) on greenfield land has the potential for a negative effect. This is uncertain at this stage.* The site will deliver 815 homes on a former golf course.
		+	*The site does not intersect with a high fluvial flood risk area (Flood Zone 2 and 3).*

ISA topic	ISA objective	Significant effect?	Commentary
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	-	*The site intersects with surface water Flood Zone 2 or 3.* Less than 50% of the site intersects with surface water Flood Zone 2 or 3. However, this is only a very small part of the site, just west of the M48 and north of Dewstow Road.

CS0071 – Land at Slough Farm Caerwent

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	-	*The site has poor access to existing employment (>1,600m away from an employment centre).* The site is 2-2.5km from the nearest protected employment site (Severn Bridge, Caldicot).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	++	*The site has capacity to deliver a significant number of new homes (≥ 100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 143 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	--	*The site is >1,600m from a primary school and secondary school.* The site is 2.5-3km from the nearest primary schools (Archbishop Rowan Williams VA Primary, Ysgol Y Ffin and Castle Park Primary) and 3-4km from the nearest secondary school (Caldicot Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	*The site is within 800m of a health service or an active travel route.* The site is not within 800m of a health service; however, it is 1m from the nearest National Cycle Network route.
		++	*The site is within 800m of a formal leisure and green space.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site is 400-500m from the nearest area of amenity importance and 400-500m from the nearest green space (playing field).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Caerwent LSOA, which is amongst the 10-20% least deprived LSOAs in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 100-200m from the nearest bus stop (Dinham) and 1m from the nearest National Cycle Network route. The site is also 278m from the nearest PRoW. However, it is not within reasonable walking distance to a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 133m from the nearest waterbody (river).
		-	*The site intersects with a Groundwater Source Protection Zone (SPZ).* The site falls within SPZ 3.
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).*

ISA topic	ISA objective	Significant effect?	Commentary
	development and protecting, where possible, higher grade agricultural land.		The site is currently used for agriculture.
		--	*The site is within a mineral safeguarding area.* The site is within a mineral safeguarding area for sand and gravel.
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.* The site is 68m from the nearest SSSI (Nedern Brook Wetlands, Caldicot), 208m from the nearest priority habitat (traditional orchard), 400m from the nearest area of ancient woodland, and 404m from the nearest SINC (Little Wood).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	-	*Development at the site has the potential for a negative effect on the historic environment.* The site is 86m from the nearest archaeologically sensitive area, 121m from the nearest conservation area (Caerwent), 122m from the nearest scheduled monument (Crick Round Barrow), 563m from the nearest grade II listed building, and 719m from the nearest grade II* listed building. Whilst the site is relatively small (7.5ha), development has the potential to disturb nearby archaeological remains located to the west of the site. In addition, the site has the potential to impact the setting of the conservation area, also located to the west of the site, as well as the setting of the scheduled monument, located to the east of the site.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	?	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park; however, the site is either adjacent to/ within close proximity to one of these designated landscapes, and/ or the scale of development proposed (≥ 100*

ISA topic	ISA objective	Significant effect?	Commentary
			dwellings) on greenfield land has the potential for a negative effect. This is uncertain at this stage. The site will deliver 143 homes on agricultural land.
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (Flood Zone 2 and 3).*
		+	*The site does not intersect with a high surface water flood risk area (Flood Zone 2 and 3).*

CS0017 – Land at Village Farm

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	-	*The site has poor access to existing employment (>1,600m away from an employment centre).* The site is 5-6km from the nearest protected employment site (Cheeseman's Industrial Estate, Rogiet).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	+	*The site has capacity to deliver new homes (<100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver six new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	--	*The site is >1,600m from a primary school and secondary school.* The site is 4-5km from the nearest primary school (Shirenewton Primary) and 7-8km from the nearest secondary school (Caldicot Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	*The site is within 800m of a health service or an active travel route.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site not within 800m of a health service; however, it is 91m from the nearest PRoW.
		+	*The site is within 800m of a formal leisure or green space.* The site is not within 800m of a formal leisure space; however, it is 0-50m from the nearest green space (religious grounds).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Caerwent LSOA, which is amongst the 10-20% least deprived LSOAs in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 400-500m from the nearest bus stop (Llanvair Discoed) and 91m from the nearest PRoW. However, it is not within reasonable walking distance to a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 30m from the nearest waterbody (river).
		-	*The site intersects with a Groundwater Source Protection Zone (SPZ).* The site falls within SPZ 3.

ISA topic	ISA objective	Significant effect?	Commentary
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.
		--	*The site is within a mineral safeguarding area.* The site intersects with a mineral safeguarding area for carboniferous limestone.
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.* The site is 123m from the nearest priority habitat (lowland dry acid grassland), 192m from the nearest area of ancient woodland, and 221m from the nearest SINC (Wern Brake).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	-	*Development at the site has the potential for a negative effect on the historic environment.* The site is 36m from the nearest scheduled monument (Llanvair Castle) and 61m from the nearest grade II listed building. Whilst the site is very small (0.7ha), it still has the potential to impact the setting of the aforementioned heritage assets, which are located to the south of the site. However, it is recognised that there are existing homes and a road between the site and these heritage assets, which will likely provide a degree of screening.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	+	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park.*

ISA topic	ISA objective	Significant effect?	Commentary
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (Flood Zone 2 and 3).*
		+	*The site does not intersect with a high surface water flood risk area (Flood Zone 2 and 3).*

Mixed Use: Residential (C3), Care (C2), Employment (B1), Community Use (D1)

CS0009 – Land at former MoD Training Centre

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	++	*New employment land proposed at the site.* The site is proposed for mixed-use development, including employment use.
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	+	*The site has capacity to deliver new homes (<100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 80 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	--	*The site is >1,600m from a primary school and secondary school.* The site is 2.5-3km from the nearest primary school (Ysgol Y Ffin) and 3-4km from the nearest secondary school (Caldicot Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	*The site is within 800m of a health service or an active travel route.* The site is not within 800m of a health service; however, it is 28m from the nearest National Cycle Network route.
		++	*The site is within 800m of a formal leisure and green space.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site is 300-400m from the nearest area of amenity importance and 300-400m from the nearest green space (play space).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Caerwent LSOA, which is amongst the 10-20% least deprived LSOAs in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 0-50m from the nearest bus stop (Dinham) and 28m from the nearest National Cycle Network route. The site is also 316m from the nearest PRoW. However, it is not within reasonable walking distance to a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	0	*The site does not contain and is not in close proximity to a waterbody, nor does it fall within the River Wye Catchment Area.*
		-	*The site intersects with a Groundwater Source Protection Zone (SPZ).* The site falls within SPZ 3.
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	-	*The site is predominantly greenfield land (>50%) and contains high quality agricultural land (Grade 1, 2 and 3a).* The site comprises the former MoD Training Centre, however this is predominantly greenfield land.

ISA topic	ISA objective	Significant effect?	Commentary
		--	*The site is within a mineral safeguarding area.* The site intersects with a mineral safeguarding area for carboniferous limestone and sand and gravel.
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.* The site is 141m from the nearest priority habitat (traditional orchard), 269m from the nearest SSSI (Nedern Brook Wetlands, Caldicot), 359m from the nearest area of ancient woodland, and 364m from the nearest SINC (Little Wood).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	-	*Development at the site has the potential for a negative effect on the historic environment.* The site is 125m from the nearest archaeologically sensitive area, 138m from the nearest conservation area (Caerwent), 327m from the nearest scheduled monument (Crick Round Barrow), 593m from the nearest grade II listed building, and 900m from the nearest grade II* listed building. Whilst the site is partially brownfield, and relatively small (4.2ha), development has the potential to disturb nearby archaeological remains located to the west of the site. In addition, the site could impact the setting of the conservation area, also located to the west of the site.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	+	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park.*
		+	*The site does not intersect with a high fluvial flood risk area (Flood Zone 2 and 3).*

ISA topic	ISA objective	Significant effect?	Commentary
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	-	*The site intersects with surface water Flood Zone 2 or 3.* Less than 50% of the site intersects with surface water Flood Zone 2 or 3.

Caldicot Castle

Residential

CS0067 – Land east and west of Church Road

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	0	*The site has reasonable access to existing employment (800-1,600m from an employment centre).* The site is 1,500-1,600m from the nearest protected employment site (Severn Bridge, Caldicot).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	+	*The site has capacity to deliver new homes (<100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 23 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	+	*The site is within reasonable walking distance (≤800m) to a primary or a secondary school (≤1,600m).* The site is 700-800m from the nearest primary school (Ysgol Y Ffin); however, it is 1,700-1,800m from the nearest secondary school (Caldicot Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	*The site is within 800m of a health service or an active travel route.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site is not within 800m of a health service; however, it intersects with a PRoW (354/39/2).
		++	*The site is within 800m of a formal leisure and green space.* The site is 0-50m from an area of amenity importance and 200-300m from a green space (religious grounds and play space).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Caldicot Castle 1 LSOA, which is amongst the 10-20% least deprived LSOAs in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 300-400m from the nearest bus stop (Heol Glaslyn) and intersects with a PRoW (354/39/2). It is also 146m from the nearest National Cycle Network route. However, the site is not within reasonable walking distance to a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 122m from the nearest waterbody (river).
		-	*The site intersects with a Groundwater Source Protection Zone (SPZ).* The site falls within SPZ 3.

ISA topic	ISA objective	Significant effect?	Commentary
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	?	*The site is predominantly greenfield land (≥50%) and contains low quality agricultural land (Grade 3b, 4, urban).* The current use of the site is agriculture/ DES2.
		--	*The site is within a mineral safeguarding area.* The site intersects with a mineral safeguarding area for carboniferous limestone, and sand and gravel.
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	--	*The site intersects or is adjacent to an internationally (SAC, SPA, Ramsar) or nationally (SSSI, Ancient Woodland, NNRs) designated site.* The northeastern end of the site is adjacent to an area of ancient woodland. In addition, the site is 46m from the nearest SSSI (Nedern Brook Wetlands, Caldicot), 242m from the nearest SINC (Caerwent Quarry), and 629m from the nearest priority habitat (traditional orchard).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	--	*Development at the site has the potential for a significant negative effect on the historic environment.* The northeastern half of the site (55% of the entire site), on the eastern side of Church Road, fully intersects with an archaeologically sensitive area. In addition, the site is 181m from the nearest scheduled monument (Church Farm Romano-British settlement), 500m from the nearest grade II listed building, 579m from the nearest grade II* listed building, 717m from the nearest conservation area (Caldicot), and 784m from the nearest grade I listed building. Whilst the site is small (2.6ha), development has the potential to disturb on-site archaeological remains.

ISA topic	ISA objective	Significant effect?	Commentary
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	?	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park; however, the site is either adjacent to/ within close proximity to one of these designated landscapes, and/ or the scale of development proposed (≥ 100 dwellings) on greenfield land has the potential for a negative effect. This is uncertain at this stage.* The site is 814m from the nearest Country Park (Caldicot Castle).
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (Flood Zone 2 and 3).*
		+	*The site does not intersect with a high surface water flood risk area (Flood Zone 2 and 3).*

Caldicot Castle / Portskewett

Residential

CS0087 – The Showground

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	+	*The site has good access to existing employment (≤800m from an employment centre).* The site is 100-200m from the nearest protected employment site (Severn Bridge, Caldicot) and 700-800m from the nearest identified industrial and business site (Pill Row, Severnbridge Industrial Estate, Caldicot).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	++	*The site has capacity to deliver a significant number of new homes (≥ 100 dwellings) and it does not intersect with a designated green wedge.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site has capacity to deliver 500 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	++	*The site is within reasonable walking distance (≤800m) to a primary and a secondary school (≤1,600m).* The site is 300-400m from the nearest primary school (Castle Park Primary) and 1,100-1,200m from the nearest secondary school (Caldicot Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	++	*The site is within 800m of a health service and an active travel route.* The site is 500-600m from the nearest dentist (The Bridges Dental Surgery, Caldicot) and intersects with four PRoWs (354/48/1, 354/79/1, 376/25/1 and 376/26/1).
		++	*The site is within 800m of a formal leisure and green space.* The site is 0-50m from the nearest area of amenity importance and green space (public park or garden).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Caldicot Castle 1 LSOA, which is amongst the 10-20% least deprived LSOAs in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	++	*The site is within close proximity (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, and an active travel route.* The site is 300-400m from the nearest bus stop (St Mary's Junior School), 400-500m from the nearest central shopping area (Caldicot), and intersects with four PRoWs (354/48/1, 354/79/1, 376/25/1 and 376/26/1).

ISA topic	ISA objective	Significant effect?	Commentary
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The western extent of the site, near the site boundary, intersects with a river (Nedern Brook).
		-	*The site intersects with a Groundwater Source Protection Zone (SPZ).* The site falls within SPZ 3.
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	-	*The site is predominantly greenfield land (>50%) and contains high quality agricultural land (Grade 1, 2 and 3a).*
		--	*The site intersects with a mineral safeguarding area.* The site intersects with a mineral safeguarding area for carboniferous limestone, and sand and gravel.
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	--	*The site intersects or is adjacent to an internationally (SAC, SPA, Ramsar) or nationally (SSSI, Ancient Woodland, NNRs) designated site.* The western extent of the site, near the site border, intersects with an SSSI (Nedern Brook Wetlands, Caldicot). In addition, the site is 54m from the nearest area of ancient woodland, 84m from the nearest SINC (Farthing Hill), and 896m from the nearest priority habitat (lowland calcareous grassland).

ISA topic	ISA objective	Significant effect?	Commentary
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	--	*Development at the site has the potential for a significant negative effect on the historic environment.* The western half of the site intersects with an archaeologically sensitive area, and the southwestern quarter of the site intersects a conservation area (Caldicot). In addition, the site is 35m from the nearest grade II listed building, 39m from the nearest scheduled monument (Caldicot Castle (unoccupied parts)), 94m from the nearest grade I listed building, and 151m from the nearest grade II* listed building. The site is large (38.6ha), and therefore development has the potential to disturb on-site archaeological remains. In addition, the site will likely impact the setting of the conservation area that it intersects with, as well as the setting of the aforementioned listed buildings and scheduled monument.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	?	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park; however, the site is either adjacent to/ within close proximity to one of these designated landscapes, and/ or the scale of development proposed (≥ 100 dwellings) on greenfield land has the potential for a negative effect. This is uncertain at this stage.* The southwestern boundary of the site is adjacent to a Country Park (Caldicot Castle). In addition, the site will deliver 500 new homes on land currently used as an equestrian event centre.
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	-	*The site intersects with fluvial Flood Zone 2 or 3.* Less than 50% of the site intersects with fluvial Flood Zone 2 or 3. This is largely isolated along the western and southern boundaries of the site.
		-	*The site intersects with surface water Flood Zone 2 or 3.*

ISA topic	ISA objective	Significant effect?	Commentary
			Less than 50% of the site intersects with surface water Flood Zone 2 or 3. This is largely isolated along the western and southern boundaries of the site.

Cantref

Residential

CS0128 – Land at Chapel Farm Fields

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	+	*The site has good access to existing employment (≤800m from an employment centre).* The site is 700-800m from the nearest protected employment site (Hatherleigh Place, Abergavenny).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	++	*The site has capacity to deliver a significant number of new homes (≥ 100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 120 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	++	*The site is within reasonable walking distance (≤800m) to a primary and a secondary school (≤1,600m).* The site is 600-700m from the nearest primary school (Cantref Primary) and 1,300-1,400m from the nearest secondary school (King Henry VIII Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	*The site is within 800m of a health service or an active travel route.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site is not within 800m of a health service; however, it is 120m from the nearest PRoW.
		++	*The site is within 800m of a formal leisure and green space.* The site is 200-300m from the nearest area of amenity importance and green space (playfield field).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Cantref 1 LSOA, which is amongst the 10-20% least deprived LSOAs in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 100-200m from the nearest bus stop (Albany Road) and 120m from the nearest PRoW. However, it is not within reasonable walking distance to a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 186m from the nearest waterbody (river).
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*

ISA topic	ISA objective	Significant effect?	Commentary
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The current use of the site is agriculture.
		--	*The site is within a mineral safeguarding area.* The site is within a mineral safeguarding area for sand and gravel.
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	-	*The site intersects or is adjacent to a regionally or locally (LNRs and SINCs) designated site and/ or priority habitats/ species.* The western boundary of the site is adjacent to a SINC (Orchard House). In addition, the site is 169m from the nearest priority habitat (parkland), 226m from the nearest area of ancient woodland, and 726m from the nearest SAC and SSSI (River Usk/ Afon Wysg),
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	--	*Development at the site has the potential for a significant negative effect on the historic environment.* The southeastern corner of the site is adjacent to a conservation area (Abergavenny). In addition, the site is 232m from the nearest grade II listed building, 900m from the nearest grade II* listed building, and 930m from the nearest archaeologically sensitive area. The site is relatively large (9.6ha) and is therefore likely to impact the setting of the adjacent conservation area.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	?	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park; however, the site is either adjacent to/ within close proximity to one of these designated landscapes, and/ or the scale of development proposed (≥ 100 dwellings) on greenfield land has the potential for a negative effect. This is uncertain at this stage.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site is 4m from the nearest National Park (Breacon Beacons). In addition, it will deliver 120 homes on agricultural land.
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	-	*The site intersects with Flood Zone 2 or 3.* Less than 50% of the site intersects with Flood Zone 2 or 3 (fluvial). This is isolated to the southern extent of the site near the site boundary.
		+	*The site does not intersect with a high surface water flood risk area (Flood Zone 2 and 3).*

GS0056 – Land south Brecon Road

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	0	*The site has reasonable access to existing employment (800-1,600m from an employment centre).* The site is 800-900m from the nearest protected employment site (Hatherleigh Place, Abergavenny).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	+	*The site has capacity to deliver new homes (<100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 76 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	-	*The site is not within reasonable walking distance (≤800m) to a primary or a secondary school (≤1,600m).* The site is 1,100-1,200m from the nearest primary school (Cantref Primary) and 2-2.5km from the nearest secondary school (King Henry VIII Comprehensive).

ISA topic	ISA objective	Significant effect?	Commentary
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	*The site is within 800m of a health service or an active travel route.* The site is not within 800m of a health service; however, it is 134m from the nearest PRoW.
		++	*The site is within 800m of a formal leisure and green space.* The site is 100-200m from the nearest area of amenity importance and 500-600m from the nearest green space (playing field and religious grounds).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Cantref 1 LSOA, which is amongst the 10-20% least deprived LSOAs in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 100-200m from the nearest bus stop (Meadow Lane) and 134m from the nearest PRoW. However, it is not within reasonable walking distance to a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 66m from the nearest waterbody (river).
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*

ISA topic	ISA objective	Significant effect?	Commentary
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.
		--	*The site is within a mineral safeguarding area.* The site is within a mineral safeguarding area for sand and gravel.
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.* The site is 15m from the nearest priority habitat (parkland), 180m from the nearest area of ancient woodland, 205m from the nearest SINC (Orchard House), and 357m from the nearest SAC and SSSI (River Usk/ Afon Wysg).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	-	*Development at the site has the potential for a negative effect on the historic environment.* The site is 33m from the nearest grade II listed building, 521m from the nearest conservation area (Abergavenny), 615m from the nearest scheduled monument (Llanwenarth Churchyard Cross-Base), and 618m from the nearest grade II* listed building. Whilst the site is relatively small (3.2ha), it still has the potential to impact the setting of the nearby grade II listed building, which is located to the north of the site. However, it is recognised that the listed building is relatively well screened by trees, and Pentre Road provides some separation between the listed building and the site.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	?	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park; however, the site is either*

ISA topic	ISA objective	Significant effect?	Commentary
			adjacent to/ within close proximity to one of these designated landscapes, and/ or the scale of development proposed (≥ 100 dwellings) on greenfield land has the potential for a negative effect. This is uncertain at this stage. The site is 15m from the nearest National Park (Brecon Beacons).
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (Flood Zone 2 and 3).* Whilst the site does not intersect with a high fluvial flood risk area, it is recognised that the area immediately to the south and east of the site is within fluvial Flood Zone 2 or 3.
		+	*The site does not intersect with a high surface water flood risk area (Flood Zone 2 and 3).*

Croesonen

Residential

CS0220 – Land at Ross Road, Abergavenny

Table AB.12 CS0220 – Land at Ross Road, Abergavenny

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	+	*The site has good access to existing employment (≤800m from an employment centre).* The site is 0-50m from the nearest protected employment site and identified industrial and business site (Ross Road, Abergavenny).

ISA topic	ISA objective	Significant effect?	Commentary
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	++	*The site has capacity to deliver a significant number of new homes (≥ 100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 189 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	++	*The site is within reasonable walking distance (≤800m) to a primary and a secondary school (≤1,600m).* The site is 500-600m from the nearest primary school (Ysgol Gymraeg Y Fenni) and 1,500-1,600m from the nearest secondary school (King Henry VIII Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	++	*The site is within 800m of a health service and an active travel route.* The site is 400-500m from the nearest hospital (Maindiff Court Hospital, Abergavenny) and 1m from the nearest PRoW.
		++	*The site is within 800m of a formal leisure and green space.* The site is 300-400m from the nearest area of amenity importance and green space (playing field).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	?	*The site falls within one of the 30-50% most deprived LSOAs in Wales.* The site falls within the Croesonen LSOA, which is amongst the 30-40% most deprived LSOAs in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	++	*The site is within close proximity (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, and an active travel route.* The site is 0-50m from the nearest bus stop (Abergavenny Junction, Station House), 200-300m from the nearest neighbourhood centre

ISA topic	ISA objective	Significant effect?	Commentary
			(The Mardy, Abergavenny), and 1m from the nearest PRoW. It is also 170m from the nearest National Cycle Network route.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* A river (River Gavenny) intersects with the site.
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The current use of the site is agriculture.
		+	*The site does not intersect with a mineral safeguarding area.*
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	--	*The site intersects or is adjacent to an internationally (SAC, SPA, Ramsar) or nationally (SSSI, Ancient Woodland, NNRs) designated site.* A large part of the site (72%) intersects with a SINC (River Gavenni, Ross Road). In addition, the central part and northwestern extent of the site intersects with an area of ancient woodland. The central part of the site also intersects with an SSSI (Cwm Mill Section, Mardy). The site is 25m from the nearest priority habitat (traditional orchard).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets.	-	*Development at the site has the potential for a negative effect on the historic environment.*

ISA topic	ISA objective	Significant effect?	Commentary
	Promote understanding of Monmouthshire's cultural heritage.		The site is 305m from the nearest grade II listed building, 394m from the nearest archaeologically sensitive area, 447m from the nearest conservation area (Abergavenny), 488m from the nearest grade I listed building, and 976m from the nearest grade II* listed building. The site is relatively large (9.6ha), and therefore it has the potential to impact the setting of the aforementioned heritage assets. However, it is recognised that the site is relatively well screened from these heritage assets. Nevertheless, development also has the potential to disturb nearby archaeological remains.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	?	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park; however, the site is either adjacent to/ within close proximity to one of these designated landscapes, and/ or the scale of development proposed (≥ 100 dwellings) on greenfield land has the potential for a negative effect. This is uncertain at this stage.* The site is 306m from the nearest National Park (Brecon Beacons). In addition, the site will deliver 189 homes on agricultural land.
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	-	*The site intersects with fluvial Flood Zone 2 or 3.* Less than 50% of the site intersects with fluvial Flood Zone 2 or 3. Fluvial flood risk is largely isolated to the part of the site where the River Gavenny flows, near the western boundary of the site.
		-	*The site intersects with surface water Flood Zone 2 or 3.* Less than 50% of the site intersects with surface water Flood Zone 2 or 3. Surface water flood risk is largely isolated to the central part and northern extent of the site.

Crucorney

Residential

CS0219 – Land at Sun Meadow

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	-	*The site has poor access to existing employment (>1,600m from an employment centre).* The nearest protected employment site and identified industrial and business site (Ross Road, Abergavenny) is 6-7km from the site.
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	+	*The site has capacity to deliver new homes (<100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 20 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	+	*The site is within reasonable walking distance (≤800m) to a primary or a secondary school (≤1,600m).* The site is 300-400m from the nearest primary school (Llanvihangel Crucorney Primary); however, it is 7-8km from the nearest secondary school (King Henry VIII Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	*The site is within 800m of a health service or an active travel route.* The site is not within 800m of a health service; however, it is 11m from the nearest PRoW.
		++	*The site is within 800m of a formal leisure and green space.* The site is 477m from the nearest National Trail and 300-400m from the nearest green space (religious grounds).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site falls within the Crucorney LSOA, which is amongst the 30-40% least deprived LSOAs in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 0-50m from the nearest bus stop (Police Station) and 11m from the nearest PRoW. It is also 189m from the nearest National Cycle Network route. However, it is not within reasonable walking distance to a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The northern boundary of the site is adjacent to a river and the site falls within the River Wye Catchment Area.
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.
		+	*The site does not intersect with a mineral safeguarding area.*

ISA topic	ISA objective	Significant effect?	Commentary
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	--	*The site intersects or is adjacent to an internationally (SAC, SPA, Ramsar) or nationally (SSSI, Ancient Woodland, NNRs) designated site.* The site wholly intersects with a SINC (Werngifford). In addition, the southeastern corner of the site is adjacent to an area of ancient woodland. The site is 327m from the nearest priority habitat (traditional orchard) and 808m from the nearest SSSI (Llanfihangel Moraine).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	--	*Development at the site has the potential for a significant negative effect on the historic environment.* The southeastern corner of the site is adjacent to a scheduled monument (Tramway embankment of Grosmont Railway). In addition, the site is 573m from the nearest grade II listed building, 701m from the nearest grade II* listed building, and 773m from the nearest grade I listed building. Whilst the site is small (1ha), development is still likely to disturb the adjacent scheduled monument.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	?	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park; however, the site is either adjacent to/ within close proximity to one of these designated landscapes, and/ or the scale of development proposed (≥ 100 dwellings) on greenfield land has the potential for a negative effect. This is uncertain at this stage.* The site is 15m from the nearest National Park (Brecon Beacons).
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	-	*The site intersects with fluvial Flood Zone 2 or 3.* Less than 50% of the site intersects with fluvial Flood Zone 2 or 3. This is isolated to the northern extent of the site.

ISA topic	ISA objective	Significant effect?	Commentary
		+	*The site does not intersect with a high surface water flood risk area (Flood Zone 2 and 3).*

Devauden

Residential

CS0214 – Land at Churchfields

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	-	*The site has poor access to existing employment (>1,600m from an employment centre).* The site is 8-9km from the nearest protected employment site (Job Centre, Station Road and School Hill, all in Chepstow).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	+	The site has capacity to deliver new homes (<100 dwellings) and it does not intersect with a designated green wedge. The site has capacity to deliver 20 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	--	*The site is >1,600m from a primary school and secondary school.* The site is 5-6km from the nearest primary school (Shirenewton Primary) and 7-8km from the nearest secondary school (Chepstow Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	*The site is within 800m of a health service or an active travel route.* The site is not within 800m of a heath service; however, it is 2m from the nearest PRoW.
		++	*The site is within 800m of a formal leisure and green space.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site is 300-400m from the nearest area of amenity importance and green space (play space and public park or garden).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Devauden LSOA, which is amongst the 20-30% least deprived LSOAs in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 100-200m from the nearest bus stop (St James' Church) and 2m from the nearest PRoW. It is also 258m from the nearest National Cycle Network route. However, it is not within reasonable walking distance to a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	0	*The site does not contain and is not in close proximity to a waterbody, nor does it fall within the River Wye Catchment Area.*
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.
		+	*The site does not intersect with a mineral safeguarding area.*

ISA topic	ISA objective	Significant effect?	Commentary
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.* The site is 110m from the nearest area of ancient woodland, 295m from the nearest SINC (Creigau Meadow), 312m from the nearest priority habitat (lowland dry acid grassland), and 856m from the nearest SSSI (Lower Nex Meadows, Devauden)
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	?	*Development at the site would have an uncertain effect on the historic environment.* The site is 149m from the nearest grade II listed building and 388m from the nearest grade II* listed building. The site is small (1ha) and the grade II listed building, located to the east of the site, is relatively well screened from the site by existing development in Devauden. The grade II* listed building is located to the northwest of the site and is well screened by trees. Nevertheless, a degree of uncertainty is noted as the site still has the potential to impact the setting of these heritage assets.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	--	*The site is predominantly greenfield and wholly falls within an Area of Outstanding Natural Beauty, National Park or Country Park.* The site wholly falls within an Area of Outstanding Natural Beauty (Wye Valley).
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (Flood Zone 2 and 3).*
		+	*The site does not intersect with a high surface water flood risk area (Flood Zone 2 and 3).*

CS0036 – Land west of the B4293 and north of Devauden

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	-	*The site has poor access to existing employment (>1,600m from an employment centre).* The site is 8-9km from the nearest protected employment site (School Hill, Station Road and Job Centre, all in Chepstow).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	+	*The site has capacity to deliver new homes (<100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 36 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	--	*The site is >1,600m from a primary school and secondary school.* The site is 5-6km from the nearest primary school (Shirenewton Primary) and 7-8km from the nearest secondary school (Chepstow Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	*The site is within 800m of a health service or an active travel route.* The site is not within 800m of a health service; however, it intersects with a PRoW (357/65/1).
		++	*The site is within 800m of a formal leisure and green space.* The site is 200-300m from the nearest area of amenity importance and green space (public park or garden).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Devauden LSOA, which is amongst the 20-30% least deprived LSOAs in Wales.

ISA topic	ISA objective	Significant effect?	Commentary
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 0-50m from the nearest bus stop (St James' Church) and intersects with a PRoW (357/65/1). It is also 346m from the nearest National Cycle Network route. However, it is not within reasonable walking distance of a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	0	*The site does not contain and is not in close proximity to a waterbody, nor does it fall within the River Wye Catchment Area.*
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.
		+	*The site does not intersect with a mineral safeguarding area.*
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.* The site is 98m from the nearest SINC (Creigau Meadow), 190m from the nearest priority habitat (lowland dry acid grassland), 237m from the nearest area of ancient woodland, and 987m from the nearest SSSI (Lower Nex Meadows, Devauden).

ISA topic	ISA objective	Significant effect?	Commentary
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	-	*Development at the site has the potential for a negative effect on the historic environment.* The site is 45m from the nearest grade II listed building and 394m from the nearest grade II* listed building. There is one grade II listed building to the north of the site and another to the southeast of the site. However, the building to the north is screened by trees, and the building to the southeast is partially screen by existing development in Devauden, and the B4293 also provides a degree of separation between the site and the building. Nevertheless, given the size of the site (2.8ha), it is likely to have some impact on the setting of both buildings.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	--	*The site is predominantly greenfield and wholly falls within an Area of Outstanding Natural Beauty, National Park or Country Park.* The site wholly falls within an Area of Outstanding Natural Beauty (Wye Valley).
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (Flood Zone 2 and 3).*
		+	*The site does not intersect with a high surface water flood risk area (Flood Zone 2 and 3).*

Tourism

CS0283 – Rockfield Farm

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	-	*The site has poor access to existing employment (>1,600m from an employment centre).* The site is 7-8km from the nearest protected employment site (Woodside Industrial Estate and Former Railway Goods Yard, both in Usk, and Raglan Enterprise Park, Raglan) and identified industrial and business site (South Woodside, Usk).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	?	*N/A* It is currently unknown how many new homes the site will deliver. The site does not intersect with a designated green wedge.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	--	*The site is >1,600m from a primary school and secondary school.* The site is 6-7km from the nearest primary school (Usk Church in Wales Primary) and 10-15km from the nearest secondary school (Chepstow Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	*The site is within 800m of a health service or an active travel route.* The site is not within 800m of a health service; however, it intersects with three PRoWs (365/57/1 365/58/4 and 365/58/5).
		--	*The site is not within 800m of a formal leisure and green space.* The site is 6-7km from the nearest area of amenity importance and 800-900m from the nearest green space (religious grounds).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site falls within the Devauden LSOA, which is amongst the 20-30% least deprived LSOAs in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 50-100m from the nearest bus stop (Wern Panna) and intersects with three PRoWs (365/57/1 365/58/4 and 365/58/5). However, it is not within reasonable walking distance to a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The eastern extent of the site is adjacent to a river.
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.
		+	*The site does not intersect with a mineral safeguarding area.*
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	--	*The site intersects or is adjacent to an internationally (SAC, SPA, Ramsar) or nationally (SSSI, Ancient Woodland, NNRs) designated site.*

ISA topic	ISA objective	Significant effect?	Commentary
			The southeastern extent of the site intersects with an area of ancient woodland. In addition, the southwestern extent of the site intersects with a SINC (Rockfield Farm, Rockfield Wet Meadows). The site is also 15m from the nearest priority habitat (traditional orchard) and 519m from the nearest SSSI (Cwrt y Bela a Springdale)
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	--	*Development at the site has the potential for a significant negative effect on the historic environment.* The southeastern extent of the site is adjacent to a scheduled monument (Ringwork northeast of New House). In addition, the site is 90m from the nearest grade II listed building and 843m from the nearest grade I listed building. The site is large (18.7ha), and whilst the number of homes to be delivered on the site is currently unknown, it is likely to disturb the adjacent scheduled monument. In addition, the site is likely to impact the setting of two nearby grade II listed buildings, which are both located to the east of the site.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	?	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park; however, the site is either adjacent to/ within close proximity to one of these designated landscapes, and/ or the scale of development proposed (≥ 100 dwellings) on greenfield land has the potential for a negative effect. This is uncertain at this stage.* The scale of development proposed is currently unknown; however, given the size of the site (18.7ha), it is likely that the site will deliver over 100 homes. Nevertheless, uncertainty is noted at this stage.
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (Flood Zone 2 and 3).*

ISA topic	ISA objective	Significant effect?	Commentary
			Whilst the site is within fluvial Flood Zone 1, it is recognised that the eastern extent of the site is adjacent to a river, which is within fluvial Flood Zone 2 and 3.
		+	*The site does not intersect with a high surface water flood risk area (Flood Zone 2 and 3).*

Dixton with Osbaston

Residential

CS0074 - Land rear of The Royal Oak

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	-	*The site has poor access to existing employment (>1,600m from an employment centre).* The site is 2-2.5km from the nearest protected employment site (Mayhill/ Hadnock Road, Monmouth) and 20-25km from the nearest identified industrial and business site (South Woodside, Usk and Ross Road, Abergavenny).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	+	*The site has capacity to deliver new homes (<100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 10 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	-	*The site is not within reasonable walking distance (≤800m) to a primary or a secondary school (≤1,600m).* The site is 1,000-1,100m from the nearest primary school (Osbaston VC Primary) and 1,700-1,800m from the nearest secondary school (Monmouth Comprehensive).

ISA topic	ISA objective	Significant effect?	Commentary
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	The site is within 800m of a health service or an active travel route. The site is not within 800m of a health service; however, it is 55m from the nearest PRoW.
		+	*The site is within 800m of a formal leisure or green space.* The site is not within 800m of a formal leisure space; however, it is 100-200m from the nearest green space (golf course).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Dixton with Osbaston LSOA, which is amongst the 10% least deprived LSOAs in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 0-50m from the nearest bus stop (Royal Oak) and 55m from the nearest PRoW. However, it is not within reasonable walking distance to a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site wholly falls within the River Wye Catchment Area.
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*

ISA topic	ISA objective	Significant effect?	Commentary
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	-	*The site is predominantly greenfield land (>50%) and contains high quality agricultural land (Grade 1, 2 and 3a).* Part of the site is used for caravanning.
		+	*The site does not intersect with a mineral safeguarding area.*
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.* The site is 167m from the nearest priority habitat (traditional orchard), 434m from the nearest SINC (Cross Wood), and 416m from the nearest area of ancient woodland.
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	?	*Development at the site would have an uncertain effect on the historic environment.* The site is 331m from the nearest grade II listed building, 811m from the nearest conservation area (Monmouth (central)), and 982m from the nearest scheduled monument (Dixton Mound). Whilst the site is very small (0.5ha), and the nearest heritage asset is relatively far from the site and partially screened by existing development in Osbaston, it still has the potential to impact the setting of this heritage asset. Due to this, uncertainty is noted.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	+	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park.*
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (Flood Zone 2 and 3).*
		+	*The site does not intersect with a high surface water flood risk area (Flood Zone 2 and 3).*

CS0216 – Land at Hereford Road

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	-	*The site has poor access to existing employment (>1,600m from an employment centre).* The site is 2-2.5km from the nearest protected employment site (Mayhill/ Hadnock Road, Monmouth) and 20-25km from the nearest identified industrial and business site (Ross Road, Abergavenny and South Woodside, Usk).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	+	*The site has capacity to deliver new homes (<100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 65 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	+	*The site is within reasonable walking distance (≤800m) to a primary or a secondary school (≤1,600m).* The site is 700-800m from the nearest primary school (Osbaston VC Primary); however, it is 1,700-1,800m from the nearest secondary school (Monmouth Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	*The site is within 800m of a health service or an active travel route.* The site is not within 800m of a health service; however, it is 70m from the nearest PRoW.
		++	*The site is within 800m of a formal leisure and green space.* The site is 500-600m from the nearest area of amenity importance and 400-500m from the nearest green space (golf course).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Dixton with Osbaston LSOA, which is amongst the 10% least deprived LSOAs in Wales.

ISA topic	ISA objective	Significant effect?	Commentary
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 100-200m from the nearest bus stop (Royal Oak) and 70m from the nearest PRoW. However, it is not within reasonable walking distance to a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site falls wholly within the River Wye Catchment Area.
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.
		+	*The site does not intersect with a mineral safeguarding area.*
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site is 48m from the nearest priority habitat (traditional orchard), 336m from the nearest SINC (Cross Wood), and 340m from the nearest area of ancient woodland.
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	-	*Development at the site has the potential for a negative effect on the historic environment.* The site is 158m from the nearest grade II listed building and 670m from the nearest conservation area (Monmouth (central). The site is relatively large (3.8ha) and due to its proximity to the nearest grade II listed buildings, located to the north of the site, it has potential to impact its setting.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	+	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park.*
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (Flood Zone 2 and 3).*
		+	*The site does not intersect with a high surface water flood risk area (Flood Zone 2 and 3).*

CS0270 – Leasbrook (Land north of Dixton Road)

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	0	*The site has reasonable access to existing employment (800-1,600m from an employment centre).* The site is 1,300-1,400m from the nearest protected employment site (Mayhill/ Hadnock Road, Monmouth).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	++	*The site has capacity to deliver a significant number of new homes (≥ 100 dwellings) and it does not intersect with a designated green wedge.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site has capacity to deliver 270 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	+	*The site is within reasonable walking distance (≤800m) to a primary or a secondary school (≤1,600m).* The site is 1,200-1,300m from the nearest primary school (Osbaston VC Primary); however, it is 400-500m from the nearest secondary school (Monmouth Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	++	*The site is within 800m of a health service and an active travel route.* The site is 500-600m from the nearest GP surgery (Dixton Road Surgery, Monmouth) and intersects with a PRoW (375/245/1).
		++	*The site is within 800m of a formal leisure and green space.* The site is 0-50m from the nearest area of amenity importance and 300-400m from the nearest green space (religious grounds).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Drybridge 2 LSOA, which is amongst the 20-30% least deprived LSOAs in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 0-50m from the nearest bus stop (Priory End) and intersects with a PRoW (375/245/1). The site is also 330m from the nearest National Cycle Network route. However, it is not within reasonable walking distance to a neighbourhood centre or central shopping area.

ISA topic	ISA objective	Significant effect?	Commentary
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site falls wholly within the River Wye Catchment Area. In addition, the site is 282m from the nearest waterbody (river).
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.
		--	*The site is within a mineral safeguarding area.* The site intersects with a mineral safeguarding area for sand and gravel.
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.* The site is 173m from the nearest priority habitat (traditional orchard), 243m from the nearest SAC and SSSI (River Wye/ Afon Gwy), 356m from the nearest area of ancient woodland, 430m from the nearest SINC (River Monnow), and 619m from the nearest NNR (Fiddler's Elbow).

ISA topic	ISA objective	Significant effect?	Commentary
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	--	*Development at the site has the potential for a significant negative effect on the historic environment.* The southeastern boundary of the site is adjacent to a registered historic landscape (The Lower Wye Valley). In addition, the site is 15m from the nearest conservation area (Monmouth (Dixton), 171m from the nearest grade II listed building, 185m from the nearest scheduled monument (Dixton Mound), 324m from the nearest grade II* listed building, 563m from the nearest archaeologically sensitive area, and 938m from the nearest grade I listed building. The site is large (11ha), and therefore it is likely to impact the setting of the adjacent registered historic landscape, as well as the nearby conservation area and listed buildings, which are located to both the east and southwest of the site. Development also has the potential to disturb the nearby scheduled monument, which is located to the east of the site.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	?	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park; however, the site is either adjacent to/ within close proximity to one of these designated landscapes, and/ or the scale of development proposed (≥ 100 dwellings) on greenfield land has the potential for a negative effect. This is uncertain at this stage.* The site is 137m from the nearest Area of Outstanding Natural Beauty (Wye Valley), which is located to the southeast of the site.
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	-	*The site intersects with fluvial Flood Zone 2 or 3.* Less than 50% of the site intersects with fluvial Flood Zone 2 or 3. However, this is isolated to the southeastern boundary of the site.
		+	*The site does not intersect with a high surface water flood risk area (Flood Zone 2 and 3).*

Healthcare centre (D1)

CS0006 – Land at Osbaston Road

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	++	*New employment land proposed at the site.* The site will deliver a new healthcare centre (D1).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	0	*The site will deliver new employment land.*
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	0	*N/A*
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	0	*N/A*
		0	*N/A*
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Drybridge 2 LSOA, which is amongst the 20-30% least deprived LSOAs in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	0	*N/A*
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site falls wholly within the River Wye Catchment Area. In addition, the site is 146m from the nearest waterbody (river).

ISA topic	ISA objective	Significant effect?	Commentary
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.
		+	*The site does not intersect with a mineral safeguarding area.*
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.* The site is 130m from the nearest SINC (River Monnow), 190m from the nearest area of ancient woodland, and 276m from the nearest priority habitat (traditional orchard).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	-	*Development at the site has the potential for a negative effect on the historic environment.* The site is 183m from the nearest grade II listed building, 324m from the nearest conservation area (Monmouth (central)), 731m from the nearest grade II* listed building, 753m from the nearest archaeologically sensitive area, 877m from the nearest scheduled monument (Monmouth Castle), and 928m from the nearest grade I listed building. Whilst the site is relatively small (1.2ha), and adjacent to existing development to the north and east, it still has the potential to impact the setting of the nearby grade II listed building and conservation area, both located to the south of the site. Notably, there are another two grade II listed buildings located to the west of the site, and the site also has the potential to impact their setting.

ISA topic	ISA objective	Significant effect?	Commentary
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	+	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park.*
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	-	*The site intersects with fluvial Flood Zone 2 or 3.* Less than 50% of the site intersects with fluvial Flood Zone 2 or 3. However, it is noted that this is isolated along the southern boundary of the site.
		+	*The site does not intersect with a high surface water flood risk area (Flood Zone 2 and 3).*

Drybridge

Residential

SAS0076 - Land west of Rockfield Road

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	0	*The site has reasonable access to existing employment (800-1,600m from an employment centre).* The site is 1,200-1,300m from the nearest protected employment site (Wonastow Road, Monmouth).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	++	*The site has capacity to deliver a significant number of new homes (≥ 100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 130 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	-	*The site is not within reasonable walking distance (≤800m) to a primary or a secondary school (≤1,600m).*

ISA topic	ISA objective	Significant effect?	Commentary
			The site is 1,000-1,100m from the nearest primary school (Overmonnow Primary) and 2-2.5km from the nearest secondary school (Monmouth Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	*The site is within 800m of a health service or an active travel route.* The site is not within 800m of a health service; however, it intersects with a PRoW (375/127/2).
		++	*The site is within 800m of a formal leisure and green space.* The site is 0-50m from the nearest area of amenity importance and 200-300m from the nearest green space (playing field and play space). In addition, the site is 347m from the nearest National Trail.
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Drybridge 1 LSOA, which is amongst the 30-40% least deprived LSOAs in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 300-400m from the nearest bus stop (Willow Drive) and it intersects with a PRoW (375/127/2). However, it is not within reasonable walking distance to a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site falls wholly within the River Wye Catchment Area. In addition, the site is 363m from the nearest waterbody (river).
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site intersects with a Groundwater Source Protection Zone (SPZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.
		--	*The site is within a mineral safeguarding area.* The site is within a mineral safeguarding area for sand and gravel.
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.* The site is 230m from the nearest SINC (River Monnow), 322m from the nearest priority habitat (traditional orchard), and 690m from the nearest area of ancient woodland.
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	-	*Development at the site has the potential for a negative effect on the historic environment.* The site is 296m from the nearest grade II listed building and 576m from the nearest conservation area (Monmouth (central)). The site is relatively large (4.3ha), and therefore has the potential to impact the setting of the nearby grade II listed building, which is

ISA topic	ISA objective	Significant effect?	Commentary
			located to the west of the site, as well as the nearby conservation area, which is located to the northwest of the site.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	?	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park; however, the site is either adjacent to/ within close proximity to one of these designated landscapes, and/ or the scale of development proposed (≥ 100 dwellings) on greenfield land has the potential for a negative effect. This is uncertain at this stage.* The site will deliver 130 homes on agricultural land.
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (Flood Zone 2 and 3).*
		-	*The site intersects with surface water Flood Zone 2 or 3.* Less than 50% of the site intersects with surface water Flood Zone 2 or 3. However, it is recognised that this is isolated to the northeastern boundary of the site, adjacent to Rockfield Road.

CS0078 – Land adjacent to Croft y Bwla

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	0	*The site has reasonable access to existing employment (800-1,600m from an employment centre).* The site is 1,300-1,400m from the nearest protected employment site (Wonastow Road, Monmouth).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	++	*The site has capacity to deliver a significant number of new homes (≥ 100 dwellings) and it does not intersect with a designated green wedge.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site has capacity to deliver 300 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	-	*The site is not within reasonable walking distance (≤800m) to a primary or a secondary school (≤1,600m).* The site is 1,100-1,200m from the nearest primary school (Overmonnow Primary) and 2.5-3km from the nearest secondary school (Monmouth Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	*The site is within 800m of a health service or an active travel route.* The site is not within 800m of a health service; however, it intersects with two PRoWs (375/278/3 and 375/278/4).
		++	*The site is within 800m of a formal leisure and green space.* The site is 300-400m from the nearest area of amenity importance and 50-100m from the nearest green space (play space). It is also adjacent to a National Trail (Offas Dyke).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Drybridge 1 LSOA, which is amongst the 30-40% least deprived LSOAs in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 500-600m from the nearest bus stop (Willow Drive) and intersects with two PRoWs (375/278/3 and 375/278/4). However, it is not within reasonable walking distance to a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*

ISA topic	ISA objective	Significant effect?	Commentary
	To conserve, protect and enhance the water environment, water quality and water resources.	-	The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area. The site falls wholly within the River Wye Catchment Area. In addition, the site is 329m from the nearest waterbody (river).
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.
		--	*The site is within a mineral safeguarding area.* The site is within a mineral safeguarding area for sand and gravel.
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.* The site is 102m from the nearest priority habitat (traditional orchard), 210m from the nearest SINC (River Monnow), and 392m from the nearest area of ancient woodland.
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	--	*The site intersects or is adjacent to an internationally (SAC, SPA, Ramsar) or nationally (SSSI, Ancient Woodland, NNRs) designated site.* The site is 94m from the nearest grade II listed building and 787m from the nearest conservation area (Monmouth (central)).

ISA topic	ISA objective	Significant effect?	Commentary
			The site is large (13.6ha), and therefore it is likely to impact the setting of the grade II listed building, which is located to the west of the site. The site also has the potential to impact the setting of the nearest conservation area.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	?	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park; however, the site is either adjacent to/ within close proximity to one of these designated landscapes, and/ or the scale of development proposed (≥ 100 dwellings) on greenfield land has the potential for a negative effect. This is uncertain at this stage.* The site will deliver 300 homes on agricultural land.
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (Flood Zone 2 and 3).*
		-	*The site intersects with surface water Flood Zone 2 or 3.* Less than 50% of the site intersects with surface water Flood Zone 2 or 3. However, it is recognised that this is largely isolated to the northeastern and southwestern boundaries of the site.

CS0099 – Land at Drybridge Farm

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	0	*The site has reasonable access to existing employment (800-1,600m from an employment centre).* The site is 1,000-1,100m from the nearest protected employment site (Wonastow Road, Monmouth).

ISA topic	ISA objective	Significant effect?	Commentary
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	++	*The site has capacity to deliver a significant number of new homes (≥ 100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 563-675 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	++	*The site is within reasonable walking distance (≤800m) to a primary and a secondary school (≤1,600m).* The site is 600-700m from the nearest primary school (Overmonnow Primary) and 1,400-1,500m from the nearest secondary school (Monmouth Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	++	*The site is within 800m of a health service and an active travel route.* The site is 700-800m from the nearest dentist (Gilbert Technical Dental Services, Monmouth) and intersects with two PRoWs (375/133/1 and 375/134/4).
		++	*The site is within 800m of a formal leisure and green space.* The site is 0-50m from the nearest area of amenity importance and 200-300m from the nearest green space (playing field and play space). It is also 322m from the nearest National Trail.
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Drybridge 1 LSOA, which is amongst the 30-40% least deprived LSOAs in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	++	*The site is within close proximity (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, and an active travel route.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site is 50-100m from the nearest bus stop (Rolls Avenue), 600-700m from the nearest central shopping area (Monmouth) and intersects with two PRoWs (375/133/1 and 375/134/4). It is also 705m from the nearest National Cycle Network route.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 46m from the nearest waterbody (river) and falls wholly within the River Wye Catchment Area.
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.
		--	*The site is within a mineral safeguarding area.* The site is within a mineral safeguarding area for sand and gravel.
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.* The site is 1m from the nearest SINC (River Monnow), 257m from the nearest priority habitat (traditional orchard), and 321m from the nearest area of ancient woodland.

ISA topic	ISA objective	Significant effect?	Commentary
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	--	*Development at the site has the potential for a significant negative effect on the historic environment.* The site is 102m from the nearest grade II listed building, 104m from the nearest conservation area (Monmouth (central)), 562m from the nearest archaeologically sensitive area, 581m from the nearest scheduled monument (Monmouth Castle) and grade II* listed building, and 636m from the nearest grade I listed building. The site is large (22.5 ha), and therefore it is likely to impact the setting of several nearby grade II listed buildings, located to the north and east of the site, as well as the conservation area, located to the southeast of the site. Development also has the potential to disturb nearby archaeological remains.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	?	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park; however, the site is either adjacent to/ within close proximity to one of these designated landscapes, and/ or the scale of development proposed (≥ 100 dwellings) on greenfield land has the potential for a negative effect. This is uncertain at this stage.* The site will deliver 563-675 homes on agricultural land.
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (Flood Zone 2 and 3).* Whilst the site is within fluvial Flood Zone 1, it is recognised that the land to the north and east of the site, following the path of the River Monnow, is within Flood Zone 2 and 3.
		+	*The site does not intersect with a high flood risk area (Flood Zone 2 and 3).*

CS0277 – Drewen Farm Monmouth

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	+	*The site has good access to existing employment (≤800m from an employment centre).* The site is 200-300m from the nearest protected employment site (Wonastow Road, Monmouth).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	++	*The site has capacity to deliver a significant number of new homes (≥ 100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 110 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	+	*The site is within reasonable walking distance (≤800m) to a primary or a secondary school (≤1,600m).* The site is 700-800m from the nearest primary school (Overmonnow Primary) and 2-2.5km from the nearest secondary school (Monmouth Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	*The site is within 800m of a health service or an active travel route.* The site is not within 800m of a health service; however, it intersects with a PRoW (375/267/1).
		++	*The site is within 800m of a formal leisure and green space.* The site is 0-50m from the nearest area of amenity importance and 600-700m from the nearest green space (play space). It is also 1m from the nearest National Trail.
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Drybridge 1 LSOA, which is amongst the 30-40% least deprived LSOAs in Wales.

ISA topic	ISA objective	Significant effect?	Commentary
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 100-200m from the nearest bus stop (Acer Way) and intersects with a PRoW (375/267/1). It is also 391m from the nearest National Cycle Network route. However, it is not within reasonable walking distance to a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site falls wholly within the River Wye Catchment Area. It is also 216m from the nearest waterbody (river).
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.
		--	*The site is within a mineral safeguarding area.* The site is within a mineral safeguarding area for sand and gravel.

ISA topic	ISA objective	Significant effect?	Commentary
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	--	*The site intersects or is adjacent to an internationally (SAC, SPA, Ramsar) or nationally (SSSI, Ancient Woodland, NNRs) designated site.* The northwestern boundary of the site is adjacent to an area of ancient woodland. In addition, the southeastern boundary of the site is adjacent to a SINC (Wonastow Field). It is also 530m from the nearest priority habitat (traditional orchard).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	?	*Development at the site would have an uncertain effect on the historic environment.* The site is 639m from the nearest conservation area (Monmouth (central)), 699m from the nearest grade II listed building, 700m from the nearest archaeologically sensitive area, 707m from the nearest scheduled monument (Clawdd Du), 729m from the nearest grade II* listed building, and 948m from the nearest grade I listed building. Whilst the site is relatively large (6.6ha), the nearest heritage asset is relatively far from the site and separated from the site by existing development. Nevertheless, uncertainty is noted at this stage.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	?	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park; however, the site is either adjacent to/ within close proximity to one of these designated landscapes, and/ or the scale of development proposed (≥ 100 dwellings) on greenfield land has the potential for a negative effect. This is uncertain at this stage.* The site will deliver 110 homes on agricultural land.
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (Flood Zone 2 and 3).*
		-	*The site intersects with surface water Flood Zone 2 or 3.*

ISA topic	ISA objective	Significant effect?	Commentary
			Less than 50% of the site intersects with surface water Flood Zone 2 or 3. However, it is recognised that this is isolated to a couple of small areas in the eastern half of the site.

Residential and Employment

CS0051 – Land at Croft y Bwla Farm

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	++	*New employment land proposed at the site.* The site is proposed for mixed-use development, including employment use.
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	++	*The site has capacity to deliver a significant number of new homes (≥ 100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 900 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	-	*The site is not within reasonable walking distance (≤800m) to a primary or a secondary school (≤1,600m).* The site is 900-1,000m from the nearest primary school (Overmonnow Primary) and 2.5-3km from the nearest secondary school (Monmouth Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	*The site is within 800m of a health service or an active travel route.* The site is not within 800m of a health service; however, it intersects with five PRoWs (375/38/1, 375/39/1, 375/40/1, 375/42/1 and 375/266/1).

ISA topic	ISA objective	Significant effect?	Commentary
		+	*The site is within 800m of a formal leisure or green space.* The site is 300-400m from the nearest area of amenity importance and intersects with a National Trail (Offas Dyke). However, the site is not within 800m of a formal green space.
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Drybridge 1 LSOA, which is amongst the 30-40% least deprived LSOAs in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site intersects with five PRoWs (375/38/1, 375/39/1, 375/40/1, 375/42/1 and 375/266/1). In addition, it is 763m from the nearest National Cycle Network route. However, the site is not within reasonable walking distance to a railway station or bus stop or a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site wholly falls within the River Wye Catchment Area. In addition, the site is 409m from the nearest waterbody (river).
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*

ISA topic	ISA objective	Significant effect?	Commentary
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.
		--	*The site is within a mineral safeguarding area.* The site is within a mineral safeguarding area for sand and gravel.
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	--	*The site intersects or is adjacent to an internationally (SAC, SPA, Ramsar) or nationally (SSSI, Ancient Woodland, NNRs) designated site.* The southwestern extent of the site intersects with an area of ancient woodland, and the northwestern extent of the site intersects with a SINC (Croft-y-Bwla). In addition, the northeastern boundary of the site is adjacent to a priority habitat (traditional orchard).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	--	*Development at the site has the potential for a significant negative effect on the historic environment.* The site is 104m from the nearest grade II listed building, 690m from the nearest conservation area (Rockfield), 983m from the nearest archaeologically sensitive area, 986m from the nearest grade II* listed building, and 997m from the nearest scheduled monument (Clawdd Du). The site is very large (49ha) and is therefore likely to impact the setting of the nearby grade II listed building, which is located to the northeast of the site. Whilst further away, the site also has the potential to impact the setting of the nearest conservation area, located to the north of the site, as there is open land between the site and the conservation area. However, it is recognised that trees provide a degree of screening to the conservation area.

ISA topic	ISA objective	Significant effect?	Commentary
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	?	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park; however, the site is either adjacent to/ within close proximity to one of these designated landscapes, and/ or the scale of development proposed (≥ 100 dwellings) on greenfield land has the potential for a negative effect. This is uncertain at this stage.* The site will deliver 900 homes on agricultural land.
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (Flood Zone 2 and 3).*
		-	*The site intersects with surface water Flood Zone 2 or 3.* Less than 50% of the site intersects with surface water Flood Zone 2 or 3. However, it is recognised that this is largely isolated to a drain that runs through the northern extent of the site.

Employment (B1 / B2 / B8)

CS0275 – Land off Wonastow Industrial Estate

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	++	*New employment land proposed at the site.*
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	0	*The site will deliver new employment land.*
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	0	*N/A*

ISA topic	ISA objective	Significant effect?	Commentary
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	0	*N/A*
		0	*N/A*
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	0	*The site falls within one of the 20-30% most deprived LSOAs in Wales.* The site is relatively deprived – in the 2nd quintile most deprived in the country.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	0	*N/A*
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	0	The site does not contain and is not in close proximity to a waterbody, nor does it fall within the River Wye Catchment Area.
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* This site is Grade 1 to Grade 3A agricultural land.
		--	*The site is wholly within a mineral safeguarding area.* This site is within a mineral safeguarding area for sand and gravel.

ISA topic	ISA objective	Significant effect?	Commentary
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	-	*The site intersects or is adjacent to a regionally or locally (LNRs and SINCs) designated site and/ or priority habitats/ species.* The site intersects the Wonastow Field SINC (1.43% overlap). It is 502m from the nearest area of ancient woodland, 708m from the nearest priority habitat (traditional orchard), and 1,330m from the nearest SAC and SSSI (River Wye / Afon Gwy).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	?	*Development at the site would have an uncertain effect on the historic environment.* The site is 580m from the nearest conservation area (Monmouth (central)). In addition, the site is 543m from the nearest archaeologically sensitive area, 584m from the nearest grade II* listed building, 550m from the nearest grade II listed building, 437m from the nearest scheduled monument (Monmouth Castle), and 819m from the nearest grade I listed building.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	+	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park.*
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	--	*The site falls wholly within fluvial Flood Zone 2 or 3.* The entire site intersects with fluvial Flood Zone 2.
		-	*The site intersects with surface water Flood Zone 2 or 3.* Less than 50% of the site intersects with surface water Flood Zone 2 or 3.

Employment (B1 new build)

CS0272 – Land at Former Poultry Units, Rockfield Road

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	++	New employment land proposed at the site. The site is proposed for employment use (B1 new build).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	0	*The site will deliver new employment land.*
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	0	*N/A*
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	0	*N/A*
		0	*N/A*
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Drybridge 1 LSOA, which is amongst the 30-40% least deprived LSOAs in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	0	*N/A*
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site is 76m from the nearest waterbody (river) and falls wholly within the River Wye Catchment Area.
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	++	*The site is wholly brownfield land.* The site currently comprises poultry units.
		--	*The site is within a mineral safeguarding area.* The site is within a mineral safeguarding area for sand and gravel.
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.* The site is 76m from the nearest area of ancient woodland, 319m from the nearest SINC (River Monnow), 393m from the nearest priority habitat (traditional orchard), and 886m from the nearest SAC and SSSI (River Wye/ Afon Gwy).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	+	*Regeneration of brownfield land that is currently detracting from the historic environment.* The eastern boundary of the site is adjacent to a conservation area (Monmouth (central)). In addition, the site is 341m from the nearest archaeologically sensitive area, 359m from the nearest grade II* listed building, 371m from the nearest grade II listed building, 437m from the nearest scheduled monument (Monmouth Castle), and 488m from the nearest grade I listed building.

ISA topic	ISA objective	Significant effect?	Commentary
			Whist the site is small and (1.3ha) and partially shielded by trees, as it comprises poultry units it is likely currently detracting from the historic environment. Therefore, development has the potential to improve the setting of the adjacent conservation area. However, it is also recognised that development has the potential to disturb nearby archaeological remains.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	++	*The site is predominantly brownfield and does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park.*
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	--	*The site falls wholly within fluvial Flood Zone 2 or 3.* The entire site intersects with fluvial Flood Zone 2.
		-	*The site intersects with surface water Flood Zone 2 or 3.* Less than 50% of the site intersects with surface water Flood Zone 2 or 3.

Mixed Use: Residential (C3), Flexible Office Space (B1) and Doctor's Surgery / Medical Centre (D1)

CS0136 – Land at former Poultry Units, Rockfield Road

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	++	*New employment land proposed at the site.* The site is proposed for mixed-use development, including employment uses (flexible office space and a GP surgery/ medical centre).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	+	*The site has capacity to deliver new homes (<100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 48 new homes.

ISA topic	ISA objective	Significant effect?	Commentary
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	++	*The site is within reasonable walking distance (≤800m) to a primary and a secondary school (≤1,600m).* The site is 400-500m from the nearest primary school (Overmonnow Primary) and 1,500-1,600m from the nearest secondary school (Monmouth Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	++	*The site is within 800m of a health service and an active travel route.* The site is 700-800m from the nearest GP surgery (Monnow Eyecare, Monmouth) and hospital (Monnow Vale Health and Social Care Facility and Overmonnow Day Hospital, both in Monmouth), and 130m from the nearest PRoW.
		++	*The site is within 800m of a formal leisure and green space.* The site is 0-50m from the nearest area of amenity importance and 200-300m from the nearest green space (play space). It is also 70m from the nearest National Trail.
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Drybridge 1 LSOA, which is amongst the 30-40% least deprived LSOAs in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	++	*The site is within close proximity (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, and an active travel route.* The site is 50-100m from the nearest bus stop (Ancre Hill), 500-600m from the nearest central shopping area (Monmouth) and 130m from the nearest PRoW. It is also 376m from the nearest National Cycle Network route.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*

ISA topic	ISA objective	Significant effect?	Commentary
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 76m from the nearest waterbody (river) and falls wholly within the River Wye Catchment Area.
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	++	*The site is wholly brownfield land.* The site currently comprises poultry units.
		--	*The site is within a mineral safeguarding area.* The site is within a mineral safeguarding area for sand and gravel.
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.* The site is 76m from the nearest area of ancient woodland, 319m from the nearest SINC (River Monnow), 393m from the nearest priority habitat (traditional orchard), and 886m from the nearest SAC and SSSI (River Wye/ Afon Gwy).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	+	*Regeneration of brownfield land that is currently detracting from the historic environment.* The eastern boundary of the site is adjacent to a conservation area (Monmouth (central)). In addition, the site is 341m from the nearest archaeologically sensitive area, 359m from the nearest grade II*

ISA topic	ISA objective	Significant effect?	Commentary
			listed building, 371m from the nearest grade II listed building, 437m from the nearest scheduled monument (Monmouth Castle), and 488m from the nearest grade I listed building. Whist the site is small and (1.3ha) and partially shielded by trees, as it comprises poultry units it is likely currently detracting from the historic environment. Therefore, development has the potential to improve the setting of the adjacent conservation area. However, it is also recognised that development has the potential to disturb nearby archaeological remains.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	++	*The site is predominantly brownfield and does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park.*
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	--	*The site falls wholly within fluvial Flood Zone 2 or 3.* The entire site intersects with fluvial Flood Zone 2.
		-	*The site intersects with surface water Flood Zone 2 or 3.* Less than 50% of the site intersects with surface water Flood Zone 2 or 3.

Mixed Use: Residential (C3), Employment (B1 / B2 / B8) and Community Use

CS0274 – Land north of Wonastow Road

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	++	*New employment land proposed at the site.* The site is proposed for mixed-use development, including employment use (B1/ B2/ B8).

ISA topic	ISA objective	Significant effect?	Commentary
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	++	*The site has capacity to deliver a significant number of new homes (≥ 100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 175 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	-	*The site is not within reasonable walking distance (≤800m) to a primary or a secondary school (≤1,600m).* The site is 1,500-1,600m from the nearest primary school (Overmonnow Primary) and 2.5-3km from the nearest secondary school (Monmouth Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	*The site is within 800m of a health service or an active travel route.* The site is not within 800m of a health service; however, it intersects with a PRoW (375/51/1).
		++	*The site is within 800m of a formal leisure and green space.* The site is 300-400m from the nearest area of amenity importance and 600-700m from the nearest green space (playing field). It is also 574m from the nearest National Trail.
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	0	*The site falls within one of the 20-30% most deprived LSOAs in Wales.* The site primarily falls within the Drybridge 1 LSOA, which is amongst the 30-40% least deprived LSOAs in Wales. However, it also falls within the Overmonnow 2 LSOA, which is amongst the 20-30% most deprived LSOAs in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site is 300-400m from the nearest bus stop (Link Road, Acer Way and Redhill Farmhouse) and it intersects with a PRoW (375/51/1). It is also 2m from the nearest National Cycle Network route. However, it is not within reasonable walking distance to a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site falls wholly within the River Wye Catchment Area. It is also 772m from the nearest waterbody (river).
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.
		--	*The site is within a mineral safeguarding area.* The site is within a mineral safeguarding area for sand and gravel.
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site is 114m from the nearest priority habitat (traditional orchard), 234m from the nearest area of ancient woodland, and 263m from the nearest SINC (Wonastow Field).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	?	*Development at the site would have an uncertain effect on the historic environment.* The site is 559m from the nearest grade II listed building, 895m from the nearest archaeologically sensitive area, 909m from the nearest scheduled monument (Clawdd Du), 921m from the nearest grade II* listed building, and 979m from the nearest conservation area (Monmouth (central)). Whilst the site is large (11ha), the nearest grade II listed building is still relatively far from the site and partially screened by trees. Nevertheless, a degree of uncertainty is noted at this stage.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	?	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park; however, the site is either adjacent to/ within close proximity to one of these designated landscapes, and/ or the scale of development proposed (≥ 100 dwellings) on greenfield land has the potential for a negative effect. This is uncertain at this stage.* The site is 989m from the nearest Area of Outstanding Natural Beauty (Wye Valley) and will deliver 175 homes on agricultural land.
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (Flood Zone 2 and 3).*
		-	*The site intersects with surface water Flood Zone 2 or 3.* Less than 50% of the site intersects with surface water Flood Zone 2 or 3. However, it is recognised that this is isolated to two small areas within the site.

Mixed Use: Residential (C3), Residential Care (C2), Community hub (A1 / A3 / D1)

CS0271 – Land at Vauxhall Fields

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	++	*New employment land proposed at the site.* The site is proposed for mixed-use development, including employment uses (care home).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	++	*The site has capacity to deliver a significant number of new homes (≥ 100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 179 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	++	*The site is within reasonable walking distance (≤800m) to a primary and a secondary school (≤1,600m).* The site is 300-400m from the nearest primary school (Overmonnow Primary) and 800-900m from the nearest secondary school (Monmouth Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	++	*The site is within 800m of a health service and an active travel route.* The site is 100-200m from the nearest dentist (Gilbert Technical Dental Services, Monmouth), 200-300m from the nearest GP surgery (Monmouthshire Hearing Centre, Monmouth), 300-400m from the nearest hospital (Monnow Vale Health and Social Care Facility, Monmouth), and intersects with two PRoWs (375/134/3 and 375/134/4).
		++	*The site is within 800m of a formal leisure and green space.* The site is 0-50m from the nearest area of amenity importance and 100-200m from the nearest green space (play space). It is also 74m from the nearest National Trail.

ISA topic	ISA objective	Significant effect?	Commentary
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Drybridge 1 and Drybridge 2 LSOAs, which are amongst the 30-40% and 20-30% least deprived LSOAs in Wales respectively.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	++	*The site is within close proximity (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, and an active travel route.* The site is 0-50m from the nearest bus stop (Ancre Hill), 50-100m from the nearest central shopping area (Monmouth) and intersects with two PRoWs (375/134/3 and 375/134/4). It is also 700-800m from the nearest neighbourhood centre (The Albion, Monmouth) and 185m from the nearest National Cycle Network route.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 12m from the nearest waterbody (river) and falls wholly within the River Wye Catchment Area.
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.
		--	*The site is within a mineral safeguarding area.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site is within a mineral safeguarding area for sand and gravel.
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.* The site is 2m from the nearest SINC (River Monnow), 35m from the nearest area of ancient woodland, 108m from the nearest priority habitat (traditional orchard), and 470m from the nearest SAC and SSSI (River Wye/ Afon Gwy).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	--	*Development at the site has the potential for a significant negative effect on the historic environment.* The southeastern half of the site (59% overlap) intersects with a conservation area (Monmouth (central)). The southeastern extent of the site also intersects with a registered historic landscape (The Lower Wye Valley). In addition, the site is 27m from the nearest archaeologically sensitive area, 46m from the nearest scheduled monument (Monmouth Castle), 78m from the nearest grade II listed building, 94m from the nearest grade I listed building, and 100m from the nearest grade II* listed building. The site is large (18.8ha), and as over half of the site intersects with a conservation area, it is likely to significantly impact its setting, as well as the setting of the registered historic landscape. Development is also likely to disturb nearby archaeological remains, as well as the setting of numerous listed buildings to the east of the site, which are primarily locate along Monnow Street/ Priory Street.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	?	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park; however, the site is either adjacent to/ within close proximity to one of these designated landscapes, and/ or the scale of development proposed (≥ 100*

ISA topic	ISA objective	Significant effect?	Commentary
			dwellings) on greenfield land has the potential for a negative effect. This is uncertain at this stage. The site is 871m from the nearest Area of Outstanding Natural Beauty (Wye Valley) and will deliver 179 homes on agricultural land.
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	-	*The site intersects with fluvial Flood Zone 2 or 3.* Over 50% of the site intersects with fluvial Flood Zone 2 or 3, which is largely concentrated in the southeastern half of the site.
		-	*The site intersects with surface water Flood Zone 2 or 3.* Less than 50% of the site intersects with surface water Flood Zone 2 or 3. However, surface water flood risk is isolated to a few small areas within the site.

Agriculture

LS0275 - Land off Wonastow Industrial Estate

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	?	*Type of development uncertain at this stage.*
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	?	*N/A*
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	0	*N/A*
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	0	*N/A*

ISA topic	ISA objective	Significant effect?	Commentary
		0	*N/A*
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	0	*The site falls within one of the 20-30% most deprived LSOAs in Wales.* The site is relatively deprived – in the 2nd quintile most deprived in the country.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	0	*N/A*
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	0	The site does not contain and is not in close proximity to a waterbody, nor does it fall within the River Wye Catchment Area.
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* This site is Grade 1 to Grade 3A agricultural land.
		--	*The site is wholly within a mineral safeguarding area.* This site is within a mineral safeguarding area for sand and gravel.
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	-	*The site intersects or is adjacent to a regionally or locally (LNRs and SINCs) designated site and/ or priority habitats/ species.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site intersects the Wonastow Field SINC (1.43% overlap). It is 502m from the nearest area of ancient woodland, 708m from the nearest priority habitat (traditional orchard), and 1,330m from the nearest SAC and SSSI (River Wye / Afon Gwy).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	?	*Development at the site would have an uncertain effect on the historic environment.* The site is 580m from the nearest conservation area (Monmouth (central)). In addition, the site is 543m from the nearest archaeologically sensitive area, 584m from the nearest grade II* listed building, 550m from the nearest grade II listed building, 437m from the nearest scheduled monument (Monmouth Castle), and 819m from the nearest grade I listed building.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	+	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park.*
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	--	*The site falls wholly within fluvial Flood Zone 2 or 3.* The entire site intersects with fluvial Flood Zone 2.
		-	*The site intersects with surface water Flood Zone 2 or 3.* Less than 50% of the site intersects with surface water Flood Zone 2 or 3.

Goetre Fawr

Residential

CS0138 – Land at Goytre Farm

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	-	*The site has poor access to existing employment (>1,600m from an employment centre).* The site is 4-5km from the nearest protected employment site (Mamhilad).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	++	*The site has capacity to deliver a significant number of new homes (≥ 100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 110 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	-	*The site is not within reasonable walking distance (≤800m) to a primary or a secondary school (≤1,600m).* The site is 900-1,000m from the nearest primary school (Goytre Fawr Primary) and 10-15km from the nearest secondary school (King Henry VIII Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	*The site is within 800m of a health service or an active travel route.* The site is not within 800m of a health service; however, it intersects with a PRoW (358/63/1).
		++	*The site is within 800m of a formal leisure and green space.* The site is 600-700m from the nearest area of amenity importance and 700-800m from the nearest green space (playing field and religious grounds).

ISA topic	ISA objective	Significant effect?	Commentary
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Goetre Fawr 1 LSOA, which is amongst the 10-20% least deprived LSOAs in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 100-200m from the nearest bus stop (Parklands) and it intersects with a PRoW (358/63/1). It is also 515m from the nearest National Cycle Network route. However, it is not within reasonable walking distance to a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site intersects with a waterbody (river).
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.
		+	*The site does not intersect with a mineral safeguarding area.*

ISA topic	ISA objective	Significant effect?	Commentary
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	--	*The site intersects or is adjacent to an internationally (SAC, SPA, Ramsar) or nationally (SSSI, Ancient Woodland, NNRs) designated site.* The northeastern part of the site intersects with an area of ancient woodland (5% overlap), whilst the southeastern half of the site intersects with a SINC (Capel Ed Lane/ Wern Fawr, Chapel Lane Meadow) (61% overlap). In addition, the southern part of the site intersects with a priority habitat (wood pasture), as does the northeastern part of the site (lowland meadows).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	?	*Development at the site would have an uncertain effect on the historic environment.* The site is 396m from the nearest grade II listed building. Whilst the site is large (10ha), the nearest grade II listed buildings are all relatively far from the site and screened by either trees or existing development.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	?	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park; however, the site is either adjacent to/ within close proximity to one of these designated landscapes, and/ or the scale of development proposed (≥ 100 dwellings) on greenfield land has the potential for a negative effect. This is uncertain at this stage.* The site is 513m from the nearest National Park (Brecon Beacons) and will deliver 110 homes on agricultural land.
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (Flood Zone 2 and 3).*
		-	*The site intersects with surface water Flood Zone 2 or 3.*

ISA topic	ISA objective	Significant effect?	Commentary
			Less than 50% of the site intersects with surface water Flood Zone 2 or 3. However, it is recognised that this is isolated to the eastern boundary of the site.

CS0280 – Land at Walnut Tree Farm

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	-	*The site has poor access to existing employment (>1,600m from an employment centre).* The site is 3-4km from the nearest protected employment site (Mamhilad).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	+	*The site has capacity to deliver new homes (<100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 70 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	+	*The site is within reasonable walking distance (≤800m) to a primary or a secondary school (≤1,600m).* The site is 300-400m from the nearest primary school (Goytre Fawr Primary); however, it is 10-15km from the nearest secondary school (King Henry VIII Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	++	*The site is within 800m of a health service and an active travel route.* The site is 300-400m from the nearest hospital (Aderyn, Goytre) and 46m from the nearest PRoW.
		++	*The site is within 800m of a formal leisure and green space.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site is 100-200m from the nearest area of amenity importance and green space (playing field).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Goetre Fawr 1 and Goetre Fawr 2 LSOAs, which are amongst the 10-20% and 30-40% least deprived LSOAs in Wales respectively.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 300-400m from the nearest bus stop (Fairfield, Goytre Arms) and 46m from the nearest PRoW. It is also 661m from the nearest National Cycle Network route. However, it is not within reasonable walking distance to a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 236m from the nearest waterbody (river).
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.

ISA topic	ISA objective	Significant effect?	Commentary
		--	*The site is within a mineral safeguarding area.* The site is within a mineral safeguarding area for sand and gravel.
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.* The site is 201m from the nearest area of ancient woodland, 210m from the nearest SINC (Ynys-y-pica Wood), and 274m from the nearest priority habitat (purple moor grass and rush pastures).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	0	*Development at this site will have a neutral effect on the historic environment.* The site is 513m from the nearest grade II listed building. The site is relatively small (3ha) and far away from the nearest grade II listed building, which is screened from the site by existing development. Due to this, neutral effects are considered likely.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	?	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park; however, the site is either adjacent to/ within close proximity to one of these designated landscapes, and/ or the scale of development proposed (≥ 100 dwellings) on greenfield land has the potential for a negative effect. This is uncertain at this stage.* The site is 660m from the nearest National Park (Brecon Beacons).
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (Flood Zone 2 and 3).*
		-	*The site intersects with surface water Flood Zone 2 or 3.*

ISA topic	ISA objective	Significant effect?	Commentary
			Less than 50% of the site intersects with surface water Flood Zone 2 or 3. However, it is recognised that this is isolated to one small area in the eastern part of the site.

CS0279 – Land west Usk Road

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	-	*The site has poor access to existing employment (>1,600m from an employment centre).* The site is 3-4km from the nearest protected employment site (Mamhilad).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	+	*The site has capacity to deliver new homes (<100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 85 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	+	*The site is within reasonable walking distance (≤800m) to a primary or a secondary school (≤1,600m).* The site is 100-200m from the nearest primary school (Goytre Fawr Primary); however, it is 10-15km from the nearest secondary school (King Henry VIII Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	++	*The site is within 800m of a health service and an active travel route.* The site is 100-200m from the nearest hospital (Aderyn, Goytre) and 165m from the nearest PRoW.
		++	*The site is within 800m of a formal leisure and green space.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site is 50-100m from the nearest area of amenity importance and green space (play space and playing field).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Goetre Fawr 2 LSOA, which is amongst the 30-40% least deprived LSOAs in Wales respectively.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 50-100m from the nearest bus stop (Goytre Arms) and 165m from the nearest PRoW. It is also 205m from the nearest National Cycle Network route. However, it is not within reasonable walking distance to a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 47m from the nearest waterbody (lake).
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.

ISA topic	ISA objective	Significant effect?	Commentary
		+	*The site does not intersect with a mineral safeguarding area.*
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	--	*The site intersects or is adjacent to an internationally (SAC, SPA, Ramsar) or nationally (SSSI, Ancient Woodland, NNRs) designated site.* The southwestern corner of the site intersects with an area of ancient woodland (0.5% overlap). In addition, the northwestern corner of the site is adjacent to a priority habitat (traditional orchard). The site is also 105m from the nearest SINC (Land west of Fairfield, Penperlleni).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	--	*Development at the site has the potential for a significant negative effect on the historic environment.* The site is 18m from the nearest grade II listed building. The site is relatively large (4.3ha), and whilst Parc-y-Brain Lane provides a degree of separation between the site and the nearest grade II listed building to the north of the site, development is still likely to significantly impact the setting of this heritage asset.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	?	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park; however, the site is either adjacent to/ within close proximity to one of these designated landscapes, and/ or the scale of development proposed (≥ 100 dwellings) on greenfield land has the potential for a negative effect. This is uncertain at this stage.* The site is 204m from the nearest National Park (Brecon Beacons).
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (Flood Zone 2 and 3).*
		-	*The site intersects with surface water Flood Zone 2 or 3.*

ISA topic	ISA objective	Significant effect?	Commentary
			Less than 50% of the site intersects with surface water Flood Zone 2 or 3. However, it is recognised that this is isolated to five small areas across the site.

CS0037 – Land south of Usk Road Penperlleni

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	-	*The site has poor access to existing employment (>1,600m from an employment centre).* The site is 2.5-3km from the nearest protected employment site (Mamhilad).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	+	*The site has capacity to deliver new homes (<100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 49 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	+	*The site is within reasonable walking distance (≤800m) to a primary or a secondary school (≤1,600m).* The site is 200-300m from the nearest primary school (Goytre Fawr Primary); however, it is 10-15km from the nearest secondary school (King Henry VIII Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	++	*The site is within 800m of a health service and an active travel route.* The site is 200-300m from the nearest hospital (Aderyn, Goytre) and 134m from the nearest PRoW.
		++	*The site is within 800m of a formal leisure and green space.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site is 200-300m from the nearest area of amenity importance and 300-400m from the nearest green space (playing field, playing space and public park or garden).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Goetre Fawr 2 LSOA, which is amongst the 30-40% least deprived LSOAs in Wales respectively.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 0-50m from the nearest bus stop (Croes-y-pant Lane) and 134m from the nearest PRoW. It is also 136m from the nearest National Cycle Network route. However, it is not within reasonable walking distance to a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The northeastern and southeastern boundaries of the site are adjacent to a waterbody (river).
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).*

ISA topic	ISA objective	Significant effect?	Commentary
	development and protecting, where possible, higher grade agricultural land.		The site is currently used for agriculture.
		+	*The site does not intersect with a mineral safeguarding area.*
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.* The site is 34m from the nearest area of ancient woodland, 154m from the nearest priority habitat (lowland meadows), and 356m from the nearest SINC (Goytre House Wood).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	-	*Development at the site has the potential for a negative effect on the historic environment.* The site is 215m from the nearest grade II listed building. The site is relatively large (3.4ha), and therefore has the potential to impact the setting of several nearby grade II listed buildings. However, it is recognised that these buildings are relatively well screened by trees and/ or existing development.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	?	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park; however, the site is either adjacent to/ within close proximity to one of these designated landscapes, and/ or the scale of development proposed (≥ 100 dwellings) on greenfield land has the potential for a negative effect. This is uncertain at this stage.* The site is 133m from the nearest National Park (Brecon Beacons).
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (Flood Zone 2 and 3).*
		-	*The site intersects with surface water Flood Zone 2 or 3.*

ISA topic	ISA objective	Significant effect?	Commentary
			Less than 50% of the site intersects with surface water Flood Zone 2 or 3.

CS0217 – Land at Fairfield

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	+	*The site has poor access to existing employment (>1,600m from an employment centre).* The site is 3-4km from the nearest protected employment site (Mamhilad).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	+	*The site has capacity to deliver new homes (<100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 42 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	+	*The site is within reasonable walking distance (≤800m) to a primary or a secondary school (≤1,600m).* The site is 300-400m from the nearest primary school (Goytre Fawr Primary); however, it is 10-15km from the nearest secondary school (King Henry VIII Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	++	*The site is within 800m of a health service and an active travel route.* The site is 300-400m from the nearest hospital (Aderyn, Goytre) and intersects with a PRoW (358/68/1).
		++	*The site is within 800m of a formal leisure and green space.* The site is 100-200m from the nearest area of amenity importance and green space (play space and playing field).

ISA topic	ISA objective	Significant effect?	Commentary
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Goetre Fawr 1 and Goetre Fawr 2 LSOAs, which are amongst the 10-20% and 30-40% least deprived LSOAs in Wales respectively.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 50-100m from the nearest bus stop (Goytre Arms) and intersects with a PRoW (358/68/1). It is also 498m from the nearest National Cycle Network route. However, it is not within reasonable walking distance to a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 185m from the nearest waterbody (river).
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.
		+	*The site does not intersect with a mineral safeguarding area.*

ISA topic	ISA objective	Significant effect?	Commentary
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	-	*The site intersects or is adjacent to a regionally or locally (LNRs and SINCs) designated site and/ or priority habitats/ species.* The site almost wholly intersects with a SINC (Land west of Fairfield, Penperlleni) (97% overlap). In addition, the site is 136m from the nearest priority habitat (traditional orchard) and 283m from the nearest area of ancient woodland.
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	-	*Development at the site has the potential for a negative effect on the historic environment.* The site is 123m from the nearest grade II listed building. Whilst the site is relatively small (1.8ha), and on the other side of the A4042, it still has the potential to impact the setting of the nearest grade II listed building, which is located to the southwest of the site.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	?	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park; however, the site is either adjacent to/ within close proximity to one of these designated landscapes, and/ or the scale of development proposed (≥ 100 dwellings) on greenfield land has the potential for a negative effect. This is uncertain at this stage.* The site is 497m from the nearest National Park (Brecon Beacons).
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (Flood Zone 2 and 3).*
		-	*The site intersects with surface water Flood Zone 2 or 3.* Less than 50% of the site intersects with surface water Flood Zone 2 or 3.

CS0104 – Cae Melin Little Mill

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	-	*The site has poor access to existing employment (>1,600m from an employment centre).* The site is 2.5-3km from the nearest protected employment site (Mamhilad).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	+	*The site has capacity to deliver new homes (<100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 74 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	--	*The site is >1,600m from a primary school and secondary school.* The site is 2.5-3km from the nearest primary school (Goytre Fawr Primary) and 15-20km from the nearest secondary school (King Henry VIII Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	*The site is within 800m of a health service or an active travel route.* The site is not within 800m of a health service; however, it is 3m from the nearest PRoW.
		++	*The site is within 800m of a formal leisure and green space.* The site is 500-600m from the nearest area of amenity importance and 0-50m from the nearest green space (play space).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Goetre Fawr 2 LSOA, which is amongst the 30-40% least deprived LSOA in Wales.

ISA topic	ISA objective	Significant effect?	Commentary
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 100-200m from the nearest bus stop (Halfway House) and 3m from the nearest PRoW. However, it is not within reasonable walking distance to a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 3m from the nearest waterbody (river).
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.
		--	*The site is within a mineral safeguarding area.* The site is within a mineral safeguarding area for sand and gravel.
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site is 26m from the nearest area of ancient woodland, 188m from the nearest priority habitat (traditional orchard), and 617m from the nearest SINC (Great Coedcae Du).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	-	*Development at the site has the potential for a negative effect on the historic environment.* The site is 150m from the nearest grade II listed building. The site is relatively small (2.2ha) and the nearest grade II listed building is located to the south of the site, on the other side of Little Mill, and is therefore unlikely to be impacted by development. However, there is another grade II listed building located to the northeast of the site, and therefore the site has the potential to impact the setting of this listed building.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	+	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park.*
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (Flood Zone 2 and 3).*
		-	*The site intersects with surface water Flood Zone 2 or 3.* Less than 50% of the site intersects with surface water Flood Zone 2 or 3. However, it is recognised that this is isolated to the western boundary of the site.

CS0103 – Land adjacent to Berthon Road

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	-	*The site has poor access to existing employment (>1,600m from an employment centre).*

ISA topic	ISA objective	Significant effect?	Commentary
			The site is 2-2.5km from the nearest protected employment site (Mamhilad).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	+	*The site has capacity to deliver new homes (<100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 65 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	--	*The site is >1,600m from a primary school and secondary school.* The site is 2-2.5km from the nearest primary school (Goytre Fawr Primary) and 10-15km from the nearest secondary school (King Henry VIII Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	*The site is within 800m of a health service or an active travel route.* The site is not within 800m of a health service; however, it is 60m from the nearest PRoW.
		++	*The site is within 800m of a formal leisure and green space.* The site is 0-50m from the nearest area of amenity importance and green space (play space and playing field).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Goetre Fawr 2 LSOA, which is amongst the 30-40% least deprived LSOA in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 200-300m from the nearest bus stop (Village Hall) and 60m from the nearest PRoW. However, it is not within reasonable

ISA topic	ISA objective	Significant effect?	Commentary
			walking distance to a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 16m from the nearest waterbody (river).
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.
		+	*The site does not intersect with a mineral safeguarding area.*
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.* The site is 189m from the nearest area of ancient woodland, 467m from the nearest priority habitat (traditional orchard), and 920m from the nearest SINC (Coed Di-haul North).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets.	?	*Development at the site would have an uncertain effect on the historic environment.* The site is 350m from the nearest grade II listed building.

ISA topic	ISA objective	Significant effect?	Commentary
	Promote understanding of Monmouthshire's cultural heritage.		The site is relatively small (2.4ha) and well screened by trees, and therefore it is unlikely to impact the setting of the nearest grade II listed building, which is located to the northeast of the site. Nevertheless, uncertainty is noted at this stage.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	+	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park.*
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	-	*The site intersects with fluvial Flood Zone 2 or 3.* Less than 50% of the site intersects with fluvial Flood Zone 2 or 3. However, it is recognised that this is isolated to the southeastern boundary of the site.
		+	*The site does not intersect with a high surface water flood risk area (Flood Zone 2 and 3).*

CS0016 – Land to the east of Little Mill

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	-	*The site has poor access to existing employment (>1,600m from an employment centre).* The site is 2.5-3km from the nearest protected employment site (Mamhilad).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	+	*The site has capacity to deliver new homes (<100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 30 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	--	*The site is >1,600m from a primary school and secondary school.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site is 2.5-3km from the nearest primary school (Goytre Fawr Primary) and 15-20km from the nearest secondary school (King Henry VIII Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	*The site is within 800m of a health service or an active travel route.* The site is not within 800m of a health service; however, it is 5m from the nearest PRoW.
		++	*The site is within 800m of a formal leisure and green space.* The site is 400-500m from the nearest area of amenity importance and 50-100m from the nearest green space (play space).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Goetre Fawr 2 LSOA, which is amongst the 30-40% least deprived LSOA in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 100-200m from the nearest bus stop (Halfway House) and 5m from the nearest PRoW. However, it is not within reasonable walking distance to a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 16m from the nearest waterbody (river).

ISA topic	ISA objective	Significant effect?	Commentary
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.
		--	*The site intersects with a mineral safeguarding area.* The site intersects with a mineral safeguarding area for sand and gravel.
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.* The site is 136m from the nearest area of ancient woodland, 51m from the nearest priority habitat (traditional orchard), and 330m from the nearest SINC (Great Coedcae Du).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	-	*Development at the site has the potential for a negative effect on the historic environment.* The site is 191m from the nearest grade II listed building. The site is relatively small (1.68ha); however, the nearest grade II listed building is located to the southwest of the site, on the other side of Little Mill, and is therefore unlikely to be impacted by development. However, there is another grade II listed building located to the northwest of the site, and therefore the site has the potential to impact the setting of this listed building.

ISA topic	ISA objective	Significant effect?	Commentary
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	+	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park.*
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (Flood Zone 2 and 3).*
		+	*The site does not intersect with a high surface water flood risk area (Flood Zone 2 and 3).*

CS0241 – Land north of Little Mill (Site A)

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	-	*The site has poor access to existing employment (>1,600m from an employment centre).* The site is 2-2.5km from the nearest protected employment site (Mamhilad).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	+	*The site has capacity to deliver new homes (<100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 15 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	--	*The site is >1,600m from a primary school and secondary school.* The site is 1,900-2,000m from the nearest primary school (Goytre Fawr Primary) and 10-15km from the nearest secondary school (King Henry VIII Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	*The site is within 800m of a health service or an active travel route.* The site is not within 800m of a health service; however, it is 3m from the nearest PRoW.

ISA topic	ISA objective	Significant effect?	Commentary
		++	*The site is within 800m of a formal leisure and green space.* The site is 200-300m from the nearest area of amenity importance and 0-50m from the nearest green space (play space).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Goetre Fawr 2 LSOA, which is amongst the 30-40% least deprived LSOA in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 200-300m from the nearest bus stop (Halfway House and Village Hall) and 3m from the nearest PRoW. However, it is not within reasonable walking distance to a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 6m from the nearest waterbody (river).
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).*

ISA topic	ISA objective	Significant effect?	Commentary
			The site is currently used for agriculture/ part SAH11(v).
		--	*The site is within a mineral safeguarding area.* The site is within a mineral safeguarding area for sand and gravel.
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.* The site is 172m from the nearest area of ancient woodland, 306m from the nearest priority habitat (traditional orchard), and 785m from the nearest SINC (Great Coedcae Du).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	-	*Development at the site has the potential for a negative effect on the historic environment.* The site is 208m from the nearest grade II listed building. The site is small (0.7ha) and the nearest grade II listed building is located to the southeast of the site, on the other side of Little Mill, and is therefore unlikely to be impacted by development. However, there is another grade II listed building located to the northeast of the site, and therefore the site has the potential to impact the setting of this listed building.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	+	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park.*
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (Flood Zone 2 and 3).*
		+	*The site does not intersect with a high surface water flood risk area (Flood Zone 2 and 3).*

CS0075 – Land north of Little Mill (Site B)

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	-	*The site has poor access to existing employment (>1,600m from an employment centre).* The site is 2-2.5km from the nearest protected employment site (Mamhilad).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	+	*The site has capacity to deliver new homes (<100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 44 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	--	*The site is >1,600m from a primary school and secondary school.* The site is 1,900-2,000m from the nearest primary school (Goytre Fawr Primary) and 10-15km from the nearest secondary school (King Henry VIII Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	*The site is within 800m of a health service or an active travel route.* The site is not within 800m of a health service; however, it is 1m from the nearest PRoW.
		++	*The site is within 800m of a formal leisure and green space.* The site is 200-300m from the nearest area of amenity importance and 0-50m from the nearest green space (play space).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Goetre Fawr 2 LSOA, which is amongst the 30-40% least deprived LSOA in Wales.

ISA topic	ISA objective	Significant effect?	Commentary
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 200-300m from the nearest bus stop (Halfway House and Village Hall) and 1m from the nearest PRoW. However, it is not within reasonable walking distance to a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 6m from the nearest waterbody (river).
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture/ part SAH11(v).
		--	*The site is within a mineral safeguarding area.* The site is within a mineral safeguarding area for sand and gravel.
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site is 74m from the nearest area of ancient woodland, 306m from the nearest priority habitat (traditional orchard), and 785m from the nearest SINC (Great Coedcae Du).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	-	*Development at the site has the potential for a negative effect on the historic environment.* The site is 208m from the nearest grade II listed building. The site is relatively small (1.5ha) and the nearest grade II listed building is located to the southeast of the site, on the other side of Little Mill, and is therefore unlikely to be impacted by development. However, there is another grade II listed building located to the northeast of the site, and therefore the site has the potential to impact the setting of this listed building.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	+	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park.*
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (Flood Zone 2 and 3).*
		-	*The site intersects with surface water Flood Zone 2 or 3.* Less than 50% of the site intersects with surface water Flood Zone 2 or 3.

CS0233 – Mulberry House, Berthon Road

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	-	*The site has poor access to existing employment (>1,600m from an employment centre).*

ISA topic	ISA objective	Significant effect?	Commentary
			The site is 2.5-3km from the nearest protected employment site (Mamhilad).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	+	*The site has capacity to deliver new homes (<100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 6 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	--	*The site is >1,600m from a primary school and secondary school.* The site is 2-2.5km from the nearest primary school (Goytre Fawr Primary) and 10-15km from the nearest secondary school (King Henry VIII Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	*The site is within 800m of a health service or an active travel route.* The site is not within 800m of a health service; however, it is 31m from the nearest PRoW.
		++	*The site is within 800m of a formal leisure and green space.* The site is 400-500m from the nearest area of amenity importance and 200-300m from the nearest green space (play space).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Goetre Fawr 2 LSOA, which is amongst the 30-40% least deprived LSOA in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 100-200m from the nearest bus stop (Halfway House) and 31m from the nearest PRoW. However, it is not within

ISA topic	ISA objective	Significant effect?	Commentary
			reasonable walking distance to a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 15m from the nearest waterbody (river).
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	?	*The site is predominantly greenfield land (≥50%) and contains low quality agricultural land (Grade 3b, 4, urban).* The site currently comprises residential curtilage/ grazing land.
		--	*The site is within a mineral safeguarding area.* The site is within a mineral safeguarding area for sand and gravel.
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.* The site is 275m from the nearest area of ancient woodland, 1m from the nearest priority habitat (traditional orchard), and 553m from the nearest SINC (Great Coedcae Du).

ISA topic	ISA objective	Significant effect?	Commentary
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	0	*Development at this site will have a neutral effect on the historic environment.* The site is 116m from the nearest grade II listed building. The site is very small (0.1ha) and the nearest grade II listed building, which is located to the west of the site, is shielded by existing development. Therefore, neutral effects are considered likely.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	+	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park.*
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	-	*The site intersects with fluvial Flood Zone 2 or 3.* Less than 50% of the site intersects with fluvial Flood Zone 2 or 3. However, it is recognised that this is isolated to the southern boundary of the site.
		+	*The site does not intersect with a high surface water flood risk area (Flood Zone 2 and 3).*

Grofield

Residential

CS0164 – Land adjacent to Red Barn Farm (RBF1)

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	+	*The site has good access to existing employment (≤800m from an employment centre).* The site is 400-500m from the nearest protected employment site (Union Road, Avergavenny).

ISA topic	ISA objective	Significant effect?	Commentary
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	+	*The site has capacity to deliver new homes (<100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 70 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	-	*The site is not within reasonable walking distance (≤800m) to a primary or a secondary school (≤1,600m).* The site is 800-900m from the nearest primary school (Cantref Primary) and 1,900-2,000m from the nearest secondary school (King Henry VIII Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	++	*The site is within 800m of a health service and an active travel route.* The site is 300-400m from the nearest hospital (Nevill Hall Hospital, Abergavenny), 700-800m from the nearest dentist (The Brecon Road Dental Surgery, Abergavenny), and 14m from the nearest PRoW.
		++	*The site is within 800m of a formal leisure and green space.* The site is 300-400m from the nearest area of amenity importance and green space (playing field).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	?	*The site falls within one of the 30-50% most deprived LSOAs in Wales.* The site falls within the Grofield LSOA, which is amongst the 40-50% most deprived LSOA in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 50-100m from the nearest bus stop (Nevill Hall Hospital) and 14m from the nearest PRoW. It is also 781m from the nearest

ISA topic	ISA objective	Significant effect?	Commentary
			National Cycle Network route. However, it is not within reasonable walking distance to a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 31m from the nearest waterbody (river).
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.
		--	*The site is within a mineral safeguarding area.* The site is within a mineral safeguarding area for sand and gravel.
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	-	*The site intersects or is adjacent to a regionally or locally (LNRs and SINCs) designated site and/ or priority habitats/ species.* The southeastern boundary of the site is adjacent to a SINC (Neville Hall Hospital). In addition, the site is 149m from the nearest area of ancient woodland, 217m from the nearest SAC and SSSI (River Usk/ Afon Wysg), and 379m from the nearest priority habitat (parkland).

ISA topic	ISA objective	Significant effect?	Commentary
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	--	*Development at the site has the potential for a significant negative effect on the historic environment.* The site is 29m from the nearest grade II listed building, 397m from the nearest conservation area (Abergavenny), 795m from the nearest scheduled monument (Avergavenny Bridge), 816m from the nearest grade II* listed building, 913m from the nearest archaeologically sensitive area, and 942m from the nearest World Heritage Site. The site is relatively small (2.1ha); however, considering how close it is to the nearest grade II listed building, which is located to the northwest of the site, it is likely to impact its setting.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	?	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park; however, the site is either adjacent to/ within close proximity to one of these designated landscapes, and/ or the scale of development proposed (≥ 100 dwellings) on greenfield land has the potential for a negative effect. This is uncertain at this stage.* The site is 5m from the nearest National Park (Brecon Beacons).
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	-	*The site intersects with fluvial Flood Zone 2 or 3.* Less than 50% of the site intersects with fluvial Flood Zone 2 or 3. However, it is recognised that this is isolated to the northwestern and southeastern corners of the site.
		+	*The site does not intersect with a high surface water flood risk area (Flood Zone 2 and 3).*

CS0249 – Land adjacent Red Barn Farm (RBF2)

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	+	*The site has good access to existing employment (≤800m from an employment centre).* The site is 420-300m from the nearest protected employment site (Union Road, Avergavenny).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	+	*The site has capacity to deliver new homes (<100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 55 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	-	*The site is not within reasonable walking distance (≤800m) to a primary or a secondary school (≤1,600m).* The site is 900-1,000m from the nearest primary school (Cantref Primary) and 2-2.5km from the nearest secondary school (King Henry VIII Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	++	*The site is within 800m of a health service and an active travel route.* The site is 100-200m from the nearest hospital (Nevill Hall Hospital, Abergavenny) and 91m from the nearest PRoW.
		++	*The site is within 800m of a formal leisure and green space.* The site is 500-600m from the nearest area of amenity importance and green space (play space).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	?	*The site falls within one of the 30-50% most deprived LSOAs in Wales.* The site falls within the Grofield LSOA, which is amongst the 40-50% most deprived LSOA in Wales.

ISA topic	ISA objective	Significant effect?	Commentary
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 50-100m from the nearest bus stop (Nevill Hall Hospital) and 91m from the nearest PRoW. It is also 586m from the nearest National Cycle Network route. However, it is not within reasonable walking distance to a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 95m from the nearest waterbody (river).
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.
		--	*The site is within a mineral safeguarding area.* The site is within a mineral safeguarding area for sand and gravel.
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	-	*The site intersects or is adjacent to a regionally or locally (LNRs and SINCs) designated site and/ or priority habitats/ species.*

ISA topic	ISA objective	Significant effect?	Commentary
			The eastern boundary of the site is adjacent to a SINC (Neville Hall Hospital). In addition, the site is 113m from the nearest SAC and SSSI (River Usk/ Afon Wysg), 182m from the nearest area of ancient woodland, and 195m from the nearest priority habitat (traditional orchard).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	-	*Development at the site has the potential for a negative effect on the historic environment.* The site is 108m from the nearest grade II listed building, 463m from the nearest conservation area (Abergavenny), 593m from the nearest scheduled monument (Avergavenny Bridge), 612m from the nearest grade II* listed building, 781m from the nearest World Heritage Site, and 922m from the nearest archaeologically sensitive area. The site is relatively small (2ha), and the nearest grade II listed building, which is located to the southeast of the site, is relatively well screened from the site by trees. Nevertheless, the site still has the potential to impact the setting of this listed building.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	-	*The site intersects with an Area of Outstanding Natural Beauty, National Park or Country Park.* The southwestern boundary of the site intersects with a National Park (Brecon Beacons).
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	-	*The site intersects with fluvial Flood Zone 2 or 3.* Less than 50% of the site intersects with fluvial Flood Zone 2 or 3. However, it is recognised that this is isolated to the eastern boundary of the site.
		-	*The site intersects with surface water Flood Zone 2 or 3.*

ISA topic	ISA objective	Significant effect?	Commentary
			Less than 50% of the site intersects with surface water Flood Zone 2 or 3. However, it is recognised that this is isolated to the eastern boundary of the site.

CS0268 – Westgate Gardens

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	0	*The site has reasonable access to existing employment (800-1,600m from an employment centre).* The site is 900-1,000m from the nearest identified industrial and business site (Westgate Business Park, Llanfoist).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	+	*The site has capacity to deliver new homes (<100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 6 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	+	*The site is within reasonable walking distance (≤800m) to a primary or a secondary school (≤1,600m).* The site is 700-800m from the nearest primary school (Cantref Primary); however, it is 1,600-1,700 from the nearest secondary school (King Henry VIII Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	++	*The site is within 800m of a health service and an active travel route.* The site is 0-50m from the nearest GP surgery (The Westgate Clinic, Abergavenny), 400-500m from the nearest dentist (The Brecon Road Dental Surgery, Abergavenny), and 60m from the nearest PRoW.
		++	*The site is within 800m of a formal leisure and green space.* The site is 0-50m from the nearest area of amenity importance and green space (public park or garden).

ISA topic	ISA objective	Significant effect?	Commentary
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	?	*The site falls within one of the 30-50% most deprived LSOAs in Wales.* The site falls within the Grofield LSOA, which is amongst the 40-50% most deprived LSOA in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	++	*The site is within close proximity (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, and an active travel route.* The site is 400-500m from the nearest bus stop (Brecon Road Surgery and Bridge Inn), 300-400m from the nearest central shopping area (Abergavenny), and 60m from the nearest PRoW. It is also 181m from the nearest National Cycle Network route.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 209m from the nearest waterbody (river).
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site comprises vacant scrub and vegetation.
		--	*The site is within a mineral safeguarding area.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site is within a mineral safeguarding area for sand and gravel.
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.* The site is 181m from the nearest SAC and SSSI (River Usk/ Afon Wysg), 288m from the nearest priority habitat (purple moor grass and rush pastures), 313m from the nearest area of ancient woodland, and 328m from the nearest SINC (Neville Hall Hospital).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	--	*Development at the site has the potential for a significant negative effect on the historic environment.* The site fully intersects with a conservation area (Abergavenny). In addition, the site is 25m from the nearest grade II listed building, 232m from the nearest scheduled monument (Abergavenny Bridge), 247m from the nearest grade II* listed building, 252m from the nearest archaeologically sensitive area, and 534m from the nearest grade I listed building. Whilst the site is very small (0.3ha), it will still likely impact the setting of the conservation area. It will also likely impact the setting of three nearby grade II listed buildings, which are all located to the northeast of the site.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	?	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park; however, the site is either adjacent to/ within close proximity to one of these designated landscapes, and/ or the scale of development proposed (≥ 100 dwellings) on greenfield land has the potential for a negative effect. This is uncertain at this stage.* The site is 691m from the nearest National Park (Brecon Beacons).

ISA topic	ISA objective	Significant effect?	Commentary
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	-	*The site intersects with fluvial Flood Zone 2 or 3.* Less than 50% of the site intersects with fluvial Flood Zone 2 or 3. However, it is recognised that this is isolated to the southern boundary of the site.
		+	*The site does not intersect with a high surface water flood risk area (Flood Zone 2 and 3).*

Mixed Use: Retail / Professional services / Food outlets (A1 / A2 / A3), Employment (B1 / B2 / B8), Health / leisure (D1 / D2) and Sui Generis

CS0178 – Abergavenny Workhouse

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	++	*New employment land proposed at the site.* The site is proposed for mixed-use development, including employment use (B1/B2/B8).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	0	*The site will deliver new employment land.*
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	0	*N/A*
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	0	*N/A*
		0	*N/A*
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	?	*The site falls within one of the 30-50% most deprived LSOAs in Wales.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site falls within the Grofield LSOA, which is amongst the 40-50% most deprived LSOA in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	0	*N/A*
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 352m from the nearest waterbody (river).
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	++	*The site is wholly brownfield land.*
		+	*The site does not intersect with a mineral safeguarding area.*
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.* The site is 50m from the nearest SINC (Neville Hall Hospital), 209m from the nearest priority habitat (traditional orchard), 220m from the nearest area of ancient woodland, and 315m from the nearest SAC and SSSI (River Usk/ Afon Wysg).

ISA topic	ISA objective	Significant effect?	Commentary
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	+	*Regeneration of brownfield land that is currently detracting from the historic environment.* The site contains a grade II listed building. In addition, the site is 1m from the nearest conservation area (Abergavenny), 309m from the nearest scheduled monument (Abergavenny Bridge), 332m from the nearest grade II* listed building, 401m from the nearest archaeologically sensitive area, and 847m from the nearest grade I listed building. The site is small (0.6ha), and whilst the impact of the site on the grade II listed building within the site, as well as the conservation area directly to the east of the site, will be dependent on the detailed design and layout of the site, it is recognised that it has the potential to improve the setting of these heritage assets.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	?	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park; however, the site is either adjacent to/ within close proximity to one of these designated landscapes, and/ or the scale of development proposed (≥ 100 dwellings) on greenfield land has the potential for a negative effect. This is uncertain at this stage.* The site is 386m from the nearest National Park (Brecon Beacons).
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (Flood Zone 2 and 3).*
		+	*The site does not intersect with a high surface water flood risk area (Flood Zone 2 and 3).*

Mixed Use: Retail / Professional services / Food outlets (A1 / A2 / A3), Employment (B1 / B2 / B8), Health / leisure (D1 / D2), Sui Generis and Residential (C3)

CS0286 – Abergavenny Workhouse

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	++	*New employment land proposed at the site.* The site is proposed for mixed-use development, including employment use (B1/B2/B8).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	?	*N/A* The number of new homes that will be delivered by this site is currently unknown.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	++	*The site is within reasonable walking distance (≤800m) to a primary and a secondary school (≤1,600m).* The site is 500-600m from the nearest primary school (Cantref Primary) and 1,400-1,500m from the nearest secondary school (King Henry VIII Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	++	*The site is within 800m of a health service and an active travel route.* The site is 300-400m from the nearest dentist (The Brecon Road Dental Surgery, Abergavenny) and GP surgery (The Westgate Clinic, Abergavenny), 400-500m from the nearest hospital (Nevill Hall Hospital, Abergavenny), and 157m from the nearest PRoW.
		++	*The site is within 800m of a formal leisure and green space.* The site is 0-50m from the nearest area of amenity importance and 50-100m from the nearest green space (play space).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	?	*The site falls within one of the 30-50% most deprived LSOAs in Wales.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site falls within the Grofield LSOA, which is amongst the 40-50% most deprived LSOA in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	++	*The site is within close proximity (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, and an active travel route.* The site is 200-300m from the nearest bus stop (Brecon Road Surgery), 400-500m from the nearest central shopping area (Abergavenny), and 157m from the nearest PRoW. It is also 276m from the nearest National Cycle Network route.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 352m from the nearest waterbody (river).
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	++	*The site is wholly brownfield land.*
		+	*The site does not intersect with a mineral safeguarding area.*
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site is 50m from the nearest SINC (Neville Hall Hospital), 209m from the nearest priority habitat (traditional orchard), 220m from the nearest area of ancient woodland, and 315m from the nearest SAC and SSSI (River Usk/ Afon Wysg).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	+	*Regeneration of brownfield land that is currently detracting from the historic environment.* The site contains a grade II listed building. In addition, the site is 1m from the nearest conservation area (Abergavenny), 309m from the nearest scheduled monument (Abergavenny Bridge), 332m from the nearest grade II* listed building, 401m from the nearest archaeologically sensitive area, and 847m from the nearest grade I listed building. The site is small (0.6ha), and whilst the impact of the site on the grade II listed building within the site, as well as the conservation area directly to the east of the site, will be dependent on the detailed design and layout of the site, it is recognised that it has the potential to improve the setting of these heritage assets.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	?	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park; however, the site is either adjacent to/ within close proximity to one of these designated landscapes, and/ or the scale of development proposed (≥ 100 dwellings) on greenfield land has the potential for a negative effect. This is uncertain at this stage.* The site is 386m from the nearest National Park (Brecon Beacons).
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (Flood Zone 2 and 3).*

ISA topic	ISA objective	Significant effect?	Commentary
		+	*The site does not intersect with a high surface water flood risk area (Flood Zone 2 and 3).*

Lansdown

Residential

CS0192 – Land off Old Hereford Road

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	0	*The site has reasonable access to existing employment (800-1,600m from an employment centre).* The site is 1,300-1,400m from the nearest identified industrial and business site (Ross Road, Abergavenny).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	+	*The site has capacity to deliver new homes (<100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 50 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	++	*The site is within reasonable walking distance (≤800m) to a primary and a secondary school (≤1,600m).* The site is 0-50m from the nearest primary school (Deri View Primary) and 600-700m from the nearest secondary school (King Henry VIII Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	*The site is within 800m of a health service or an active travel route.* The site is not within 800m of a health service; however, the northeastern boundary of the site is adjacent to a PRoW (352/23/1).

ISA topic	ISA objective	Significant effect?	Commentary
		++	*The site is within 800m of a formal leisure and green space.* The site is 0-50m from the nearest area of amenity importance and green space (play space).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	+	*The site falls within one of the 10% or 20% most deprived LSOAs in Wales.* The site falls within the Cantref 2 LSOA, which is amongst the 10-20% most deprived LSOA in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	++	*The site is within close proximity (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, and an active travel route.* The site is 0-50m from the nearest bus stop (Underhill Crescent), 200-300m from the nearest neighbourhood centre (Rother Avenue, Abergavenny), and adjacent to a PRoW (352/23/1). It is also 4m from the nearest National Cycle Network route.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 527m from the nearest waterbody (river).
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).*

ISA topic	ISA objective	Significant effect?	Commentary
	development and protecting, where possible, higher grade agricultural land.		The site is currently used for agriculture.
		+	*The site does not intersect with a mineral safeguarding area.*
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.* The site is 14m from the nearest SINC (land adjoining Old Hereford Road), 123m from the nearest area of ancient woodland, 188m from the nearest SAC and SSSI (Sugar Loaf Woodlands), and 265m from the nearest priority habitat (purple moor grass and rush pastures).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	-	*Development at the site has the potential for a negative effect on the historic environment.* The site is 96m from the nearest conservation area (Abergavenny), 442m from the nearest grade II listed building, 593m from the nearest archaeologically sensitive area, and 916m from the nearest grade II* listed building. The site is large (8.3), and due to its proximity to the conservation area, which is located to the southwest of the site, it has the potential to impact its setting.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	?	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park; however, the site is either adjacent to/ within close proximity to one of these designated landscapes, and/ or the scale of development proposed (≥ 100 dwellings) on greenfield land has the potential for a negative effect. This is uncertain at this stage.* The site is 2m from the nearest National Park (Brecon Beacons).

ISA topic	ISA objective	Significant effect?	Commentary
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (Flood Zone 2 and 3).*
		+	*The site does not intersect with a high surface water flood risk area (Flood Zone 2 and 3).*

CS0161 – Land north of Hillside

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	0	*The site has reasonable access to existing employment (800-1,600m from an employment centre).* The site is 1,400-1,500m from the nearest protected employment site (Hatherleigh Place, Abergavenny).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	+	*The site has capacity to deliver new homes (<100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 46-50 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	+	*The site is within reasonable walking distance (≤800m) to a primary and a secondary school (≤1,600m).* The site is 800-900m from the nearest primary school (Deri View Primary) and secondary school (King Henry VIII Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	*The site is within 800m of a health service or an active travel route.* The site is not within 800m of a health service; however, it is 169m from the nearest PRoW.
		++	*The site is within 800m of a formal leisure and green space.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site is 400-500m from the nearest area of amenity importance and 200-300m from the nearest green space (play space and other sports facility).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	+	*The site falls within one of the 10% or 20% most deprived LSOAs in Wales.* The site falls within the Cantref 2 LSOA, which is amongst the 10-20% most deprived LSOA in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	++	*The site is within close proximity (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, and an active travel route.* The site is 200-300m from the nearest bus stop (Underhill Crescent), 400-500m from the nearest neighbourhood centre (Rother Avenue, Abergavenny), and 169m from the nearest PRoW. It is also 327m from the nearest National Cycle Network route.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 316m from the nearest waterbody (river).
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site comprises woodland/ grassland.

ISA topic	ISA objective	Significant effect?	Commentary
		+	*The site does not intersect with a mineral safeguarding area.*
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	--	*The site intersects or is adjacent to an internationally (SAC, SPA, Ramsar) or nationally (SSSI, Ancient Woodland, NNRs) designated site.* The northwestern corner of the site intersects with an area of ancient woodland. In addition, the site is 163m from the nearest priority habitat (purple moor grass and rush pastures), 251m from the nearest SAC and SSSI (Sugar Loaf Woodlands), and 445m from the nearest SINC (land adjoining Old Hereford Road).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	--	*Development at the site has the potential for a significant negative effect on the historic environment.* The southwestern extent of the site intersects with a conservation area (Abergavenny) (33% overlap). In addition, the site is 230m from the nearest grade II listed building, 642m from the nearest archaeologically sensitive area, and 857m from the nearest grade II* listed building. The site is relatively large (3.1), and as it intersects with the conservation area, it is likely to impact its setting.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	?	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park; however, the site is either adjacent to/ within close proximity to one of these designated landscapes, and/ or the scale of development proposed (≥ 100 dwellings) on greenfield land has the potential for a negative effect. This is uncertain at this stage.* The site is 2m from the nearest National Park (Brecon Beacons).
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (Flood Zone 2 and 3).*

ISA topic	ISA objective	Significant effect?	Commentary
		+	*The site does not intersect with a high surface water flood risk area (Flood Zone 2 and 3).*

Llanbadoc

Residential

CS0105 – Land at Former Goods Yard

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	--	*Development at the site would result in the loss of existing employment land.* The site intersects with a protected employment site (Former Railway Goods Yard, Usk). It is also 600-700m from the nearest identified industrial and business site (South Woodside, Usk).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	+	*The site has capacity to deliver new homes (<100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 25 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	-	*The site is not within reasonable walking distance (≤800m) to a primary or a secondary school (≤1,600m).* The site is 1,200-1,300m from the nearest primary school (Usk Church in Wales Primary) and 15-20km from the nearest secondary school (King Henry VIII Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	*The site is within 800m of a health service or an active travel route.* The site is not within 800m of a health service; however, it is 59m from the nearest PRoW.

ISA topic	ISA objective	Significant effect?	Commentary
		++	*The site is within 800m of a formal leisure and green space.* The site is 0-50m from the nearest area of amenity importance and 100-200m from the nearest green space (playing field).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Llanbadoc LSOA, which is amongst the 20-30% least deprived LSOA in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	++	*The site is within close proximity (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, and an active travel route.* The site is 300-400m from the nearest bus stop (Woodside), 500-600m from the nearest central shopping area (Usk), and 59m from the nearest PRoW. It is also 248m from the nearest National Cycle Network route.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 99m from the nearest waterbody (river).
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	++	*The site is wholly brownfield land.* The site comprises a garage/ scrap yard.

ISA topic	ISA objective	Significant effect?	Commentary
		--	*The site is within a mineral safeguarding area.* The site is within a mineral safeguarding area for sand and gravel.
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.* The site is 67m from the nearest SAC and SSSI (River Usk/ Afon Wysg), 210m from the nearest area of ancient woodland, 222m from the nearest SINC (Graig Foel), and 266m from the nearest priority habitat (traditional orchard). It is recognised that the site is brownfield, and therefore, despite the above constraints, there could be potential to deliver net gains.
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	++	*Regeneration of brownfield land that is currently significantly detracting from the historic environment.* The site is 73m from the nearest conservation area (Usk), 119m from the nearest archaeologically sensitive area, 219m from the nearest scheduled monument (Graig Foel medieval ringwork), 272m from the nearest grade II listed building, 307m from the nearest grade II* listed building, and 414m from the nearest grade I listed building. The site is relatively small (0.9ha) and regeneration of the site has the opportunity to improve the setting of the aforementioned nearby heritage assets as the site comprises a garage/ scrap yard, which is currently significantly detracting from the historic environment. It is also recognised that the site is relatively well screened by trees.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	++	*The site is predominantly brownfield and does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park.*

ISA topic	ISA objective	Significant effect?	Commentary
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	--	*The site falls wholly within fluvial Flood Zone 2 or 3.* Over 50% of the site intersects with fluvial Flood Zone 2 or 3.
		-	*The site intersects with surface water Flood Zone 2 or 3.* Less than 50% of the site intersects with surface water Flood Zone 2 or 3. However, it is recognised that surface water flood risk is isolated to a small area in the southwestern corner of the site.

Llanfoist Fawr

Residential

CS0027 – Land adjacent to Llanellen Court Farm (north)

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	-	*The site has poor access to existing employment (>1,600m from an employment centre).* The site is 2-2.5km from the nearest protected employment site (Cranberry Foods, Abergavenny).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	+	*The site has capacity to deliver new homes (<100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 50 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	--	*The site is >1,600m from a primary school and secondary school.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site is 3-4km from the nearest primary school (Llanfoist Fawr Primary) and 5-6km from the nearest secondary school (King Henry VIII Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	*The site is within 800m of a health service or an active travel route.* The site is not within 800m of a health service; however, it is 1m from the nearest PRoW.
		++	*The site is within 800m of a formal leisure and green space.* The site is 200-300m from the nearest area of amenity importance and 50-100m from the nearest green space (religious grounds).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Castle and Llanfoist Fawr LSOA, which is amongst the 40-50% least deprived LSOA in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 100-200m from the nearest bus stop (Elm Drive and Post Office) and 1m from the nearest PRoW. It is also 290m from the nearest National Cycle Network route. However, it is not within reasonable walking distance to a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site is 304m from the nearest waterbody (river).
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.
		--	*The site is within a mineral safeguarding area.* The site is within a mineral safeguarding area for sand and gravel.
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	-	*The site intersects or is adjacent to a regionally or locally (LNRs and SINCs) designated site and/ or priority habitats/ species.* The southwestern boundary of the site is adjacent to a SINC (Llanellen Court). In addition, the site is 121m from the nearest priority habitat (traditional orchard), 292m from the nearest SAC and SSSI (River Usk/ Afon Wysg), and 446m from the nearest area of ancient woodland.
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	?	*Development at the site would have an uncertain effect on the historic environment.* The site is 156m from the nearest grade II listed building. The site is relatively small (1.56ha) and the nearest grade II listed building is well screened from the site by existing development. Nevertheless, uncertainty is noted at this stage as there are other nearby grade II listed buildings which could be impacted by the site.

ISA topic	ISA objective	Significant effect?	Commentary
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	?	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park; however, the site is either adjacent to/ within close proximity to one of these designated landscapes, and/ or the scale of development proposed (≥ 100 dwellings) on greenfield land has the potential for a negative effect. This is uncertain at this stage.* The site is 293m from the nearest National Park (Brecon Beacons).
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (Flood Zones 2 and 3).*
		-	*The site intersects with surface water Flood Zone 2 or 3.* Less than 50% of the site intersects with surface water Flood Zone 2 or 3. However, it is recognised that this is isolated to the eastern corner of the site.

S0247 – Coopers III (land east of James Jones Close)

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	+	*The site has good access to existing employment (≤800m from an employment centre).* The site is 400-500m from the nearest identified industrial and business site (Westgate Business Park, Llanfoist) and 600-700m from the nearest protected employment site (Union Road, Abergavenny).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	+	*The site has capacity to deliver new homes (<100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 50 new homes.

ISA topic	ISA objective	Significant effect?	Commentary
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	-	*The site is not within reasonable walking distance (≤800m) to a primary or a secondary school (≤1,600m).* The site is 1,000-1,100m from the nearest primary school (Llanfoist Fawr Primary) and 2-2.5km from the nearest secondary school (King Henry VIII Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	*The site is within 800m of a health service or an active travel route.* The site is not within 800m of a health service; however, it is 87m from the nearest PRoW.
		++	*The site is within 800m of a formal leisure and green space.* The site is 500-600m from the nearest area of amenity importance and 200-300m from the nearest green space (play space).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Castle and Llanfoist Fawr LSOA, which is amongst the 40-50% least deprived LSOA in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 200-300m from the nearest bus stop (Waitrose) and 87m from the nearest PRoW. It is also 92m from the nearest National Cycle Network route. However, it is not within reasonable walking distance to a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*

ISA topic	ISA objective	Significant effect?	Commentary
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 40m from the nearest waterbody (river).
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site comprises grassland.
		--	*The site is within a mineral safeguarding area.* The site is within a mineral safeguarding area for sand and gravel.
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.* The site is 3m from the nearest SAC and SSSI (River Usk/ Afon Wysg), 10m from the nearest area of ancient woodland, 207m from the nearest priority habitat (purple moor grass and rush pastures), and 369m from the nearest SINC (Waterloo Court).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	--	*Development at the site has the potential for a significant negative effect on the historic environment.* The northern boundary of the site is adjacent to a conservation area (Abergavenny). In addition, the site is 290m from the nearest grade II listed building, 334m from the nearest archaeologically sensitive area, 377m from the nearest scheduled monument (Abergavenny Castle), 428m from the nearest grade I listed building, 437m from the

ISA topic	ISA objective	Significant effect?	Commentary
			nearest grade II* listed building, and 716m from the nearest World Heritage Site (Blaenavon Industrial Landscape). The site is relatively large (3.4ha) and as it is adjacent to a conservation area, it is likely to impact its setting.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	?	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park; however, the site is either adjacent to/ within close proximity to one of these designated landscapes, and/ or the scale of development proposed (≥ 100 dwellings) on greenfield land has the potential for a negative effect. This is uncertain at this stage.* The site is 923m from the nearest National Park (Brecon Beacons).
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	-	*The site intersects with fluvial Flood Zone 2 or 3.* Less than 50% of the site is within fluvial Flood Zone 2 or 3. However, it is recognised that this is isolated to the southeastern extent of the site.
		-	*The site intersects with surface water Flood Zone 2 or 3.* Less than 50% of the site is within surface water Flood Zone 2 or 3. However, it is recognised that this is isolated to the southeastern extent of the site.

CS0250 – Land at Evesham Nurseries

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	+	*The site has good access to existing employment (≤800m from an employment centre).*

ISA topic	ISA objective	Significant effect?	Commentary
			The site is 500-600m from the nearest identified industrial and business site (Westgate Business Park, Llanfoist).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	++	*The site has capacity to deliver a significant number of new homes (≥ 100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 100 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	-	*The site is not within reasonable walking distance (≤800m) to a primary or a secondary school (≤1,600m).* The site is 1,100-1,200m from the nearest primary school (Llanfoist Fawr Primary) and 2.5-3km from the nearest secondary school (King Henry VIII Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	*The site is within 800m of a health service or an active travel route.* The site is not within 800m of a health service; however, it intersects with a PRoW (363/76/5).
		++	*The site is within 800m of a formal leisure and green space.* The site is 0-50m from the nearest area of amenity importance and green space (playing field).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Castle and Llanfoist Fawr LSOA, which is amongst the 40-50% least deprived LSOA in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site is 50-100m from the nearest bus stop (White House Lodge) and it intersects with a PRoW (363/76/5). It is also 7m from the nearest National Cycle Network route. However, it is not within reasonable walking distance to a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site intersects with a river.
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.
		--	*The site is within a mineral safeguarding area.* The site is within a mineral safeguarding area for sand and gravel.
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.* The site is 104m from the nearest area of ancient woodland, 144m from the nearest SINC (Waterloo Court), 160m from the nearest SSSI (Coed-y-Person), 201m from the nearest SAC (River Usk/ Afon

ISA topic	ISA objective	Significant effect?	Commentary
			Wysg), and 259m from the nearest priority habitat (lowland fens and reedbeds).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	--	*Development at the site has the potential for a significant negative effect on the historic environment.* The site is 17m from the nearest grade II listed building, 26m from the nearest World Heritage Site (Blaenavon Industrial Landscape), 100m from the nearest scheduled monument (St. Faith's Churchyard Cross, Llanfoist), 586m from the nearest conservation area (Abergavenny), and 654m from the nearest grade II* listed building. The site is large (6.4ha), and due to its proximity to several heritage assets, it is likely to impact their setting.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	-	*The site intersects with an Area of Outstanding Natural Beauty, National Park or Country Park.* The northwestern corner of the site intersects with a National Park (Brecon Beacons).
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (Flood Zones 2 and 3).*
		-	*The site intersects with surface water Flood Zone 2 or 3.* Less than 50% of the site is within surface water Flood Zone 2 or 3.

CS0215 – Land at Llanellen

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	-	*The site has poor access to existing employment (>1,600m from an employment centre).*

ISA topic	ISA objective	Significant effect?	Commentary
			The site is 2-2.5km from the nearest protected employment site (Cranberry Foods, Abergavenny).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	+	*The site has capacity to deliver new homes (<100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 45 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	--	*The site is >1,600m from a primary school and secondary school.* The site is 3-4km from the nearest primary school (Llanfoist Fawr Primary) and 5-6km from the nearest secondary school (King Henry VIII Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	*The site is within 800m of a health service or an active travel route.* The site is not within 800m of a health service; however, it is 27m from the nearest PRoW.
		++	*The site is within 800m of a formal leisure and green space.* The site is 200-300m from the nearest area of amenity importance and 50-100m from the nearest green space (religious grounds).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Castle and Llanfoist Fawr LSOA, which is amongst the 40-50% least deprived LSOA in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 50-100m from the nearest bus stop (Post Office) and 27m from the nearest PRoW. It is also 510m from the nearest National

ISA topic	ISA objective	Significant effect?	Commentary
			Cycle Network route. However, it is not within reasonable walking distance to a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 173m from the nearest waterbody (river).
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.
		--	*The site intersects with a mineral safeguarding area.* The site intersects with a mineral safeguarding area for sand and gravel.
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.* The site is 26m from the nearest priority habitat (traditional orchard), 144m from the nearest SAC (River Usk/ Afon Wysg), 149m from the nearest SSSI (River Usk/ Afon Wysg), 202m from the nearest SINC (Llanellen Court), and 666m from the nearest area of ancient woodland.

ISA topic	ISA objective	Significant effect?	Commentary
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	?	*Development at the site would have an uncertain effect on the historic environment.* The site is 97m from the nearest grade II listed building. The site is relatively small (1.5ha), and the nearest grade II listed building is well screened from the site by existing development. Nevertheless, uncertainty is noted at this stage as there are other grade II listed buildings nearby which could be impacted by the site.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	?	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park; however, the site is either adjacent to/ within close proximity to one of these designated landscapes, and/ or the scale of development proposed (≥ 100 dwellings) on greenfield land has the potential for a negative effect. This is uncertain at this stage.* The site is 514m from the nearest National Park (Brecon Beacons).
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (Flood Zones 2 and 3).*
		-	*The site intersects with surface water Flood Zone 2 or 3.* Less than 50% of the site is within surface water Flood Zone 2 or 3. However, it is recognised that this is isolated to an area in the southeastern corner of the site.

CS0263 – Land adjacent to Llanfoist Primary School (northern site)

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	+	*The site has good access to existing employment (≤800m from an employment centre).* The site is 100-200m from the nearest identified industrial and business site (Westgate Business Park, Llanfoist).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	+	*The site has capacity to deliver new homes (<100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 13 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	+	*The site is within reasonable walking distance (≤800m) to a primary or a secondary school (≤1,600m).* The site is 700-800m from the nearest primary school (Llanfoist Fawr Primary); however, it is 2.5-3km from the nearest secondary school (King Henry VIII Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	*The site is within 800m of a health service or an active travel route.* The site is not within 800m of a health service; however, it intersects with a PRoW (363/73/1).
		++	*The site is within 800m of a formal leisure and green space.* The site is 50-100m from the nearest area of amenity importance and 200-300m from the nearest green space (play space).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Castle and Llanfoist Fawr LSOA, which is amongst the 40-50% least deprived LSOA in Wales.

ISA topic	ISA objective	Significant effect?	Commentary
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 400-500m from the nearest bus stop (Briardene) and it intersects with a PRoW (363/73/1). It is also 427m from the nearest National Cycle Network route. However, it is not within reasonable walking distance to a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 151m from the nearest waterbody (lake).
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.
		--	*The site is within a mineral safeguarding area.* The site is within a mineral safeguarding area for sand and gravel.
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site is 46m from the nearest priority habitat (purple moor grass and rush pastures), 243m from the nearest SINC (Grove Farm), 464m from the nearest area of ancient woodland, 599m from the nearest SSSI (Coed-y-Person), and 608m from the nearest SAC (River Usk/ Afon Wysg).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	?	*Development at the site would have an uncertain effect on the historic environment.* The site is 197m from the nearest grade II* listed building, 366m from the nearest World Heritage Site (Blaenavon Industrial Landscape), 464m from the nearest grade II listed building, 580m from the nearest scheduled monument (St. Faith's Churchyard Cross, Llanfoist), 612m from the nearest conservation area (Abergavenny), and 989m from the nearest archaeologically sensitive area. The site is small (0.7ha) and the nearest grade II* listed building is screened from the site by existing development. Nevertheless, uncertainty is noted at this stage.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	?	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park; however, the site is either adjacent to/ within close proximity to one of these designated landscapes, and/ or the scale of development proposed (≥ 100 dwellings) on greenfield land has the potential for a negative effect. This is uncertain at this stage.* The site is 549m from the nearest National Park (Brecon Beacons).
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (Flood Zones 2 and 3).*
		-	*The site intersects with surface water Flood Zone 2 or 3.*

ISA topic	ISA objective	Significant effect?	Commentary
			Less than 50% of the site is within surface water Flood Zone 2 or 3.

CS0267 – Waterloo Court

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	+	*The site has good access to existing employment (≤800m from an employment centre).* The site is 400-500m from the nearest identified industrial and business site (Westgate Business Park, Llanfoist).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	+	*The site has capacity to deliver new homes (<100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 5 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	-	*The site is not within reasonable walking distance (≤800m) to a primary or a secondary school (≤1,600m).* The site is 900-1,000m from the nearest primary school (Llanfoist Fawr Primary) and 2.5-3km from the nearest secondary school (King Henry VIII Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	*The site is within 800m of a health service or an active travel route.* The site is not within 800m of a health service; however, it is 1m from a PRoW.
		++	*The site is within 800m of a formal leisure and green space.* The site is 200-300m from the nearest area of amenity importance and 300-400m from the nearest green space (playing field and religious grounds).

ISA topic	ISA objective	Significant effect?	Commentary
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Castle and Llanfoist Fawr LSOA, which is amongst the 40-50% least deprived LSOA in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 100-200m from the nearest bus stop (Llanfoist Inn) and 1m from a PRoW. It is also 4m from the nearest National Cycle Network route. However, it is not within reasonable walking distance to a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 198m from the nearest waterbody (river).
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	?	*The site is predominantly greenfield land (≥50%) and contains low quality agricultural land (Grade 3b, 4, urban).* The site is currently used for agriculture (and is part scrub).
		+	*The site does not intersect with a mineral safeguarding area.*
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	-	*The site intersects or is adjacent to a regionally or locally (LNRs and SINCs) designated site and/ or priority habitats/ species.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site intersects with a SINC (Waterloo Court) (88% overlap). In addition, the site is 25m from the nearest priority habitat (lowland fens and reedbeds), 360m from the nearest area of ancient woodland, and 368m from the nearest SAC and SSSI (River Usk/ Afon Wysg)
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	--	*Development at the site has the potential for a significant negative effect on the historic environment.* The site is 14m from the nearest grade II listed building, 266m from the nearest World Heritage Site (Blaenavon Industrial Landscape), 291m from the nearest scheduled monument (St. Faith's Churchyard Cross, Llanfoist), 448m from the nearest conservation area (Abergavenny), and 534m from the nearest grade II* listed building. The site is small (0.3ha); however, given the proximity of the nearest grade II listed building, the site is likely to impact its setting.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	?	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park; however, the site is either adjacent to/ within close proximity to one of these designated landscapes, and/ or the scale of development proposed (≥ 100 dwellings) on greenfield land has the potential for a negative effect. This is uncertain at this stage.* The northwestern corner of the site intersects with a National Park (Brecon Beacons).
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (Flood Zone 2 and 3).*
		+	*The site does not intersect with a high surface water flood risk area (Flood Zone 2 and 3).*

CS0284 – Pen Y Worlod Stables

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	0	*The site has reasonable access to existing employment (800-1,600m from an employment centre).* The site is 1,000-1,100m from the nearest identified industrial and business site (Westgate Business Park, Llanfoist).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	+	*The site has capacity to deliver new homes (<100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 5 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	-	*The site is not within reasonable walking distance (≤800m) to a primary or a secondary school (≤1,600m).* The site is 1,500-1,600m from the nearest primary school (Llanfoist Fawr Primary) and 3-4km from the nearest secondary school (King Henry VIII Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	*The site is within 800m of a health service or an active travel route.* The site is not within 800m of a health service; however, it intersects with four PRoWs (363/339/4, 363/339/3, 363/339/5 and 363/340/1) and a National Cycle Network route (Traffic Free).
		++	*The site is within 800m of a formal leisure and green space.* The site is 500-600m from the nearest area of amenity importance and green space (playing field and religious grounds).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Castle and Llanfoist Fawr LSOA, which is amongst the 40-50% least deprived LSOA in Wales.

ISA topic	ISA objective	Significant effect?	Commentary
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 0-50m from the nearest bus stop (White House Lodge) and it intersects with four PRoWs (363/339/4, 363/339/3, 363/339/5 and 363/340/1) and a National Cycle Network route (Traffic Free). However, it is not within reasonable walking distance to a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 190m from the nearest waterbody (river).
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	++	*The site is wholly brownfield land.* The site is currently used as a storage yard.
		--	*The site is within a mineral safeguarding area.* The site is within a mineral safeguarding area for sand and gravel.
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site is 169m from the nearest SAC and SSSI (River Usk/ Afon Wysg), 195m from the nearest area of ancient woodland, 232m from the nearest priority habitat (purple moor grass and rush pastures), and 388m from the nearest SINC (Waterloo Court).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	++	*Regeneration of brownfield land that is currently significantly detracting from the historic environment.* The site is 9m from the nearest World Heritage Site (Blaenavon Industrial Landscape), 224m from the nearest grade II listed building, 528m from the nearest scheduled monument (St. Faith's Churchyard Cross, Llanfoist), 715m from the nearest conservation area (Abergavenny), and 755m from the nearest grade II* listed building. The site is small (0.3ha); however, it is used as a storage yard which is likely currently significantly detracting from the historic environment. Therefore, development of the site has the potential to improve the setting of nearby heritage assets, particularly the World Heritage Site, which is located to the south of the site.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	-	*The site intersects with an Area of Outstanding Natural Beauty, National Park or Country Park.* The southwestern extent of the site intersects with a National Park (Brecon Beacons).
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (Flood Zone 2 and 3).*
		-	*The site intersects with surface water Flood Zone 2 or 3.* Less than 50% of the site is within surface water Flood Zone 2 or 3.

Residential Care

CS0269 – Land at Grove Farm

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	+	*The site has good access to existing employment (≤800m from an employment centre).* The site is 100-200m from the nearest identified industrial and business site (Westgate Business Park, Llanfoist).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	++	*The site has capacity to deliver a significant number of new homes (≥ 100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 210 new homes (residential care).
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	+	*The site is within reasonable walking distance (≤800m) to a primary or a secondary school (≤1,600m).* The site is 700-800m from the nearest primary school (Llanfoist Fawr Primary); however, it is 2.5-3km from the nearest secondary school (King Henry VIII Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	*The site is within 800m of a health service or an active travel route.* The site is not within 800m of a health service; however, it intersects with three PRoWs (363/73/1, 363/74/1 and 363/75/1).
		++	*The site is within 800m of a formal leisure and green space.* The site is 50-100m from the nearest area of amenity importance and 0-50m from the nearest green space (golf course).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site falls within the Castle and Llanfoist Fawr LSOA, which is amongst the 40-50% least deprived LSOA in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 200-300m from the nearest bus stop (Beech Grove) and it intersects with three PRoWs (363/73/1, 363/74/1 and 363/75/1). It is also 193m from the nearest National Cycle Network route. However, it is not within reasonable walking distance to a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site contains a lake and intersects with a river.
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.
		--	*The site is within a mineral safeguarding area.* The site is within a mineral safeguarding area for sand and gravel.

ISA topic	ISA objective	Significant effect?	Commentary
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	-	*The site intersects or is adjacent to a regionally or locally (LNRs and SINCs) designated site and/ or priority habitats/ species.* The southern extent of the site intersects with a SINC (Grove Farm) (44% overlap). The site also intersects with three priority habitats (lowland fens and reedbeds, purple moor grass and rush pastures, and traditional orchard). In addition, the site is 133m from the nearest area of ancient woodland, 348m from the nearest SSSI (Coed-y-Person), and 444m from the nearest SAC (River Usk/ Afon Wysg).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	--	*Development at the site has the potential for a significant negative effect on the historic environment.* The site contains a grade II* listed building. In addition, the site is 5m from the nearest World Heritage Site (Blaenavon Industrial Landscape), 248m from the nearest grade II listed building, 522m from the nearest scheduled monument (St. Faith's Churchyard Cross, Llanfoist), 613m from the nearest conservation area (Abergavenny), and 990m from the nearest archaeologically sensitive area. The site is large (13.2ha), and as it contains a grade II* listed building and is very close to the nearest World Heritage Site, it is likely to impact their setting.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	?	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park; however, the site is either adjacent to/ within close proximity to one of these designated landscapes, and/ or the scale of development proposed (≥ 100 dwellings) on greenfield land has the potential for a negative effect. This is uncertain at this stage.* The site is 190m from the nearest National Park (Brecon Beacons) and will deliver 210 homes (residential care) on agricultural land.

ISA topic	ISA objective	Significant effect?	Commentary
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	-	*The site intersects with fluvial Flood Zone 2 or 3.* Less than 50% of the site is within fluvial Flood Zone 2 or 3. Notably, fluvial flood risk is isolated to the southeastern part of the site.
		-	*The site intersects with surface water Flood Zone 2 or 3.* Less than 50% of the site is within surface water Flood Zone 2 or 3. Notably, surface water flood risk is isolated to the central northern part of the site.

Community use / Residential

CS0243 – Land north of the Village Hall

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	-	*The site has poor access to existing employment (>1,600m from an employment centre).* The site is 2-2.5km from the nearest protected employment site (Cranberry Foods, Abergavenny) and identified industrial and business site (Westgate Business Park, Llanfoist).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	+	*The site has capacity to deliver new homes (<100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 49 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	--	*The site is >1,600m from a primary school and secondary school.* The site is 2.5-3km from the nearest primary school (Llanfoist Fawr Primary) and 5-6km from the nearest secondary school (King Henry VIII Comprehensive).

ISA topic	ISA objective	Significant effect?	Commentary
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	*The site is within 800m of a health service or an active travel route.* The site is not within 800m of a health service; however, it is 12m from the nearest PRoW.
		++	*The site is within 800m of a formal leisure and green space.* The site is 100-200m from the nearest area of amenity importance and 0-50m from the nearest green space (playing field).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Castle and Llanfoist Fawr LSOA, which is amongst the 40-50% least deprived LSOA in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 50-100m from the nearest bus stop (Post Office) and 12m from the nearest PRoW. It is also 517m from the nearest National Cycle Network route. However, it is not within reasonable walking distance to a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 17m from the nearest waterbody (river).
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*

ISA topic	ISA objective	Significant effect?	Commentary
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently vacant greenfield land.
		--	*The site is within a mineral safeguarding area.* The site is within a mineral safeguarding area for sand and gravel.
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	--	*The site intersects or is adjacent to an internationally (SAC, SPA, Ramsar) or nationally (SSSI, Ancient Woodland, NNRs) designated site.* The northeastern boundary of the site is adjacent to a SAC and SSSI (River Usk/ Afon Wysg). In addition, the site is 146m from the nearest priority habitat (traditional orchard), 368m from the nearest SINC (Llanellen Court), and 701m from the nearest area of ancient woodland.
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	--	*Development at the site has the potential for a significant negative effect on the historic environment.* The site is 36m from the nearest grade II listed building. The site is relatively large (3.5ha) and in close proximity to the two nearest grade II listed building, which are both located on Llanellen Bridge to the east. Therefore, it is likely to impact their setting.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	?	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park; however, the site is either adjacent to/ within close proximity to one of these designated landscapes, and/ or the scale of development proposed (≥ 100 dwellings) on greenfield land has the potential for a negative effect. This is uncertain at this stage.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site is 518m from the nearest National Park (Brecon Beacons).
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	-	*The site intersects with fluvial Flood Zone 2 or 3.* Less than 50% of the site is within fluvial Flood Zone 2 or 3. However, it is recognised that this is isolated to the northeastern extent of the site.
		-	*The site intersects with surface water Flood Zone 2 or 3.* Less than 50% of the site is within surface water Flood Zone 2 or 3. However, it is recognised that this is isolated to the northeastern extent of the site.

Education

LCS0248 – Land adjacent to Llanfoist Fawr Primary School (whole site)

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	+	*The site has good access to existing employment (≤800m from an employment centre).* The site is 100-200m from the nearest identified industrial and business site (Westgate Business Park, Llanfoist).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	+	*The site has capacity to deliver new homes (<100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 33 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	+	*The site is within reasonable walking distance (≤800m) to a primary or a secondary school (≤1,600m).*

ISA topic	ISA objective	Significant effect?	Commentary
			The site is 700-800m from the nearest primary school (Llanfoist Fawr Primary); however, it is 2.5-3km from the nearest secondary school (King Henry VIII Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	*The site is within 800m of a health service or an active travel route.* The site is not within 800m of a health service; however, it intersects with three PRoWs (363/73/1, 363/74/1 and 363/75/1).
		++	*The site is within 800m of a formal leisure and green space.* The site is 50-100m from the nearest area of amenity importance and 200-300m from the nearest green space (golf course and play space).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Castle and Llanfoist Fawr LSOA, which is amongst the 40-50% least deprived LSOA in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 400-500m from the nearest bus stop (Briardene) and it intersects with three PRoWs (363/73/1, 363/74/1 and 363/75/1). It is also 427m from the nearest National Cycle Network route. However, it is not within reasonable walking distance to a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site is 56m from the nearest waterbody (lake).
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture (and is part scrub).
		--	*The site is within a mineral safeguarding area.* The site is within a mineral safeguarding area for sand and gravel.
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.* The site is 2m from the nearest priority habitat (traditional orchard), 127m from the nearest SINC (Grove Farm), 428m from the nearest area of ancient woodland, and 468m from the nearest SAC and SSSI (River Usk/ Afon Wysg).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	-	*Development at the site has the potential for a negative effect on the historic environment.* The site is 78m from the nearest grade II* listed building, 276m from the nearest World Heritage Site (Blaenavon Industrial Landscape), 464m from the nearest grade II listed building, 580m from the nearest scheduled monument (St. Faith's Churchyard Cross, Llanfoist), 612m from the nearest conservation area (Abergavenny), and 989m from the nearest archaeologically sensitive area.

ISA topic	ISA objective	Significant effect?	Commentary
			The site is relatively small (2ha); however, is still has the potential to impact the setting of the nearest grade II* listed building, which is located to the south of the site.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	?	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park; however, the site is either adjacent to/ within close proximity to one of these designated landscapes, and/ or the scale of development proposed (≥ 100 dwellings) on greenfield land has the potential for a negative effect. This is uncertain at this stage.* The site is 474m from the nearest National Park (Brecon Beacons).
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (Flood Zones 2 and 3).*
		-	*The site intersects with surface water Flood Zone 2 or 3.* Less than 50% of the site is within surface water Flood Zone 2 or 3.

Llangybi Fawr

Residential

CS0242 – Land north of New House

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	-	*The site has poor access to existing employment (>1,600m from an employment centre).*

ISA topic	ISA objective	Significant effect?	Commentary
			The site is 3-4km from the nearest protected employment site (Woodside Industrial Estate, Usk) and identified industrial and business site (South Woodside, Usk).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	+	*The site has capacity to deliver new homes (<100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 18 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	--	*The site is >1,600m from a primary school and secondary school.* The site is 4-5km from the nearest primary school (Usk Church in Wales Primary) and 15-20km from the nearest secondary school (Caldicot Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	*The site is within 800m of a health service or an active travel route.* The site is not within 800m of a health service; however, it intersects with a PRoW (366/44/1).
		++	*The site is within 800m of a formal leisure and green space.* The site is 400-500m from the nearest area of amenity importance and 100-200m from the nearest green space (religious grounds).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Llangybi Fawr LSOA, which is amongst the 20-30% least deprived LSOA in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 100-200m from the nearest bus stop (Tregrug and White Hart Inn) and it intersects with a PRoW (366/44/1). However, it is not

ISA topic	ISA objective	Significant effect?	Commentary
			within reasonable walking distance to a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 101m from the nearest waterbody (river).
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.
		--	*The site is within a mineral safeguarding area.* The site is within a mineral safeguarding area for sand and gravel.
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.* The site is 280m from the nearest priority habitat (traditional orchard), 420m from the nearest area of ancient woodland, and 559m from the nearest SINC (Whitehouse Farm Woods).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets.	--	*Development at the site has the potential for a significant negative effect on the historic environment.*

ISA topic	ISA objective	Significant effect?	Commentary
	Promote understanding of Monmouthshire's cultural heritage.		The site is 15m from the nearest grade II* listed building, 125m from the nearest grade II listed building, and 259m from the nearest scheduled monument (Ffynnon Cybi (St. Cybi's Well)). Whilst the site is relatively small (1.2ha), it is still likely to impact the setting of the nearest grade II* listed building, which is located to the south of the site.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	+	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park.*
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (Flood Zone 2 and 3).*
		+	*The site does not intersect with a high surface water flood risk area (Flood Zone 2 and 3).*

CS0019 – Land west of St Cybi Drive

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	-	*The site has poor access to existing employment (>1,600m from an employment centre).* The site is 4-5km from the nearest protected employment site (Woodside Industrial Estate, Usk) and identified industrial and business site (South Woodside, Usk).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	+	*The site has capacity to deliver new homes (<100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 20 new homes.

ISA topic	ISA objective	Significant effect?	Commentary
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	--	*The site is >1,600m from a primary school and secondary school.* The site is 5-6km from the nearest primary school (Usk Church in Wales Primary) and 15-20km from the nearest secondary school (Caldicot Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	*The site is within 800m of a health service or an active travel route.* The site is not within 800m of a health service; however, it is 119m from the nearest PRoW.
		++	*The site is within 800m of a formal leisure and green space.* The site is 200-300m from the nearest area of amenity importance and green space (play space, public park or garden, and allotments or community growing spaces).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Llangybi Fawr LSOA, which is amongst the 20-30% least deprived LSOA in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 400-500m from the nearest bus stop (White Hart Inn and Walnut Tree Cottage) and it is 119m from the nearest PRoW. However, it is not within reasonable walking distance to a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*

ISA topic	ISA objective	Significant effect?	Commentary
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 6m from the nearest waterbody (river).
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.
		--	*The site is within a mineral safeguarding area.* The site is within a mineral safeguarding area for sand and gravel.
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.* The site is 200m from the nearest SINC (Whitehouse Farm Woods), 254m from the nearest area of ancient woodland, and 371m from the nearest priority habitat (traditional orchard).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	0	*Development at this site will have a neutral effect on the historic environment.* The site is 292m from the nearest grade II listed building, 431m from the nearest grade II* listed building, and 516m from the nearest scheduled monument (Ffynnon Cybi (St. Cybi's Well)).

ISA topic	ISA objective	Significant effect?	Commentary
			The site is relatively small (1.1ha) and unlikely to impact the setting of the aforementioned heritage assets as they are relatively far from the site and screened by existing development.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	+	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park.*
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (Flood Zone 2 and 3).*
		+	*The site does not intersect with a high surface water flood risk area (Flood Zone 2 and 3).* Whilst the site is within Flood Zone 1, it is noted that the area directly to the south of the site is at risk of surface water flooding.

CS0020 – Land west of The Chase

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	-	*The site has poor access to existing employment (>1,600m from an employment centre).* The site is 4-5km from the nearest protected employment site (Woodside Industrial Estate, Usk) and identified industrial and business site (South Woodside, Usk).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	+	*The site has capacity to deliver new homes (<100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 20 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	--	*The site is >1,600m from a primary school and secondary school.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site is 5-6km from the nearest primary school (Usk Church in Wales Primary) and 15-20km from the nearest secondary school (Caldicot Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	*The site is within 800m of a health service or an active travel route.* The site is not within 800m of a health service; however, it is 136m from the nearest PRoW.
		++	*The site is within 800m of a formal leisure and green space.* The site is 300-400m from the nearest area of amenity importance and green space (public park or garden, play space, and allotments or community growing spaces).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Llangybi Fawr LSOA, which is amongst the 20-30% least deprived LSOA in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 400-500m from the nearest bus stop (White Hart Inn and Walnut Tree Cottage) and it is 136m from the nearest PRoW. However, it is not within reasonable walking distance to a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site is 6m from the nearest waterbody (river).
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.
		--	*The site is within a mineral safeguarding area.* The site is within a mineral safeguarding area for sand and gravel.
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.* The site is 49m from the nearest SINC (Whitehouse Farm Woods), 90m from the nearest area of ancient woodland, and 375m from the nearest priority habitat (traditional orchard).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	?	*Development at the site would have an uncertain effect on the historic environment.* The site is 260m from the nearest grade II listed building, 467m from the nearest grade II* listed building, and 533m from the nearest scheduled monument (Ffynnon Cybi (St. Cybi's Well)). The site is relatively small (1.2ha) and unlikely to impact the setting of the aforementioned heritage assets as they are relatively far from the site and primarily screened by existing development. However, uncertainty is noted as there is a grade II listed building located in the open countryside to the southeast of the site.

ISA topic	ISA objective	Significant effect?	Commentary
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	+	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park.*
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (Flood Zone 2 and 3).*
		+	*The site does not intersect with a high surface water flood risk area (Flood Zone 2 and 3).* Whilst the site is within Flood Zone 1, it is noted that the area directly to the north of the site is at risk of surface water flooding.

Llanover

Residential

LS0140 – Land south of Rhyd-y-Meirch

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	-	*The site has poor access to existing employment (>1,600m from an employment centre).* The site is 5-6km from the nearest protected employment site (Mamhilad and Cranberry Foods, Abergavenny) and identified industrial and business site (Westgate Business Park, Llanfoist).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	+	*The site has capacity to deliver new homes (<100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 32 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	--	*The site is >1,600m from a primary school and secondary school.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site is 3-4km from the nearest primary school (Goytre Fawr Primary) and 8-9km from the nearest secondary school (King Henry VIII Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	*The site is within 800m of a health service or an active travel route.* The site is not within 800m of a health service; however, it is adjacent to a PRoW.
		++	*The site is within 800m of a formal leisure and green space.* The site is 0-50m from the nearest area of amenity importance and green space (playing field).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	?	*The site falls within one of the 30-50% most deprived LSOAs in Wales.* The site falls within the Llanover 2 LSOA, which is amongst the 40-50% most deprived LSOA in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 100-200m from the nearest bus stop (Post Office) and it is adjacent to a PRoW. It is also 251m from the nearest National Cycle Network Route. However, it is not within reasonable walking distance to a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site is 20m from the nearest waterbody (river).
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site comprises vacant grassland.
		+	*The site does not intersect with a mineral safeguarding area.*
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.* The site is 2m from the nearest area of ancient woodland, 79m from the nearest priority habitat (lowland fens and reedbeds), and 878m from the nearest SINC (Wern Fawr South East Corner).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	--	*Development at the site has the potential for a significant negative effect on the historic environment.* The site almost wholly intersects with a conservation area (Llanover) (98% overlap). In addition, the site is 16m from the nearest grade II listed building. The site is relatively small (1.2ha); however, as it almost wholly intersects with a conservation area and is in proximity to several grade II listed buildings, it is likely to impact the setting of these heritage assets.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	?	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park; however, the site is either*

ISA topic	ISA objective	Significant effect?	Commentary
			adjacent to/ within close proximity to one of these designated landscapes, and/ or the scale of development proposed (≥ 100 dwellings) on greenfield land has the potential for a negative effect. This is uncertain at this stage. The site is 250m from the nearest National Park (Brecon Beacons).
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (Flood Zone 2 and 3).*
		+	*The site does not intersect with a high surface water flood risk area (Flood Zone 2 and 3).*

Employment (B1) (Including farm shop (A1))

CCS0139 – Land at former Petrol Station

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	++	*New employment land proposed at the site.* The site is proposed for employment use (B1 and farm shop (A1)).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	0	*The site will deliver new employment land.*
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	0	*N/A*
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	0	*N/A*
		0	*N/A*

ISA topic	ISA objective	Significant effect?	Commentary
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	?	*The site falls within one of the 30-50% most deprived LSOAs in Wales.* The site falls within the Llanover 2 LSOA, which is amongst the 40-50% most deprived LSOA in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	0	*N/A*
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 161m from the nearest waterbody (river).
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.
		+	*The site does not intersect with a mineral safeguarding area.*
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	-	*The site intersects or is adjacent to a regionally or locally (LNRs and SINCs) designated site and/ or priority habitats/ species.* The northwestern boundary of the site is adjacent to the nearest priority habitat (parkland). In addition, the site is 167m from the nearest area of ancient woodland.

ISA topic	ISA objective	Significant effect?	Commentary
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	--	*Development at the site has the potential for a significant negative effect on the historic environment.* The site wholly intersects with a conservation area (Llanover). In addition, the site is 3m from the nearest grade II listed building. The site is relatively large (2.2ha), and as it wholly intersects with a conservation area and is in proximity to several grade II listed buildings, it is likely to impact the setting of these heritage assets.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	?	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park; however, the site is either adjacent to/ within close proximity to one of these designated landscapes, and/ or the scale of development proposed (≥ 100 dwellings) on greenfield land has the potential for a negative effect. This is uncertain at this stage.* The site is 155m from the nearest National Park (Brecon Beacons).
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (Flood Zone 2 and 3).*
		-	*The site intersects with surface water Flood Zone 2 or 3.* Less than 50% of the site intersects with surface water Flood Zone 2 or 3. However, it is recognised that this is isolated to the southeastern part of the site.

Mixed Use: Residential (C3), Employment (B1), Retail (A1), Leisure, Education and Community Use (D1, D2)

CS0213 – Land east of A465

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	++	*New employment land proposed at the site.* The site is proposed for mixed-use development, including employment (B1) and retail (A1).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	++	*The site has capacity to deliver a significant number of new homes (≥ 100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 500 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	-	*The site is not within reasonable walking distance (≤800m) to a primary or a secondary school (≤1,600m).* The site is 1,500-1,600m from the nearest primary school (Our Lady and St Michaels RC Primary) and 2-2.5km from the nearest secondary school (King Henry VIII Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	++	*The site is within 800m of a health service and an active travel route.* The site is 400-500m from the nearest dentist (DW Dental Laboratories, Abergavenny) and it intersects with six PRoWs (368/212/1, 368/213/1, 368/215/1, 368/215/4, 368/216/1 and 368/221A/1).
		++	*The site is within 800m of a formal leisure and green space.* The site is 500-600m from the nearest area of amenity importance and green space (play space).

ISA topic	ISA objective	Significant effect?	Commentary
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	?	*The site falls within one of the 30-50% most deprived LSOAs in Wales.* The site falls within the Llanover 2 LSOA, which is amongst the 40-50% most deprived LSOA in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 400-500m from the nearest bus stop (Station) and it intersects with six PRoWs (368/212/1, 368/213/1, 368/215/1, 368/215/4, 368/216/1 and 368/221A/1). It is also 130m from the nearest National Cycle Network route. However, it is not within reasonable walking distance to a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site intersects with a river.
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.
		+	*The site does not intersect with a mineral safeguarding area.*

ISA topic	ISA objective	Significant effect?	Commentary
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	--	*The site intersects or is adjacent to an internationally (SAC, SPA, Ramsar) or nationally (SSSI, Ancient Woodland, NNRs) designated site.* The eastern extent of the site intersects with an area of ancient woodland (0.4% overlap). In addition, the site is 7m from the nearest priority habitat (traditional orchard), 340m from the nearest SINC (River Gavenni), and 588m from the nearest SAC and SSSI (River Usk/ Afon Wysg)
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	--	*Development at the site has the potential for a significant negative effect on the historic environment.* The site is 148m from the nearest conservation area (Avergavenny), 159m from the nearest grade II listed building, 360m from the nearest archaeologically sensitive area, 533m from the nearest scheduled monument (Area of Conventual Buildings, St Mary's Priory), 545m from the nearest grade I listed building, and 576m from the nearest grade II* listed building. The site is large (24.8ha), and given its proximity to the aforementioned heritage assets, it is likely to impact their setting. Development also has the potential to disturb archaeological remains. However, it is recognised that all of these heritage assets are located to the west of the site, on the other side of the A465 and within the existing built-up area of Abergavenny.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	+	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park.*
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (Flood Zone 2 and 3).*
		+	*The site does not intersect with a high surface water flood risk area (Flood Zone 2 and 3).*

Mardy

Residential

CS0094 – Land at Penlanlas Farm

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	0	*The site has reasonable access to existing employment (800-1,600m from an employment centre).* The site is 1,300-1,400m from the nearest identified industrial and business site (Ross Road, Abergavenny).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	++	*The site has capacity to deliver a significant number of new homes (≥ 100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 100 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	++	*The site is within reasonable walking distance (≤800m) to a primary and a secondary school (≤1,600m).* The site is 100-200m from the nearest primary school (Deri View Primary) and 800-900m from the nearest secondary school (King Henry VIII Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	*The site is within 800m of a health service or an active travel route.* The site is not within 800m of a health service; however, it intersects with a PRoW (370/91/5) and is adjacent to a National Cycle Network route.
		++	*The site is within 800m of a formal leisure and green space.* The site is 50-100m from the nearest area of amenity importance and 100-200m from the nearest green space (play space).

ISA topic	ISA objective	Significant effect?	Commentary
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	?	*The site falls within one of the 30-50% most deprived LSOAs in Wales.* The site falls within the Croesonen LSOA, which is amongst the 30-40% most deprived LSOA in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	++	*The site is within close proximity (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, and an active travel route.* The site is 100-200m from the nearest bus stop (Firs Road North and Thornbury), 400-500m from the nearest neighbourhood centre (The Mardy, Abergavenny and Rother Avenue, Abergavenny), and it intersects with a PRoW (370/91/5) and is adjacent to a National Cycle Network route.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 596m from the nearest waterbody (river).
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.
		+	*The site does not intersect with a mineral safeguarding area.*

ISA topic	ISA objective	Significant effect?	Commentary
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	-	*The site intersects or is adjacent to a regionally or locally (LNRs and SINCs) designated site and/ or priority habitats/ species.* The southern extent of the site intersects with a SINC (land adjoining Old Hereford Road) (38% overlap). In addition, the site is 80m from the nearest priority habitat (traditional orchard), 207m from the nearest area of ancient woodland, and 257m from the nearest SAC and SSSI (Sugar Loaf Woodlands).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	0	*Development at this site will have a neutral effect on the historic environment.* The site is 551m from the nearest grade II listed building, 592m from the nearest conservation area (Abergavenny), 746m from the nearest grade I listed building, and 756m from the nearest archaeologically sensitive area. The site is large (6.2); however, it is relatively far away from the nearest heritage assets, and relatively well screened by existing development. Therefore, neutral effects are anticipated.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	?	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park; however, the site is either adjacent to/ within close proximity to one of these designated landscapes, and/ or the scale of development proposed (≥ 100 dwellings) on greenfield land has the potential for a negative effect. This is uncertain at this stage.* The site is 36m from the nearest National Park (Brecon Beacons).
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (Flood Zone 2 and 3).*
		+	*The site does not intersect with a high surface water flood risk area (Flood Zone 2 and 3).*

CS0185 – Land to the west of Glebe Cottage

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	-	*The site has poor access to existing employment (>1,600m from an employment centre).* The site is 1,700-1,800m from the nearest identified industrial and business site (Ross Road, Abergavenny).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	+	The site has capacity to deliver new homes (<100 dwellings) and it does not intersect with a designated green wedge. The site has capacity to deliver 12 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	-	*The site is not within reasonable walking distance (≤800m) to a primary or a secondary school (≤1,600m).* The site is 800-900m from the nearest primary school (Ysgol Gymraeg Y Fenni and Llantilo Pertholey Church in Wales) and 2-2.5km from the nearest secondary school (King Henry VIII Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	++	*The site is within 800m of a health service and an active travel route.* The site is 500-600m from the nearest hospital (Ty Gwyn Hall Nursing Home, Abergavenny) and 2m from the nearest National Cycle Network route and 80m from the nearest PRoW.
		++	*The site is within 800m of a formal leisure and green space.* The site is 500-600m from the nearest area of amenity importance and 0-50m from the nearest green space (religious grounds).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Mardy 2 LSOA, which is amongst the 30-40% least deprived LSOA in Wales.

ISA topic	ISA objective	Significant effect?	Commentary
Transport and movement	Increase sustainable transport use and reduce the need to travel.	++	*The site is within close proximity (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, and an active travel route.* The site is 0-50m from the nearest bus stop (St Teilo's Church), 500-600m from the nearest neighbourhood centre (The Mardy, Abergavenny), and 2m from the nearest National Cycle Network route and 80m from the nearest PRoW.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The eastern boundary of the site is adjacent to a river (Gavenny).
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site comprises grazing land.
		+	*The site does not intersect with a mineral safeguarding area.*
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	-	*The site intersects or is adjacent to a regionally or locally (LNRs and SINCs) designated site and/ or priority habitats/ species.* The eastern boundary of the site intersects with a SINC (River Gavenni) (17% overlap). In addition, the site is 7m from the nearest priority habitat (purple moor grass and rush pastures), 389m from the

ISA topic	ISA objective	Significant effect?	Commentary
			nearest area of ancient woodland, and 500m from the nearest SSSI (Cwm Mill Section, Mardy)
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	-	*Development at the site has the potential for a negative effect on the historic environment.* The site is 22m from the nearest grade II listed building and 56m from the nearest grade I listed building. The site is small (1.1) and well screened by trees to the east. However, it is in close proximity to two grade II and one grade I listed building, which are located to the east of the site. Therefore, it has the potential to impact the setting of these listed buildings.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	?	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park; however, the site is either adjacent to/ within close proximity to one of these designated landscapes, and/ or the scale of development proposed (≥ 100 dwellings) on greenfield land has the potential for a negative effect. This is uncertain at this stage.* The site is 84m from the nearest National Park (Brecon Beacons).
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	-	*The site intersects with fluvial Flood Zone 2 or 3.* Less than 50% of the site intersects with fluvial Flood Zone 2 or 3. However, it is recognised that this is isolated to the eastern boundary of the site.
		+	*The site does not intersect with a high surface water flood risk area (Flood Zone 2 and 3).*

CS0108 – Land north of Hillgrove Avenue

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	-	*The site has poor access to existing employment (>1,600m from an employment centre).* The site is 1,900-2,000m from the nearest identified industrial and business site (Ross Road, Abergavenny).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	+	The site has capacity to deliver new homes (<100 dwellings) and it does not intersect with a designated green wedge. The site has capacity to deliver 50 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	+	*The site is within reasonable walking distance (≤800m) to a primary or a secondary school (≤1,600m).* The site is 50-100m from the nearest primary school (Llantilo Pertholey Church in Wales); however, it is 1,600-1,700m from the nearest secondary school (King Henry VIII Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	++	*The site is within 800m of a health service and an active travel route.* The site is 500-600m from the nearest hospital (Ty Gwyn Hall Nursing Home, Abergavenny) and 3m from the nearest National Cycle Network route and PRoW.
		++	*The site is within 800m of a formal leisure and green space.* The site is 0-50m from the nearest area of amenity importance and 500-600m from the nearest green space (play space and religious grounds).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	?	*The site falls within one of the 30-50% most deprived LSOAs in Wales.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site falls within the Mardy 2 and Croesonen LSOAs, which are amongst the 30-40% least deprived and 30-40% most deprived LSOAs in Wales respectively.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	++	*The site is within close proximity (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, and an active travel route.* The site is 200-300m from the nearest bus stop (Poplars Close), 700-800m from the nearest neighbourhood centre (The Mardy, Abergavenny), and 3m from the nearest National Cycle Network route and PRoW.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 455m from the nearest waterbody (river).
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.
		+	*The site does not intersect with a mineral safeguarding area.*
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site is 144m from the nearest priority habitat (traditional orchard), 325m from the nearest area of ancient woodland, 402m from the nearest SINC (River Gavenni), and 450m from the nearest SAC and SSSI (Sugar Loaf Woodlands).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	0	*Development at this site will have a neutral effect on the historic environment.* The site is 288m from the nearest grade II listed building and 514m from the nearest grade I listed building. The site is relatively large (2.9); however, the nearest listed buildings are screened from the site by existing development. Therefore, neutral effects are anticipated.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	?	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park; however, the site is either adjacent to/ within close proximity to one of these designated landscapes, and/ or the scale of development proposed (≥ 100 dwellings) on greenfield land has the potential for a negative effect. This is uncertain at this stage.* The site is 5m from the nearest National Park (Brecon Beacons).
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (Flood Zone 2 and 3).*
		+	*The site does not intersect with a high surface water flood risk area (Flood Zone 2 and 3).*

CS0264 – Land north of St Teilos

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	-	*The site has poor access to existing employment (>1,600m from an employment centre).* The site is 1,800-1,900m from the nearest identified industrial and business site (Ross Road, Abergavenny).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	+	The site has capacity to deliver new homes (<100 dwellings) and it does not intersect with a designated green wedge. The site has capacity to deliver 6 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	-	*The site is not within reasonable walking distance (≤800m) to a primary or a secondary school (≤1,600m).* The site is 900-1,000m from the nearest primary school (Ysgol Gymraeg Y Fenni and Llantilo Pertholey Church in Wales) and 2-2.5km from the nearest secondary school (King Henry VIII Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	++	*The site is within 800m of a health service and an active travel route.* The site is 500-600m from the nearest hospital (Ty Gwyn Hall Nursing Home, Abergavenny) and it intersects with four PRoWs (370/119/1, 370/119/2, 370/127/1 and 370/127/2) and one National Cycle Network route (On Road).
		++	*The site is within 800m of a formal leisure and green space.* The site is 600-700m from the nearest area of amenity importance and 0-50m from the nearest green space (religious grounds).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site falls within the Mardy 2 LSOA, which is amongst the 30-40% least deprived LSOA in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	++	*The site is within close proximity (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, and an active travel route.* The site is 0-50m from the nearest bus stop (St Teilo's Church), 600-700m from the nearest neighbourhood centre (The Mardy, Abergavenny), and it intersects with four PRoWs (370/119/1, 370/119/2, 370/127/1 and 370/127/2) and one National Cycle Network route (On Road).
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site intersects with a river (Gavenny).
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.
		+	*The site does not intersect with a mineral safeguarding area.*
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	-	*The site intersects or is adjacent to a regionally or locally (LNRs and SINCs) designated site and/ or priority habitats/ species.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site intersects with a SINC (River Gavenni) (72% overlap) and a priority habitat (purple moor grass and rush pastures) (37% overlap). In addition, the site is 314m from the nearest area of ancient woodland, 700m from the nearest SSSI (Cwm Mill Section, Mardy), and 990m from the nearest SAC (Sugar Loaf Woodlands).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	-	*Development at the site has the potential for a negative effect on the historic environment.* The site is 24m from the nearest grade II listed building and 57m from the nearest grade I listed building. The site is small (0.8) and partially screened by trees. However, it is in close proximity to two grade II and one grade I listed building, which are located to the south of the site. Therefore, it has the potential to impact the setting of these listed buildings.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	-	*The site intersects with an Area of Outstanding Natural Beauty, National Park or Country Park.* The northeastern corner of the site intersects with a National Park (Brecon Beacons).
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	-	*The site intersects with fluvial Flood Zone 2 or 3.* Less than 50% of the site intersects with fluvial Flood Zone 2 or 3. This is in the middle of the site.
		-	*The site intersects with surface water Flood Zone 2 or 3.* Less than 50% of the site intersects with surface water Flood Zone 2 or 3. This is in the middle of the site.

Employment (B1 / B2)

CS0266 – Land at Nantgavenny Business Park

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	++	*New employment land proposed at the site.* The site is proposed for employment use (B1/ B2).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	0	*The site will deliver new employment land.*
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	0	*N/A*
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	0	*N/A*
		0	*N/A*
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Mardy 2 LSOA, which is amongst the 30-40% least deprived LSOA in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	0	*N/A*
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site is 7m from the nearest waterbody (river).
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.
		+	*The site does not intersect with a mineral safeguarding area.*
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	--	*The site intersects or is adjacent to an internationally (SAC, SPA, Ramsar) or nationally (SSSI, Ancient Woodland, NNRs) designated site.* The eastern boundary of the site intersects with a SINC (River Gavenni) (3% overlap). The eastern boundary of the site is also adjacent to an area of ancient woodland. In addition, the site is 69m from the nearest priority habitat (traditional orchard) and 87m from the nearest SSSI (Cwm Mill Section, Mardy).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	0	*Development at this site will have a neutral effect on the historic environment.* The site is 596m from the nearest grade II listed building, 615m from the nearest grade I listed building, 805m from the nearest archaeologically sensitive area, and 957m from the nearest conservation area (Abergavenny). The site is small (0.6ha) and relatively far away from the aforementioned heritage assets. It is also well screened by existing development. Therefore, neutral effects are anticipated.

ISA topic	ISA objective	Significant effect?	Commentary
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	?	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park; however, the site is either adjacent to/ within close proximity to one of these designated landscapes, and/ or the scale of development proposed (≥ 100 dwellings) on greenfield land has the potential for a negative effect. This is uncertain at this stage.* The site is 497m from the nearest National Park (Brecon Beacons).
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	-	*The site intersects with fluvial Flood Zone 2 or 3.* Less than 50% of the site intersects with fluvial Flood Zone 2 or 3. However, it is recognised that this is isolated to the northeastern corner of the site.
		+	*The site does not intersect with a high surface water flood risk area (Flood Zones 2 and 3).*

Tourism / Leisure

S0265 – Tredilion Park

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	++	*New employment land proposed at the site.* The site is proposed for tourism/ leisure.
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	0	*The site will deliver new employment land.*
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	0	*N/A*

ISA topic	ISA objective	Significant effect?	Commentary
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	0	*N/A*
		0	*N/A*
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	?	*The site falls within one of the 30-50% most deprived LSOAs in Wales.* The site falls within the Mardy 2 and Llanover 2 LSOAs, which are amongst the 30-40% least deprived and 40-50% most deprived LSOA in Wales respectively.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	0	*N/A*
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 684m from the nearest waterbody (river) and the eastern boundary of the site falls within the River Wye Catchment Area.
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site comprises a parklands estate.
		+	*The site does not intersect with a mineral safeguarding area.*

ISA topic	ISA objective	Significant effect?	Commentary
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	--	*The site intersects or is adjacent to an internationally (SAC, SPA, Ramsar) or nationally (SSSI, Ancient Woodland, NNRs) designated site.* The central and southern parts of the site intersect with two areas of ancient woodland. In addition, the northern part of the site intersects with a priority habitat (parkland). The site is 618m from the nearest SINC (Maindiff Court Hospital) and 984m from the nearest SSSI (Cwm Mill Section, Mardy).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	-	*Development at the site has the potential for a negative effect on the historic environment.* The site is 491m from the nearest grade II listed building, 612m from the nearest grade II* listed building, 677m from the nearest conservation area (Abergavenny), and 714m from the nearest archaeologically sensitive area. The site is large (31.6ha), and whilst it is relatively far away from the aforementioned heritage assets, due to its size it still has the potential to impact the setting of these heritage assets.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	?	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park; however, the site is either adjacent to/ within close proximity to one of these designated landscapes, and/ or the scale of development proposed (≥ 100 dwellings) on greenfield land has the potential for a negative effect. This is uncertain at this stage.* The site is 785m from the nearest National Park (Brecon Beacons).
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (Flood Zones 2 and 3).*
		-	*The site intersects with Flood Zone 2 or 3.*

ISA topic	ISA objective	Significant effect?	Commentary
			Less than 50% of the site intersects with surface water Flood Zone 2 or 3. However, it is recognised that this is isolated to four small areas within the site.

Mill

Residential and Residential Care Facility (C2)

CS0206 – Land south of Newport Road

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	+	*The site has good access to existing employment (≤800m from an employment centre).* The site is 0-50m from the nearest protected employment site (Magor Brewery) and 200-300m from the nearest identified industrial and business site (Quay Point, Magor).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	++	*The site has capacity to deliver a significant number of new homes (≥ 100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 150 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	+	*The site is within reasonable walking distance (≤800m) to a primary or a secondary school (≤1,600m).* The site is 700-800m from the nearest primary school (Magor Church in Wales Primary); however, it is 6-7km from the nearest secondary school (Caldicot Comprehensive).

ISA topic	ISA objective	Significant effect?	Commentary
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	++	*The site is within 800m of a health service and an active travel route.* The site is 700-800m from the nearest dentist (Teeth for Life, Magor Surgery and Tintern House Dental Surgery, all in Magor) and GP surgery (Dudley Taylor Pharmacies) and adjacent to a PRoW.
		++	*The site is within 800m of a formal leisure and green space.* The site is 0-50m from the nearest area of amenity importance and green space (allotments or community growing spaces).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Mill 1 LSOA, which is amongst the 10-20% least deprived LSOAs in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	++	*The site is within close proximity (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, and an active travel route.* The site is 100-200m from the nearest bus stop (Queen's Gardens), 500-600m from the nearest central shopping area (Magor), and adjacent to a PRoW.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 404m from the nearest waterbody (river).
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*

ISA topic	ISA objective	Significant effect?	Commentary
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.
		--	*The site intersects with a mineral safeguarding area.* The site intersects with a mineral safeguarding area for carboniferous limestone, and sand and gravel.
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.* The site is 192m from the nearest SSSI (Gwent Levels – Redwick and Llandevenny), 222m from the nearest SINC (Bluehouse Farm), and 232m from the nearest priority habitat (purple moor grass and rush pastures).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	--	*Development at the site has the potential for a significant negative effect on the historic environment.* The southern extent of the site intersects with an archaeologically sensitive area (45% overlap). In addition, the site is 59m from the nearest grade II listed building, 309m from the nearest conservation area (Magor), 517m from the nearest scheduled monument (Medieval building adjoining Magor Churchyard), 522m from the nearest grade II* listed building, and 577m from the nearest grade I listed building. The site is large (12ha) and likely to disturb archaeological remains on-site. It is also likely to impact the setting of the nearest grade II listed building, which is located to the north of the site.

ISA topic	ISA objective	Significant effect?	Commentary
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	+	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park.*
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (Flood Zone 2 and 3).*
		+	*The site does not intersect with a high surface water flood risk area (Flood Zone 2 and 3).*

Employment

CS0252 – Gwent Europark

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	++	*New employment land proposed at the site.* The site is proposed for employment uses (B1 / B2 / B8)
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	0	*The site will deliver new employment land.*
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	0	*N/A*
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	0	*N/A*
		0	*N/A*
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* Not classified as deprived or relatively deprived (3rd quintile).

ISA topic	ISA objective	Significant effect?	Commentary
Transport and movement	Increase sustainable transport use and reduce the need to travel.	0	*N/A*
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*This site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* This site is intersected by a river.
		+	*This site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*This site does not intersect with a Nitrate Vulnerability Zone (NVZ)*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	?	*The site is predominantly greenfield land (≥50%) and contains low quality agricultural land (Grade 3b, 4, urban).* This site is classed as Grade 3b or 5.
		+	*The site does not intersect with a mineral safeguarding area.*
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	--	*The site intersects or is adjacent to an internationally (SAC, SPA, Ramsar) or nationally (SSSI, Ancient Woodland, NNRs) designated site.* This site overlaps with the Gwent Levels – Redwick and Llandevenny SSSI. It is also 321m from the nearest SINC (Upper Cottage Pond), and 799m from the nearest area of ancient woodland.
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets.	-	*Development at the site has the potential for a negative effect on the historic environment.*

ISA topic	ISA objective	Significant effect?	Commentary
	Promote understanding of Monmouthshire's cultural heritage.		The site almost wholly intersects with an archaeologically sensitive area (98.31% overlap). In addition, the site is 792m from the nearest scheduled monument (Wilcrick Hill Camp), 1,456m from the nearest grade II listed buildings, 1,437m from the nearest conservation area (Magor), 1,635m from the nearest grade II* building, and 1,674m from the nearest grade I listed building. The site almost wholly intersects with an archaeologically sensitive area (98% overlap). In addition, the site is 184m from the nearest scheduled monument (Wilcrick Hill Camp), 522m from the nearest grade II listed building, 680m from the nearest conservation area (Magor), 892m from the nearest grade II* listed building, and 945m from the nearest grade I listed building. Development is likely to disturb on-site archaeological remains.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	+	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park.*
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (Flood Zone 2 and 3).*
		-	*The site intersects with surface water Flood Zone 2 or 3.* Less than 50% of the site intersects with surface water Flood Zone 2 or 3.

Employment (B2 / B8)

CS0258 – Quay Point (land south of Magor Brewery)

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	++	*New employment land proposed at the site.* The site is proposed for employment use (B2/ B8).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	0	*The site will deliver new employment land.*
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	0	*N/A*
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	0	*N/A*
		0	*N/A*
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* Not classified as deprived or relatively deprived (3rd quintile). The site falls within the Mill 2 LSOA, which is amongst the 10-20% least deprived LSOAs in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	0	*N/A*
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 404m from the nearest waterbody (river).

ISA topic	ISA objective	Significant effect?	Commentary
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	-	*The site is predominantly greenfield land (>50%) and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture and storage.
		--	*The site intersects with a mineral safeguarding area.* The site intersects with a mineral safeguarding area for sand and gravel.
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	-	T*he site intersects or is adjacent to a regionally or locally (LNRs and SINCs) designated site and/ or priority habitats/ species.* The site contains a small priority habitat (traditional orchard). In addition, the site is 53m from the nearest SSSI (Gwent Levels – Redwick and Llandevenny), 139m from the nearest SINC (Upper Cottage Pond), and 543m from the nearest area of ancient woodland.
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	--	*Development at the site has the potential for a significant negative effect on the historic environment.* The site almost wholly intersects with an archaeologically sensitive area (98% overlap). In addition, the site is 184m from the nearest scheduled monument (Wilcrick Hill Camp), 522m from the nearest grade II listed building, 680m from the nearest conservation area (Magor), 892m from the nearest grade II* listed building, and 945m from the nearest grade I listed building.

ISA topic	ISA objective	Significant effect?	Commentary
			The site is large (14ha) and development is likely to disturb a large area of on-site archaeological remains, as well as other nearby archaeological remains (scheduled monument).
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	+	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park.*
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (Flood Zone 2 and 3).*
		-	*The site intersects with surface water Flood Zone 2 or 3.* Less than 50% of the site intersects with surface water Flood Zone 2 or 3. However, it is recognised that this is isolated to a few small areas near the boundaries of the site.

Employment (B1 / B2 / B8)

CS0228 – Land off Green Moor Lane

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	++	*New employment land proposed at the site.* The site is proposed for employment use (B1/ B2/ B8).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	0	*The site will deliver new employment land.*
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	0	*N/A*
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	0	*N/A*

ISA topic	ISA objective	Significant effect?	Commentary
		0	*N/A*
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Mill 2 LSOA, which is amongst the 10-20% least deprived LSOAs in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	0	*N/A*
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 413m from the nearest waterbody (river).
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.
		--	*The site is within a mineral safeguarding area.* The site is within a mineral safeguarding area for sand and gravel.
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site is 34m from the nearest priority habitat (traditional orchard), 53m from the nearest SSSI (Gwent Levels – Redwick and Llandevenny), 265m from the nearest SINC (land at Barecroft Common), and 872m from the nearest area of ancient woodland.
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	--	*Development at the site has the potential for a significant negative effect on the historic environment.* The site wholly intersects with an archaeologically sensitive area. In addition, the site is 561m from the nearest scheduled monument (Wilcrick Hill Camp), 707m from the nearest grade II listed building, 733m from the nearest conservation area (Magor), 932m from the nearest grade II* listed building, and 980m from the nearest grade I listed building. The site is relatively large (3.2ha) and development is likely to disturb a large area of on-site archaeological remains.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	+	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park.*
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (Flood Zones 2 and 3).*
		-	*The site intersects with surface water Flood Zone 2 or 3.* Less than 50% of the site intersects with surface water Flood Zone 2 or 3. However, it is recognised that this is isolated to the northwestern corner of the site.

Commercial (B1 / B2 / B8 Uses)

CS0038 – Land to the west of Wales One Business Park

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	++	*New employment land proposed at the site.* The site is proposed for commercial use (B1/ B2/ B8).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	0	*The site will deliver new employment land.*
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	0	*N/A*
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	0	*N/A*
		0	*N/A*
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Mill 2 LSOA, which is amongst the 10-20% least deprived LSOAs in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	0	*N/A*
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 611m from the nearest waterbody (river).

ISA topic	ISA objective	Significant effect?	Commentary
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.
		--	*The site is within a mineral safeguarding area.* The site is within a mineral safeguarding area for carboniferous limestone.
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.* The site is 320m from the nearest priority habitat (traditional orchard), 745m from the nearest SINC (Grange Road), 767m from the nearest area of ancient woodland, and 934m from the nearest SSSI (Gwent Levels – Redwick and Llandevenny).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	-	*Development at the site has the potential for a negative effect on the historic environment.* The site is 231m from the nearest scheduled monument (Wilcrick Hill Camp), 445m from the nearest grade II listed building, 488m from the nearest archaeologically sensitive area, and 981m from the nearest conservation area (Magor). The site is relatively large (3.8ha) and development has the potential to disturb nearby archaeological remains.

ISA topic	ISA objective	Significant effect?	Commentary
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	+	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park.*
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (Flood Zones 2 and 3).*
		-	*The site intersects with surface water Flood Zone 2 or 3.* Less than 50% of the site intersects with surface water Flood Zone 2 or 3. However, it is recognised that this is isolated to the southeastern corner of the site.

Overmonnow

Residential

GS0151 – Former Troy Rail Yard

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	0	*The site has reasonable access to existing employment (800-1,600m from an employment centre).* The site is 1,000-1,100m from the nearest protected employment site (Mayhill/ Hadnock Road, Monmouth).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	+	*The site has capacity to deliver new homes (<100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 26 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	-	*The site is not within reasonable walking distance (≤800m) to a primary or a secondary school (≤1,600m).*

ISA topic	ISA objective	Significant effect?	Commentary
			The site is 1,400-1,500m from the nearest primary school (Overmonnow Primary) and 1,700-1,800m from the nearest secondary school (Monmouth Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	++	*The site is within 800m of a health service and an active travel route.* The site is 600-700m from the nearest GP surgery (Monnow Eyecare, Monmouth) and 19m from the nearest National Cycle Network route.
		++	*The site is within 800m of a formal leisure and green space.* The site is 400-500m from the nearest area of amenity importance and 0-50m from the nearest green space (play space). It is also 751m from the nearest National Trail.
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	0	*The site falls within one of the 20-30% most deprived LSOAs in Wales.* The site falls within the Overmonnow 2 LSOA, which is amongst the 20-30% most deprived LSOAs in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	++	*The site is within close proximity (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, and an active travel route.* The site is 0-50m from the nearest bus stop (Beach Road), 500-600m from the nearest neighbourhood centre (The Albion, Monmouth) and 700-800m from the nearest central shopping area (Monmouth), and 19m from the nearest National Cycle Network route and 146m from the nearest PRoW.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*

ISA topic	ISA objective	Significant effect?	Commentary
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 194m from the nearest waterbody (river) and falls wholly within the River Wye Catchment Area.
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	?	*The site is predominantly brownfield land (>50%) and contains high quality agricultural land (Grade 1, 2 and 3a).* The site comprises a former rail yard.
		--	*The site is within a mineral safeguarding area.* The site is within a mineral safeguarding area for sand and gravel.
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	-	*The site intersects or is adjacent to a regionally or locally (LNRs and SINCs) designated site and/ or priority habitats/ species.* The site almost wholly intersects with a SINC (Troy Station) (94% overlap). In addition, the site is 152m from the nearest area of ancient woodland, 181m from the nearest priority habitat (traditional orchard), and 226m from the nearest SAC and SSSI (River Wye/ Afon Gwy).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	+	*Regeneration of brownfield land that is currently detracting from the historic environment.* The site wholly intersects with a registered historic landscape (The Lower Wye Valley). In addition, the site is 162m from the nearest grade II listed building, 207m from the nearest archaeologically sensitive area, 225m from the nearest conservation area (Monmouth

ISA topic	ISA objective	Significant effect?	Commentary
			(central)), 412m from the nearest scheduled monument (Clawdd Du), 425m from the nearest grade II* listed building, and 756m from the nearest grade I listed building. The site is relatively small (1.1ha), and whilst it intersects with a registered historic landscape, it has the potential to improve the setting of this landscape by regenerating the former rail yard into a new residential development. However, it is recognised that this will depend on the detailed design and layout of the site.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	?	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park; however, the site is either adjacent to/ within close proximity to one of these designated landscapes, and/ or the scale of development proposed (≥ 100 dwellings) on greenfield land has the potential for a negative effect. This is uncertain at this stage.* The southeastern boundary of the site is adjacent to an AONB (Wye Valley).
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	-	The site intersects with fluvial Flood Zone 2 or 3. Less than 50% of the site intersects with fluvial Flood Zone 2 or 3. However, it is recognised that fluvial flood risk is isolated to the northeastern extent of the site.
		-	The site intersects with surface water Flood Zone 2 or 3. Less than 50% of the site intersects with surface water Flood Zone 2 or 3. However, it is recognised that surface water flood risk is isolated to three small areas within the site.

Portskewett

Mixed Use: Residential (C3), Employment (B1 / B2 / B8), Retail (A1), Leisure (D1, Sui Generis)

CS0251 – Land at Bradbury Farm Crick

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	++	*New employment land proposed at the site.* The site is proposed for mixed-use, including employment use (B1/ B2/ B8), retail (A1) and leisure (D1, sui generis).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	++	*The site has capacity to deliver a significant number of new homes (≥ 100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 960 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	-	*The site is not within reasonable walking distance (≤800m) to a primary or a secondary school (≤1,600m).* The site is 900-1,000m from the nearest primary school (Archbishop Rowan Williams VA Primary) and 2-2.5km from the nearest secondary school (Caldicot Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	*The site is within 800m of a health service or an active travel route.* The site is not within 800m of a health service; however, it intersects with a PRoW (376/4/1).
		++	*The site is within 800m of a formal leisure and green space.* The site is 400-500m from the nearest area of amenity importance and green space (public park or garden).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site falls within the Portskewett LSOA, which is amongst the 10-20% least deprived LSOAs in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 100-200m from the nearest bus stop (Kilcrow Hill) and it intersects with a PRoW (376/4/1). It is also 197m from the nearest National Cycle Network route. However, it is not within reasonable walking distance to a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 370m from the nearest waterbody (river).
		-	*The site intersects with a Groundwater Source Protection Zone (SPZ).* The site falls within SPZ 3.
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.
		--	*The site is within a mineral safeguarding area.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site is within a mineral safeguarding area for carboniferous limestone, and sand and gravel.
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	--	*The site intersects or is adjacent to an internationally (SAC, SPA, Ramsar) or nationally (SSSI, Ancient Woodland, NNRs) designated site.* The central and northwestern parts of the site intersect with several areas of ancient woodland, as well as a SINC (Ballan Wood) (10% overlap). In addition, the site is 193m from the nearest SSSI (Nedern Brook Wetlands, Caldicot) and 837m from the nearest priority habitat (wood pasture).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	--	*Development at the site has the potential for a significant negative effect on the historic environment.* The site is 47m from the nearest grade II listed building, 107m from the nearest grade II* listed building, 113m from the nearest scheduled monument (Crick Medieval House), 156m from the nearest archaeologically sensitive area, 333m from the nearest conservation area (Caldicot), and 734m from the nearest grade I listed building. The site is very large (56ha), and therefore it will likely impact the setting of the aforementioned heritage assets, especially those closest to the site. Development also has the potential to disturb nearby archaeological remains.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	?	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park; however, the site is either adjacent to/ within close proximity to one of these designated landscapes, and/ or the scale of development proposed (≥ 100 dwellings) on greenfield land has the potential for a negative effect. This is uncertain at this stage.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site is 379m from the nearest County Park (Gwastadeddau Gwent/ Gwent Levels). In addition, the site will deliver 960 homes on land currently used for agriculture.
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (Flood Zones 2 and 3).*
		-	*The site intersects with surface water Flood Zone 2 or 3.* Less than 50% of the site intersects with surface water Flood Zone 2 or 3. However, it is recognised that this is isolated to a few small areas primarily in the centre of the site.

Employment

Oak Grove Farm

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	++	*New employment land proposed at the site.* The site is proposed for employment use (B1/ B2/ B8).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	0	*The site will deliver new employment land.*
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	0	N/A
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	0	*N/A*
		0	*N/A*

ISA topic	ISA objective	Significant effect?	Commentary
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Portskewett LSOA, which is amongst the 10-20% least deprived LSOAs in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	0	*N/A*
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	0	*The site does not contain and is not in close proximity to a waterbody, nor does it fall within the River Wye Catchment Area.*
		-	*The site intersects with a Groundwater Source Protection Zone (SPZ).* The site intersects with Source Protection Zone 3.
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).*
		--	*The site is within a mineral safeguarding area.* The site is within a mineral safeguarding area for carboniferous limestone.
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site is 1,104m from the nearest priority habitat (lowland meadows), 58m from the nearest area of ancient woodland, 2,172m from the nearest SAC, SPA and Ramsar, 907m from the nearest SSSI (Nedern Brook Wetlands, Caldicot), and 61m from the nearest SINC (Sunny Bank).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	?	*Development at the site has the potential for a significant negative effect on the historic environment.* The site is 530m from the nearest grade II listed building, 477m from the nearest grade II* listed building, 478m from the nearest scheduled monument (Crick Moated Site), 834m from the nearest archaeologically sensitive area, 1,159m from the nearest conservation area (Caldicot), and 1,690m from the nearest grade I listed building. Though the site is a distance from important historic environment features, it is possible development will impact upon the heritage value of the area.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	+	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park.*
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (Flood Zones 2 and 3).*
		-	*The site intersects with surface water Flood Zone 2 or 3.* Less than 50% of the site intersects with surface water Flood Zone 2 or 3. However, it is recognised that this is isolated to a few small areas primarily in the centre of the site.

Gypsy and Traveller site

Bradbury Farm, Crick

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	-	*The site has poor access to existing employment (>1,600m from an employment centre).* The site is 2-2.5km from the nearest industrial and business site (Pill Row, Severnbridge Industrial Estate) and 1500-1600m from the nearest protected employment site (Severn Bridge, Caldicot).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	?	*N/A.*
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	--	*The site is >1,600m from a primary school and secondary school.* The nearest primary school is Archbishop Rowan Williams VA Primary School (2-2.5km away), and the nearest secondary school is Caldicot Comprehensive (2.5-3km away).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	*The site is within 800m of a health service or an active travel route.* The site is 203m from the nearest public right of way, but 2-2.5km from nearest dentist, 2-2.5km to the nearest GP surgery, and >25km from the nearest hospital.
		-	*The site is not within 800m of a formal leisure or green space.* The site is between 1,500-1,600m of public park or garden.
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* This site is not classified as deprived or relatively deprived, and is in the 5th quintile.

ISA topic	ISA objective	Significant effect?	Commentary
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 3-4km walking distance from the nearest neighbourhood centre. It is also 400-500m from the nearest bus stop and 3-4km from the nearest train station.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	0	*The site does not contain and is not in close proximity to a waterbody, nor does it fall within the River Wye Catchment Area.*
		-	*The site intersects with a Groundwater Source Protection Zone (SPZ).* The site is within Source Protection Zone 3.
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).*
		--	*The site is within a mineral safeguarding area.* The site is within a mineral safeguarding area for carboniferous limestone and sand and gravel
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site is 1,200m from the nearest priority habitat (lowland meadows), 75m from the nearest area of ancient woodland, 2,378m from the nearest SAC, SPA and Ramsar, 301m from the nearest SSSI (Nedern Brook Wetlands, Caldicot), and 71m from the nearest SINC (Sunny Bank).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	0	*Development at this site will have a neutral effect on the historic environment.* The site is 258m from the nearest grade II listed building, 291m from the nearest grade II* listed building, 673m from the nearest conservation area (Caldicot), and 224m from the nearest scheduled monument (The Berries Mound Bailey Castle). Given the distance of the site from important historic environment features, it is unlikely development will impact upon the heritage value of the area.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	+	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park.*
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (flood zone 2 and 3).*
		+	*The site does not intersect with a high surface water flood risk area (flood zone 2 and 3).*

Portskewett / Shirenewton

Renewable Energy (Solar)

CS0066 – Bridge View Farm

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	0	*N/A* The site is proposed for renewable energy (solar).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	0	*N/A*
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	0	*N/A*
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	0	*N/A*
		0	*N/A*
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Portskewett and Shirennewton LSOAs, which are amongst the 10-20% least deprived LSOAs in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	0	*N/A*
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site is 232m from the nearest waterbody (lake) and falls wholly within the River Wye Catchment Area.
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.
		--	*The site is within a mineral safeguarding area.* The site is within a mineral safeguarding area for carboniferous limestone, and sand and gravel.
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.* The site is 19m from the nearest priority habitat (traditional orchard), 108m from the nearest area of ancient woodland, 440m from the nearest SAC, SPA and SSSI (Severn Estuary), and 775m from the nearest SINC (Withey Bed).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	--	*Development at the site has the potential for a significant negative effect on the historic environment.* The site wholly intersects with an archaeologically sensitive area. In addition, the site is 143m from the nearest grade II listed building, 492m from the nearest grade II* listed building, 741m from the nearest conservation area (Mathern), and 865m from the nearest scheduled monument (Moated site south of Moynes Court).

ISA topic	ISA objective	Significant effect?	Commentary
			The site is large (16ha), and whilst the installation of solar panels is less likely to disturb archaeological remains when compared to housing development, some disturbance is still likely to take place. In addition, the site has the potential to impact the setting of the three nearest grade II listed building, which are located in a row to the west of the site.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	+	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park.*
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (Flood Zones 2 and 3).*
		-	*The site intersects with surface water Flood Zone 2 or 3.* Less than 50% of the site intersects with surface water Flood Zone 2 or 3. However, it is recognised that this is isolated to a few small areas in the western extent of the site and is unlikely to cause significant issues due to the use of this site (renewable energy).

Raglan

Residential

CS0183 – Land south of Monmouth Road

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	+	*The site has good access to existing employment (≤800m from an employment centre).* The site is 700-800m from the nearest protected employment site (Raglan Enterprise Park).

ISA topic	ISA objective	Significant effect?	Commentary
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	+	*The site has capacity to deliver new homes (<100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 85 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	+	*The site is within reasonable walking distance (≤800m) to a primary or a secondary school (≤1,600m).* The site is 400-500m from the nearest primary school (Raglan VC Primary); however, it is 10-15km from the nearest secondary school (Monmouth Coprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	++	*The site is within 800m of a health service and an active travel route.* The site is 400-500m from the nearest GP surgery (Castle Gate Medical Practice, Raglan) and intersects with a PRoW (377/58/1).
		++	*The site is within 800m of a formal leisure and green space.* The site is 0-50m from the nearest area of amenity importance and green space (cemetery and playing field).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Raglan LSOA, which is amongst the 20-30% least deprived LSOAs in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	++	*The site is within close proximity (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, and an active travel route.* The site is 50-100m from the nearest bus stop (Castle Turn), 200-300m from the nearest central shopping area (Raglan) and intersects with a PRoW (377/58/1). It is also 3m from the nearest National Cycle Network route.

ISA topic	ISA objective	Significant effect?	Commentary
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 65m from the nearest waterbody (river).
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		-	*The site intersects with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site comprises grassland.
		+	*The site does not intersect with a mineral safeguarding area.*
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.* The site is 358m from the nearest area of ancient woodland and 487m from the nearest priority habitat (traditional orchard).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	--	*Development at the site has the potential for a significant negative effect on the historic environment.* The northwestern boundary of the site is adjacent to a conservation area (Raglan). In addition, the site is 61m from the nearest archaeologically sensitive area, 164m from the nearest scheduled monument (Raglan Churchyard Cross), 165m from the nearest grade II listed building, 168m from the nearest grade II* listed building, and 564m from the nearest grade I listed building.

ISA topic	ISA objective	Significant effect?	Commentary
			The site is large (4.5ha) and likely to impact the setting of the adjacent conservation area. Development also has the potential to disturb nearby archaeological remains.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	+	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park.*
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (Flood Zones 2 and 3).*
		-	*The site intersects with surface water Flood Zone 2 or 3.* Less than 50% of the site intersects with surface water Flood Zone 2 or 3. However, it is recognised that this is largely isolated to the southern corner of the site.

CS0205 – Land at Usk Road, Raglan

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	0	*The site has reasonable access to existing employment (800-1,600m from an employment centre).* The site is 900-1,000m from the nearest protected employment site (Raglan Enterprise Park).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	+	*The site has capacity to deliver new homes (<100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 50 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	+	*The site is within reasonable walking distance (≤800m) to a primary or a secondary school (≤1,600m).*

ISA topic	ISA objective	Significant effect?	Commentary
			The site is 700-800m from the nearest primary school (Raglan VC Primary); however, it is 10-15km from the nearest secondary school (Monmouth Coprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	++	*The site is within 800m of a health service and an active travel route.* The site is 700-800m from the nearest GP surgery (Castle Gate Medical Practice, Raglan) and 4m from the nearest National Cycle Network route.
		++	*The site is within 800m of a formal leisure and green space.* The site is 100-200m from the nearest area of amenity importance and green space (play space).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Raglan LSOA, which is amongst the 20-30% least deprived LSOAs in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	++	*The site is within close proximity (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, and an active travel route.* The site is 0-50m from the nearest bus stop (Cayo Cottage and Wilcae Birdge), 300-400m from the nearest central shopping area (Raglan) and 4m from the nearest National Cycle Network route. It is also 56m from the nearest PRoW.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.*

ISA topic	ISA objective	Significant effect?	Commentary
			The southern boundary of the site intersects with a river (Nant y Wilcae).
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		-	*The site intersects with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.
		+	*The site does not intersect with a mineral safeguarding area.*
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.* The site is 228m from the nearest area of ancient woodland, 358m from the nearest priority habitat (traditional orchard), and 624m from the nearest SINC (Broom House Meadows).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	?	*Development at the site would have an uncertain effect on the historic environment.* The site is 220m from the nearest conservation area, 320m from the nearest archaeologically sensitive area, 325m from the nearest grade II listed building, 502m from the nearest scheduled monument (Raglan Churchyard Cross), 517m from the nearest grade II* listed building, and 796m from the nearest grade I listed building. The site is relatively large (4.4ha); however, the aforementioned heritage assets are relatively far from the site and screened by existing development. Nevertheless, uncertainty is noted at this stage.

ISA topic	ISA objective	Significant effect?	Commentary
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	+	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park.*
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	-	*The site intersects with fluvial Flood Zone 2 or 3.* Less than 50% of the site intersects with fluvial Flood Zone 2 or 3. However, it is recognised that this is isolated to the southern extent of the site.
		+	*The site does not intersect with a high surface water flood risk area (Flood Zones 2 and 3).*

Employment (B1) and Renewable Energy (Solar)

CCS0069 – Raglan Enterprise Park

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	++	*New employment land proposed at the site.* The site is proposed for mixed-use, including employment use (B1) and renewable energy (solar).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	0	*The site will deliver new employment land.*
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	0	*N/A*
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	0	*N/A*
		0	*N/A*
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site falls within the Raglan LSOA, which is amongst the 20-30% least deprived LSOAs in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	0	*N/A*
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The northeastern corner of the site is adjacent to a river (Nant y Wilcae).
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		-	*The site intersects with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.
		+	*The site does not intersect with a mineral safeguarding area.*
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	--	*The site intersects or is adjacent to an internationally (SAC, SPA, Ramsar) or nationally (SSSI, Ancient Woodland, NNRs) designated site.* The northeastern boundary of the site is adjacent to an area of ancient woodland. In addition, the site is 311m from the nearest priority habitat (traditional orchard) and 560m from the nearest SINC (Broom House Meadows).

ISA topic	ISA objective	Significant effect?	Commentary
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	?	*Development at the site would have an uncertain effect on the historic environment.* The site is 217m from the nearest archaeologically sensitive area, 299m from the nearest conservation area (Raglan), 326m from the nearest grade II listed building, 400m from the nearest scheduled monument (Reglan Churchyard Cross), 420m from the nearest grade II* listed building, and 884m from the nearest grade I listed building. The site is 1.5ha in size. The aforementioned heritage assets are relatively far away from the site and screened by existing development. Nevertheless, a degree of uncertainty is noted as the site could still disturb nearby archaeological remains.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	+	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park.*
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (Flood Zone 2 and 3).* Whilst the site is within Flood Zone 1, it is recognised that the area immediately to the north and northeast of the site is within fluvial Flood Zone 2 or 3.
		+	*The site does not intersect with a high surface water flood risk area (Flood Zones 2 and 3).*

Employment

CS0278 – Land west of Raglan

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	++	*New employment land proposed at the site.* The site is proposed for employment use.
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	0	*The site will deliver new employment land.*
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	0	*N/A*
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	0	*N/A*
		0	*N/A*
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Raglan LSOA, which is amongst the 20-30% least deprived LSOAs in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	0	*N/A*
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The western boundary of the site is adjacent to a river.

ISA topic	ISA objective	Significant effect?	Commentary
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		-	*The site intersects with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.
		+	*The site does not intersect with a mineral safeguarding area.*
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.* The site is 436m from the nearest area of ancient woodland, 540m from the nearest priority habitat (traditional orchard), and 736m from the nearest SINC (Broom House Meadows).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	-	*Development at the site has the potential for a negative effect on the historic environment.* The site is 69m from the nearest archaeologically sensitive area, 99m from the nearest conservation area (Raglan), 114m from the nearest grade II listed building, 387m from the nearest grade II* listed building, 389m from the nearest scheduled monument (Reglan Churchyard Cross), and 729m from the nearest grade I listed building. The site is 4.5ha in size; however, the aforementioned heritage assets are screened by existing development. Nevertheless, development still has the potential to disturb archaeological remains.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	+	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park.*

ISA topic	ISA objective	Significant effect?	Commentary
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	-	*The site intersects with fluvial Flood Zone 2 or 3.* Less than 50% of the site intersects with fluvial Flood Zone 2 or 3. However, it is recognised that fluvial flood risk is isolated to the western boundary of the site.
		-	*The site intersects with surface water Flood Zone 2 or 3.* Less than 50% of the site intersects with surface water Flood Zone 2 or 3. However, it is recognised that surface water flood risk is isolated to the southeastern corner of the site.

Tourism / Leisure / Commercial (A1 / A3 / C1 / D1 / Sui Generis)

DS0281 – Raglan Country Estate

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	++	*New employment land proposed at the site.* The site is proposed for tourism/ leisure/ commercial use (A1/ A3/ C1/ D1/ D2/ sui generis).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	0	*The site will deliver new employment land.*
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	0	*N/A*
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	0	*N/A*
		0	*N/A*

ISA topic	ISA objective	Significant effect?	Commentary
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Raglan LSOA, which is amongst the 20-30% least deprived LSOAs in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	0	*N/A*
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site intersects with a river.
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		-	*The site intersects with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site comprises a former golf course and agricultural land.
		+	*The site does not intersect with a mineral safeguarding area.*
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	--	*The site intersects or is adjacent to an internationally (SAC, SPA, Ramsar) or nationally (SSSI, Ancient Woodland, NNRs) designated site.* The southeastern corner of the site intersects with two areas of ancient woodland, whilst the western extent of the site contains two priority habitats (tradition orchard). In addition, the site is 11m from the nearest SINC (Carreg Wen).

ISA topic	ISA objective	Significant effect?	Commentary
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	?	*Development at the site would have an uncertain effect on the historic environment.* The site is 538m from the nearest conservation area (Raglan), 616m from the nearest archaeologically sensitive area, 627m from the nearest grade II listed building, 803m from the nearest scheduled monument (Raglan Churchyard Cross), and 814m from the nearest grade II* listed building. The site is very large (92 ha); however, the aforementioned heritage assets are relatively far away from the site and some are screened by existing development. Nevertheless, given the size of the site, uncertainty is noted at this stage.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	+	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park.*
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (Flood Zones 2 and 3).*
		-	*The site intersects with surface water Flood Zone 2 or 3.* Less than 50% of the site intersects with surface water Flood Zone 2 or 3.

Rogiet

Residential

CS0168 – Land adjacent to Merlin Close

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	+	*The site has good access to existing employment (≤800m from an employment centre).* The site is 500-600m from the nearest protected employment site (Progress Industrial Estate, Rogiet).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	--	*The site could deliver new homes or employment land; however, the site wholly intersects with a designated green wedge.* The site has capacity to deliver 168 new homes; however, it wholly intersects with a designated green wedge.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	+	*The site is within reasonable walking distance (≤800m) to a primary or a secondary school (≤1,600m).* The site is 700-800m from the nearest primary school (Rogiet Primary); however, it is 2.5-3km from the nearest secondary school (Caldicot Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	*The site is within 800m of a health service or an active travel route.* The site is not within 800m of a health service; however, it intersects with a PRoW (378/21/1).
		++	*The site is within 800m of a formal leisure and green space.* The site is 0-50m from the nearest area of amenity importance and green space (playing field).

ISA topic	ISA objective	Significant effect?	Commentary
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Rogiet LSOA, which is amongst the 30-40% least deprived LSOAs in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 100-200m from the nearest bus stop (Green Farm) and it intersects with a PRoW (378/21/1). It is also 464m from the nearest National Cycle Network route. However, it is not within reasonable walking distance to a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 486m from the nearest waterbody (river).
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.
		--	The site intersects with a mineral safeguarding area.

ISA topic	ISA objective	Significant effect?	Commentary
			The site intersects with a mineral safeguarding area for carboniferous limestone, and sand and gravel.
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.* The site is 180m from the nearest priority habitat (lowland calcareous grassland), 200m from the nearest SINC (Rogiet Country Park), 488m from the nearest SSSI (Rectory Meadow – Rogiet), and 514m from the nearest area of ancient woodland.
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	--	*Development at the site has the potential for a significant negative effect on the historic environment.* The site wholly intersects with an archaeologically sensitive area. In addition, the western boundary of the site is adjacent to a conservation area (Rogiet). The site is also 106m from the nearest grade II listed building, 132m from the nearest grade II* listed building, and 205m from the nearest scheduled monument (St. Michael's Churchyard Cross, Llanfihangel Rogiet). The size is relatively large (3.6ha) and development is likely to disturb on-site archaeological remains. The site is also likely to impact the setting of the adjacent conservation area, as well as the listed buildings within it.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	+	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park.*
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (Flood Zones 2 and 3).*
		-	*The site intersects with surface water Flood Zone 2 or 3.*

ISA topic	ISA objective	Significant effect?	Commentary
			Less than 50% of the site intersects with surface water Flood Zone 2 or 3.

CS0256 – The Paddocks, Land adjacent to Rogiet Pool

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	+	*The site has good access to existing employment (≤800m from an employment centre).* The site is 400-500m from the nearest protected employment site (Progress Industrial Estate, Rogiet).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	+	*The site has capacity to deliver new homes (<100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 5 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	+	*The site is within reasonable walking distance (≤800m) to a primary or a secondary school (≤1,600m).* The site is 600-700m from the nearest primary school (Rogiet Primary); however, it is 2.5-3km from the nearest secondary school (Caldicot Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	*The site is within 800m of a health service or an active travel route.* The site is not within 800m of a health service; however, it is 16m from the nearest PRoW.
		++	*The site is within 800m of a formal leisure and green space.* The site is 0-50m from the nearest area of amenity importance and 200-300m from the nearest green space (play space).

ISA topic	ISA objective	Significant effect?	Commentary
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Rogiet LSOA, which is amongst the 30-40% least deprived LSOAs in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 100-200m from the nearest bus stop (Pool, Severn Tummel Junction – Rogiet Pool) and 16m from the nearest PRoW. It is also 470m from the nearest National Cycle Network route. However, it is not within reasonable walking distance to a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 816m from the nearest waterbody (river).
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	++	*The site is wholly brownfield land.* The site comprises stables.
		--	*The site is within a mineral safeguarding area.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site is within a mineral safeguarding area for carboniferous limestone.
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.* The site is 105m from the nearest priority habitat (lowland calcareous grassland), 308m from the nearest SSSI (Rectory Meadow – Rogiet), 432m from the nearest area of ancient woodland, and 477m from the nearest SINC (Rogiet Country Park).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	--	*Development at the site has the potential for a significant negative effect on the historic environment.* The site wholly intersects with an archaeologically sensitive area. In addition, the site is 253m from the nearest grade II listed building, 262m from the nearest conservation area (Rogiet), 333m from the nearest grade II* listed building, and 518m from the nearest scheduled monument (St. Michael's Churchyard Cross, Llanfihangel Rogiet). The site is very small (0.2ha); however, development is likely to disturb on-site archaeological remains.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	+	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park.*
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (Flood Zone 2 and 3).*
		+	*The site does not intersect with a high surface water risk area (Flood Zone 2 and 3).*

Employment (B2 / B8)

CS0255 – Land adjacent to Ifton Industrial Estate

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	++	*New employment land proposed at the site.* The site is proposed for employment use (B2/ B8).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	--	*The site could deliver new homes or employment land; however, the site wholly intersects with a designated green wedge.* The site will deliver employment land; however, it falls wholly within a designated green wedge.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	0	*N/A*
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	0	*N/A*
		0	*N/A*
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Rogiet LSOA, which is amongst the 30-40% least deprived LSOAs in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	0	*N/A*
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	0	*The site does not contain and is not in close proximity to a waterbody, nor does it fall within the River Wye Catchment Area.*

ISA topic	ISA objective	Significant effect?	Commentary
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	++	*The site is wholly brownfield land.* The site comprises a parking area.
		--	*The site is within a mineral safeguarding area.* The site is within a mineral safeguarding area for carboniferous limestone.
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.* The site is 79m from the nearest priority habitat (open mosaic habitat on previously developed land), 387m from the nearest SINC (West of Caldicot), 388m from the nearest area of ancient woodland, and 632m from the nearest SSSI (Rectory Meadow – Rogiet).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	--	*Development at the site has the potential for a significant negative effect on the historic environment.* The site wholly intersects with an archaeologically sensitive area. In addition, the site is 663m from the nearest grade II* listed building and 697m from the nearest grade II listed building. The site is small (0.1ha) and regeneration of the parking area has the potential to improve the historic environment in this location. Nevertheless, development is likely to disturb on-site archaeological remains.

ISA topic	ISA objective	Significant effect?	Commentary
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	++	*The site is predominantly brownfield and does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park.*
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (Flood Zone 2 and 3).* Whilst the site is within Flood Zone 1, it is recognised that the area immediately to the south of the site is within fluvial Flood Zone 2 or 3.
		+	*The site does not intersect with a high surface water flood risk area (Flood Zone 2 and 3).*

Mixed Use: Residential (C3), Employment (B1 / B2 / B8)

CS0253 – Ifton Manor Farm (Site A)

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	++	*New employment land proposed at the site.* The site is proposed for mixed-use development, including employment use (B1/ B2/ B8).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	-	*The site could deliver new homes or employment land; however, the site partially intersects with a designated green wedge.* The site has capacity to deliver 440 new homes; however, it almost wholly intersects with a designated green wedge.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	++	*The site is within reasonable walking distance (≤800m) to a primary and a secondary school (≤1,600m).*

ISA topic	ISA objective	Significant effect?	Commentary
			The site is 400-500m from the nearest primary school (Dewstow Primary) and 1,200-1,300m from the nearest secondary school (Caldicot Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	++	*The site is within 800m of a health service and an active travel route.* The site is 400-500m from the nearest dentist (Teeth for Life, Caldicot), 500-600m from the nearest GP surgery (Caldicot Health Centre, Caldicot), and it intersects with a PRoW (378/10/4).
		++	*The site is within 800m of a formal leisure and green space.* The site is 100-200m from the nearest area of amenity importance and 50-100m from the nearest green space (play space).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Rogiet LSOA, which is amongst the 30-40% least deprived LSOAs in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	++	*The site is within close proximity (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, and an active travel route.* The site is 0-50m from the nearest bus stop (Cherry Tree Nursing Home, Ifton Quarry), 400-500m from the nearest neighbourhood centre (West End, Caldicot), and it intersects with a PRoW (378/10/4). It is also 449m from the nearest National Cycle Network route.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site is 984m from the nearest waterbody (river).
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.
		--	*The site is within a mineral safeguarding area.* The site is within a mineral safeguarding area for carboniferous limestone, and sand and gravel.
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	-	*The site intersects or is adjacent to a regionally or locally (LNRs and SINCs) designated site and/ or priority habitats/ species.* The eastern boundary of the site is adjacent to a SINC (West of Caldicot). In addition, the site is 118m from the nearest priority habitat (open mosaic habitat on previously developed land), 393m from the nearest area of ancient woodland, and 670m from the nearest SSSI (Rectory Meadow – Rogiet).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	--	*Development at the site has the potential for a significant negative effect on the historic environment.* The site wholly intersects an archaeologically sensitive area. In addition, the site is 410m from the nearest grade II* listed building and 435m from the nearest grade II listed building. The site is very large (19.5ha) and development is likely to disturb on-site archaeological remains.

ISA topic	ISA objective	Significant effect?	Commentary
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	+	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park.*
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (Flood Zone 2 and 3).*
		-	*The site intersects with Flood Zone 2 or 3.* Less than 50% of the site intersects with surface water Flood Zone 2 or 3. However, it is recognised that this is isolated to two small areas within the site.

Open Space, Green Infrastructure, Active Travel Links, Drainage associated with proposed residential and employment to the north

CS0254 – Ifton Manor Farm (Site B)

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	0	*N/A* The site is proposed for open space, green infrastructure, active travel links, and drainage associated with proposed residential and employment development to the north (Site A).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	--	*The site could deliver new homes or employment land; however, the site wholly intersects with a designated green wedge.* The site falls within a designated green wedge.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	0	*N/A*

ISA topic	ISA objective	Significant effect?	Commentary
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	0	*N/A*
		0	*N/A*
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Rogiet LSOA, which is amongst the 30-40% least deprived LSOAs in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	0	*N/A*
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 666m from the nearest waterbody (river).
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	0	*N/A* The site is not proposed for development.
		--	*The site is within a mineral safeguarding area.* The site is within a mineral safeguarding area for sand and gravel.

ISA topic	ISA objective	Significant effect?	Commentary
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.* The site is 6m from the nearest SINC (West of Caldicot), 386m from the nearest priority habitat (open mosaic habitat on previously developed land), 638m from the nearest area of ancient woodland, 714m from the nearest SSSI (Gwent Levels – Magor and Undy), and 998m from the nearest SAC, SPA and Ramsar site (Severn Estuary).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	?	*Development at the site would have an uncertain effect on the historic environment.* The site wholly intersects with an archaeologically sensitive area. In addition, the site is 613m from the nearest grade II listed building, 619m from the nearest grade II* listed building, and 785m from the nearest conservation area (Rogiet) The site is very large (15.3ha) and development has the potential to disturb on-site archaeological remains. However, it is recognised that this site is not proposed for housing development, and therefore archaeological remains are less likely to be disturbed. Nevertheless, uncertainty is noted at this stage.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	+	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park.*
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (Flood Zone 2 and 3).*
		-	*The site intersects with surface water Flood Zone 2 or 3.* Less than 50% of the site intersects with surface water Flood Zone 2 or 3.

Shirenewton

Residential

CS0029 - Barnetts Farm

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	-	*The site has poor access to existing employment (>1,600m from an employment centre).* The site is 1,800-1,900m from the nearest protected employment site (Station Road and School Hill, both in Chepstow).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	+	*The site has capacity to deliver new homes (<100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 15 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	+	*The site is within reasonable walking distance (≤800m) to a primary or a secondary school (≤1,600m).* The site is 1,600-1,700m from the nearest primary school (St Mary's Roman Catholic Primary); however, it is 1,400-1,500m from the nearest secondary school (Chepstow Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	*The site is within 800m of a health service or an active travel route.* The site is not within 800m of a health service; however, it is 7m from the nearest PRoW.
		++	*The site is within 800m of a formal leisure and green space.* The site is 200-300m from the nearest area of amenity importance and 400-500m from the nearest green space (play space).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site falls within the Shirenewton LSOA, which is amongst the 10-20% least deprived LSOAs in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 700-800m from the nearest bus stop (Chepstow Community Hospital and St Lawrence Park Estate) and is 7m from the nearest PRoW. It is also 47m from the nearest National Cycle Network route. However, it is not within reasonable walking distance to a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 623m from the nearest waterbody (river) and falls wholly within the River Wye Catchment Area.
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	++	*The site is wholly brownfield land.* The site comprises agricultural buildings.
		--	*The site is within a mineral safeguarding area.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site is within a mineral safeguarding area for carboniferous limestone.
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.* The site is 226m from the nearest area of ancient woodland, 335m from the nearest SINC (Part of Bishop's Barnets Wood), and 469m from the nearest priority habitat (traditional orchard).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	+	*Regeneration of brownfield land that is currently detracting from the historic environment.* The site is 385m from the nearest conservation area (Mounton), 387m from the nearest grade II listed building, 556m from the nearest scheduled monument (Bishop Barnet's Wood Camp), and 637m from the nearest grade II* listed building. The site is relatively small (1.1ha) and relatively far away from the aforementioned heritage assets. By regenerating land that currently comprises agricultural buildings, the site has the potential to improve the setting of the historic environment in this location.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	-	*The site intersects with an Area of Outstanding Natural Beauty, National Park or Country Park.* The site is brownfield; however, it wholly intersects with an AONB (Wye Valley).
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (flood zone 2 and 3).*
		+	*The site does not intersect with a high surface flood risk area (flood zone 2 and 3).*

CS0112 - Land at St Lawrence Lane

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	0	*The site has reasonable access to existing employment (800-1,600m from an employment centre).* The site is 1,200-1,300m from the nearest protected employment site (Bulwark Road, Chepstow).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	--	*The site could deliver new homes or employment land; however, the site wholly intersects with a designated green wedge.* The site has capacity to deliver 300 new homes; however, it wholly intersects with a designated green wedge.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	+	*The site is within reasonable walking distance (≤800m) to a primary or a secondary school (≤1,600m).* The site is 800-900m from the nearest primary school (St Mary's Roman Catholic Primary) and secondary school (Mounton House Special School).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	*The site is within 800m of a health service or an active travel route.* The site is not within 800m of a health service; however, it is 5m from the nearest PRoW.
		++	*The site is within 800m of a formal leisure and green space.* The site is 400-500m from the nearest area of amenity importance and green space (playing field).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Shirenewton LSOA, which is amongst the 10-20% least deprived LSOAs in Wales.

ISA topic	ISA objective	Significant effect?	Commentary
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 0-50m from the nearest bus stop (Brynderwen Lane) and is 5m from the nearest PRoW. It is also 172m from the nearest National Cycle Network route. However, it is not within reasonable walking distance to a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 488m from the nearest waterbody (river) and falls wholly within the River Wye Catchment Area.
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.
		--	*The site is within a mineral safeguarding area.* The site is within a mineral safeguarding area for carboniferous limestone.

ISA topic	ISA objective	Significant effect?	Commentary
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	--	*The site intersects or is adjacent to an internationally (SAC, SPA, Ramsar) or nationally (SSSI, Ancient Woodland, NNRs) designated site.* The central and southern extents of the site contain areas of ancient woodland (17% overlap). In addition, the site is 1m from the nearest priority habitat (parkland) and 642m from the nearest SINC (Parc Penterry Meadow).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	--	*Development at the site has the potential for a significant negative effect on the historic environment.* The southern extent of the site intersects with a conservation area (Mathern) (5% overlap). In addition, the site is 23m from the nearest grade II listed building, 616m from the nearest grade II* listed building, 906m from the nearest archaeologically sensitive area, and 916m from the nearest scheduled monument (Bishop Barnet's Wood Camp). The site is very large (20ha), and whilst there is some screening from trees along the southeastern boundary of the site, the site is still likely to impact the setting of the conservation area and two grade II listed buildings within it.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	?	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park; however, the site is either adjacent to/ within close proximity to one of these designated landscapes, and/ or the scale of development proposed (≥ 100 dwellings) on greenfield land has the potential for a negative effect. This is uncertain at this stage.* The site is 281m from the nearest AONB (Wye Valley) and will deliver 300 homes on agricultural land.

ISA topic	ISA objective	Significant effect?	Commentary
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (flood zone 2 and 3).*
		-	*The site intersects with surface water flood zone 2 or 3.* Less than 50% of the site intersects with Flood Zone 2 or 3 (surface water).

CS0054 - Land west of Racecourse Roundabout

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	0	*The site has reasonable access to existing employment (800-1,600m from an employment centre).* The site is 1,400-1,500m from the nearest protected employment site (School Hill, Chepstow).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	++	*The site has capacity to deliver a significant number of new homes (≥ 100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 100 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	+	*The site is within reasonable walking distance (≤800m) to a primary or a secondary school (≤1,600m).* The site is 900-1,000m from the nearest primary school (The Dell Primary); however, it is 500-600m from the nearest secondary school (Chepstow Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	*The site is within 800m of a health service or an active travel route.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site is not within 800m of a health service; however, it intersects with a PRoW (379/3/1).
		++	*The site is within 800m of a formal leisure and green space.* The site is 200-300m from the nearest area of amenity importance and 100-200m from the nearest green space (play space).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the St. Arvans LSOA, which is amongst the 20-30% least deprived LSOAs in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 100-200m from the nearest bus stop (Lions' Lodge and Owls Nest) and it intersects with a PRoW (379/3/1). It is also 15m from the nearest National Cycle Network route. However, it is not within reasonable walking distance to a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 635m from the nearest waterbody (coast) and falls wholly within the River Wye Catchment Area.
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*

ISA topic	ISA objective	Significant effect?	Commentary
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.
		--	*The site is within a mineral safeguarding area.* The site is within a mineral safeguarding area for limestone.
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	--	*The site intersects or is adjacent to an internationally (SAC, SPA, Ramsar) or nationally (SSSI, Ancient Woodland, NNRs) designated site.* The central and southern extent of the site contains a SINC (Crossway Green) (79% overlap). In addition, the western boundary of the site is adjacent to an area of ancient woodland. The site is also 214m from the nearest priority habitat (traditional orchard), 540m from the nearest SAC (Wye Valley Woodlands/ Coetiroedd Dyffryn Gwy), and 540m from the nearest SSSI (Pierce, Alcove And Piercefield Woods).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	--	*Development at the site has the potential for a significant negative effect on the historic environment.* The site is 41m from the nearest grade II listed building, 178m from the nearest scheduled monument (Bishop Barnet's Wood Camp), 579m from the nearest conservation area (Chepstow), and 824m from the nearest archaeologically sensitive area. The site is relatively large (4.8ha), and whilst the nearest grade II listed buildings is separated from the site by a roundabout, the site is still likely to impact its setting. Development also has the potential to disturb nearby archaeological remains.

ISA topic	ISA objective	Significant effect?	Commentary
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	--	*The site is predominantly greenfield and wholly falls within an Area of Outstanding Natural Beauty, National Park or Country Park.* The site wholly falls within an AONB (Wye Valley).
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (flood zone 2 and 3).*
		-	*The site intersects with surface water flood zone 2 or 3.* Less than 50% of the site intersects with surface water Flood Zone 2 or 3. However, it is recognised that this is isolated to a small area in the southwestern corner of the site.

CS0026 – Land at West of Baileys Hay

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	0	*The site has reasonable access to existing employment (800-1,600m from an employment centre).* The site is 1,400-1,500m from the nearest protected employment site (Newhouse Farm, Chepstow).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	+	*The site has capacity to deliver new homes (<100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 50 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	--	*The site is >1,600m from a primary school and secondary school.* The site is 2.5-3km from the nearest primary school (Pembroke Primary and St Mary's Roman Catholic Primary) and 1,800-1,900m from the nearest secondary school (Mounton House Special School).

ISA topic	ISA objective	Significant effect?	Commentary
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	*The site is within 800m of a health service or an active travel route.* The site is not within 800m of a health service; however, it intersects with a PRoW (373/38/1).
		++	*The site is within 800m of a formal leisure and green space.* The site is 100-200m from the nearest area of amenity importance and green space (play space).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Shirenewton LSOA, which is amongst the 10-20% least deprived LSOAs in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 100-200m from the nearest bus stop (Mathern Village Hall) and it intersects with a PRoW (373/38/1). It is also 393m from the nearest National Cycle Network route. However, it is not within reasonable walking distance to a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 36m from the nearest waterbody (river) and falls wholly within the River Wye Catchment Area.

ISA topic	ISA objective	Significant effect?	Commentary
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.
		--	*The site is within a mineral safeguarding area.* The site is within a mineral safeguarding area for sand and gravel.
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.* The site is 65m from the nearest SINC (Mathern Hill), 68m from the nearest priority habitat (purple moor grass and rush pastures), and 613m from the nearest area of ancient woodland.
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	--	*Development at the site has the potential for a significant negative effect on the historic environment.* The site is 15m from the nearest grade II listed building, 64m from the nearest conservation area (Mathern), 72m from the nearest grade II* listed building, 537m from the nearest archaeologically sensitive area, 787m from the nearest scheduled monument (Moated site south of Moynes Court), and 953m from the nearest grade I listed building. The site is relatively small (2.5ha); however, given its proximity to several heritage assets, particularly the listed buildings, it is likely to impact their setting.

ISA topic	ISA objective	Significant effect?	Commentary
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	?	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park; however, the site is either adjacent to/ within close proximity to one of these designated landscapes, and/ or the scale of development proposed (≥ 100 dwellings) on greenfield land has the potential for a negative effect. This is uncertain at this stage.* The site is 810m from the nearest AONB (Wye Valley).
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (flood zone 2 and 3).*
		+	*The site does not intersect with a high surface flood risk area (flood zone 2 and 3).*

CS0053 – Land to the east Cherry Trees

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	0	*The site has reasonable access to existing employment (800-1,600m from an employment centre).* The site is 800-900m from the nearest protected employment site (Newhouse Farm, Chepstow).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	--	*The site could deliver new homes or employment land; however, the site wholly intersects with a designated green wedge.* The site has capacity to deliver 10 new homes; however, it wholly intersects with a designated green wedge.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	--	*The site is >1,600m from a primary school and secondary school.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site is 2-2.5km from the nearest primary school (Pembroke Primary and St Mary's Roman Catholic Primary) and secondary school (Mounton House Special School).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	*The site is within 800m of a health service or an active travel route.* The site is not within 800m of a health service; however, it is 24m from the nearest PRoW.
		--	*The site is not within 800m of a formal leisure and green space or intersects with a formal leisure or green space and may result in their loss.* The site wholly intersects with an area of amenity importance and is 0-50m from the nearest green space (playing field).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Shirenewton LSOA, which is amongst the 10-20% least deprived LSOAs in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 0-50m from the nearest bus stop (Mathern Road) and 24m from the nearest PRoW. However, it is not within reasonable walking distance to a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site intersects with a river and falls wholly within the River Wye Catchment Area.
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for grazing/ DES2.
		--	*The site is within a mineral safeguarding area.* The site is within a mineral safeguarding area for sand and gravel.
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.* The site is 5m from the nearest priority habitat (traditional orchard), 93m from the nearest SINC (Wyelands), and 352m from the nearest area of ancient woodland.
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	--	*Development at the site has the potential for a significant negative effect on the historic environment.* The site wholly intersects with a conservation area (Mathern). In addition, the site is 104m from the nearest archaeologically sensitive area, 108m from the nearest grade II listed building, 404m from the nearest grade II* listed building, 469m from the nearest grade I listed building, and 472m from the nearest scheduled monument (Moated site south of Moynes Court).

ISA topic	ISA objective	Significant effect?	Commentary
			The site is relatively small (0.5ha); however, as it wholly intersects with a conservation area, it is likely to impact its setting. Development also has the potential to disturb nearby archaeological remains.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	+	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park.*
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	-	*The site intersects with fluvial flood zone 2 or 3.* Less than 50% of the site intersects with fluvial Flood Zone 2 or 3. However, it is recognised that this is largely isolated to the western boundary of the site.
		-	*The site intersects with surface water flood zone 2 or 3.* Less than 50% of the site intersects with surface water Flood Zone 2 or 3. However, it is recognised that this is largely isolated to the western boundary of the site.

CS0030 – Land off Chapel Lane

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	0	*The site has reasonable access to existing employment (800-1,600m from an employment centre).* The site is 1,500-1,600m from the nearest protected employment site (Newhouse Farm, Chepstow).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	--	*The site could deliver new homes or employment land; however, the site wholly intersects with a designated green wedge.* The site has capacity to deliver 50 new homes; however, it wholly intersects with a designated green wedge.

ISA topic	ISA objective	Significant effect?	Commentary
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	-	*The site is not within reasonable walking distance (≤800m) to a primary or a secondary school (≤1,600m).* The site is 2-2.5km from the nearest primary school (St Mary's Roman Catholic Primary and Pembroke Primary); however, it is 1,400-1,500m from the nearest secondary school (Mounton House Special School).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	*The site is within 800m of a health service or an active travel route.* The site is not within 800m of a health service; however, it intersects with three PRoWs (373/40/1, 373/41/1 and 373/72/2).
		++	*The site is within 800m of a formal leisure and green space.* The site is 200-300m from the nearest area of amenity importance and 300-400m from the nearest green space (play space).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Shirenewton LSOA, which is amongst the 10-20% least deprived LSOAs in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 200-300m from the nearest bus stop (New Inn and Mathern Village Hall) and it intersects with three PRoWs (373/40/1, 373/41/1 and 373/72/2). It is also 237m from the nearest National Cycle Network route. However, it is not within reasonable walking distance to a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*

ISA topic	ISA objective	Significant effect?	Commentary
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The western boundary of the site is adjacent to a river (Mounton Brook) and falls wholly within the River Wye Catchment Area.
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.
		--	*The site is within a mineral safeguarding area.* The site is within a mineral safeguarding area for sand and gravel.
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.* The site is 159m from the nearest SINC (Mathern Hill), 198m from the nearest priority habitat (purple moor grass and rush pastures), and 486m from the nearest area of ancient woodland.
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	--	*Development at the site has the potential for a significant negative effect on the historic environment.* The site is 5m from the nearest conservation area (Mathern), 103m from the nearest grade II listed building, 251m from the nearest grade II* listed building, 728m from the nearest archaeologically

ISA topic	ISA objective	Significant effect?	Commentary
			sensitive area, and 981m from the nearest scheduled monument (Moated site south of Moynes Court). The site is relatively large (4.4ha) and is therefore likely to impact the setting of the conservation area immediately to the east of the site. It is also likely to impact the setting of two grade II listed buildings located to the northwest and south of the site.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	?	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park; however, the site is either adjacent to/ within close proximity to one of these designated landscapes, and/ or the scale of development proposed (≥ 100 dwellings) on greenfield land has the potential for a negative effect. This is uncertain at this stage.* The site is 579m from the nearest AONB (Wye Valley).
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	-	*The site intersects with fluvial flood zone 2 or 3.* Less than 50% of the site intersects with fluvial Flood Zone 2 or 3. However, it is recognised that this is isolated to the northwestern extent of the site.
		-	*The site intersects with surface water flood zone 2 or 3.* Less than 50% of the site intersects with surface water Flood Zone 2 or 3. However, it is recognised that this is isolated to the northwestern extent of the site.

CS0218 – Land east of Ditch Hill Lane (Option A)

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	-	*The site has poor access to existing employment (>1,600m from an employment centre).* The site is 6-7km from the nearest protected employment site (Newhouse Farm, Bulwark Road, Job Centre, School Hill and Station Road, all in Chepstow, and Severn Bridge in Caldicot).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	-	*The site could deliver new homes or employment land; however, the site partially intersects with a designated green wedge.* The site has capacity to deliver 17 new homes; however, it almost wholly intersects with a designated green wedge.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	+	*The site is within reasonable walking distance (≤800m) to a primary or a secondary school (≤1,600m).* The site is 300-400m from the nearest primary school (Shirenewton Primary); however, it is 5-6km from the nearest secondary school (Mounton House Special School).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	*The site is within 800m of a health service or an active travel route.* The site is not within 800m of a health service; however, it is adjacent to a PRoW.
		++	*The site is within 800m of a formal leisure and green space.* The site is 200-300m from the nearest area of amenity importance and 100-200m from the nearest green space (cemetery).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Shirenewton LSOA, which is amongst the 10-20% least deprived LSOAs in Wales.

ISA topic	ISA objective	Significant effect?	Commentary
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 200-300m from the nearest bus stop (Tredegar Arms) and it is adjacent to a PRoW. It is also 164m from the nearest National Cycle Network route. However, it is not within reasonable walking distance to a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 265m from the nearest waterbody (river) and falls wholly within the River Wye Catchment Area.
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.
		+	*The site does not intersect with a mineral safeguarding area.*
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	-	*The site intersects or is adjacent to a regionally or locally (LNRs and SINCs) designated site and/ or priority habitats/ species.*

ISA topic	ISA objective	Significant effect?	Commentary
			The eastern boundary of the site is adjacent to a SINC (Shirenewton Meadows). In addition, the site is 9m from the nearest priority habitat (lowland meadows), 253m from the nearest area of ancient woodland, 584m from the nearest SAC (Wye Valley and Forest of Dean Bat Sites/ Safleoedd Ystlumod Dyffryn Gwy a Fforest y Ddena), and 584m from the nearest SSSI (Mwyngloddfa Mynydd-Bach).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	--	*Development at the site has the potential for a significant negative effect on the historic environment.* The southwestern boundary of the site intersects with a conservation area (Shirenewton). In addition, the site is 194m from the nearest grade II listed building. The site is small (0.5ha) and the southwestern boundary is screened by trees. Nevertheless, the site is still likely to impact the setting of the conservation area to some degree.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	?	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park; however, the site is either adjacent to/ within close proximity to one of these designated landscapes, and/ or the scale of development proposed (≥ 100 dwellings) on greenfield land has the potential for a negative effect. This is uncertain at this stage.* The site is 241m from the nearest AONB (Wye Valley).
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (flood zone 2 and 3).*
		+	*The site does not intersect with a high surface flood risk area (flood zone 2 and 3).*

CS0225 – Land east of Ditch Hill Lane (Option B)

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	-	*The site has poor access to existing employment (>1,600m from an employment centre).* The site is 6-7km from the nearest protected employment site (Bulwark Road, Job Centre, Newhouse Farm, School Hill and Station Road, all in Chepstow, and Severn Bridge in Caldicot).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	-	*The site could deliver new homes or employment land; however, the site partially intersects with a designated green wedge.* The site has capacity to deliver 22 new homes; however, it almost wholly intersects with a designated green wedge.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	+	*The site is within reasonable walking distance (≤800m) to a primary or a secondary school (≤1,600m).* The site is 200-300m from the nearest primary school (Shirenewton Primary); however, it is 5-6km from the nearest secondary school (Mounton House Special School).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	*The site is within 800m of a health service or an active travel route.* The site is not within 800m of a health service; however, it intersects with a PRoW (380/28/1).
		++	*The site is within 800m of a formal leisure and green space.* The site is 200-300m from the nearest area of amenity importance and 100-200m from the nearest green space (cemetery).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Shirenewton LSOA, which is amongst the 10-20% least deprived LSOAs in Wales.

ISA topic	ISA objective	Significant effect?	Commentary
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 100-200m from the nearest bus stop (Tredegar Arms) and it intersects with a PRoW (380/28/1). It is also 164m from the nearest National Cycle Network route. However, it is not within reasonable walking distance to a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 265m from the nearest waterbody (river) and falls wholly within the River Wye Catchment Area.
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.
		+	*The site does not intersect with a mineral safeguarding area.*
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	-	*The site intersects or is adjacent to a regionally or locally (LNRs and SINCs) designated site and/ or priority habitats/ species.*

ISA topic	ISA objective	Significant effect?	Commentary
			The eastern boundary of the site is adjacent to a SINC (Shirenewton Meadows). In addition, the site is 9m from the nearest priority habitat (lowland meadows), 217m from the nearest area of ancient woodland, 583m from the nearest SAC (Wye Valley and Forest of Dean Bat Sites/ Safleoedd Ystlumod Dyffryn Gwy a Fforest y Ddena), and 583m from the nearest SSSI (Mwyngloddfa Mynydd-Bach).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	--	*Development at the site has the potential for a significant negative effect on the historic environment.* The southwestern boundary of the site intersects with a conservation area (Shirenewton). In addition, the site is 194m from the nearest grade II listed building. The site is small (0.8ha) and the southwestern boundary is screened by trees. Nevertheless, the site is still likely to impact the setting of the conservation area to some degree.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	?	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park; however, the site is either adjacent to/ within close proximity to one of these designated landscapes, and/ or the scale of development proposed (≥ 100 dwellings) on greenfield land has the potential for a negative effect. This is uncertain at this stage.* The site is 235m from the nearest AONB (Wye Valley).
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (flood zone 2 and 3).*
		+	*The site does not intersect with a high surface flood risk area (flood zone 2 and 3).*

CS0226 – Ditch Hill Lane C, Shirenewton

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	-	*The site has poor access to existing employment (>1,600m from an employment centre).* The site is 6-7km from the nearest protected employment site (School Hill, Station Road, Bulwark Road, Job Centre and Newhouse Farm, all in Chepstow, and Severn Bridge in Caldicot).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	-	*The site could deliver new homes or employment land; however, the site partially intersects with a designated green wedge.* The site has capacity to deliver 36 new homes; however, it almost wholly intersects with a designated green wedge.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	+	*The site is within reasonable walking distance (≤800m) to a primary or a secondary school (≤1,600m).* The site is 50-100m from the nearest primary school (Shirenewton Primary); however, it is 5-6km from the nearest secondary school (Chepstow Comprehensive and Mounton House Special School).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	*The site is within 800m of a health service or an active travel route.* The site is not within 800m of a health service; however, it intersects with a PRoW (380/28/1).
		+	*The site is within 800m of a formal leisure and green space.* The site is 200-300m from the nearest area of amenity importance and 100-200m from the nearest green space (cemetery).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Shirenewton LSOA, which is amongst the 10-20% least deprived LSOAs in Wales.

ISA topic	ISA objective	Significant effect?	Commentary
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 100-200m from the nearest bus stop (Tredegar Arms) and it intersects with a PRoW (380/28/1). It is also 164m from the nearest National Cycle Network route. However, it is not within reasonable walking distance to a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 265m from the nearest waterbody (river) and falls wholly within the River Wye Catchment Area.
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.
		+	*The site does not intersect with a mineral safeguarding area.*
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	-	*The site intersects or is adjacent to a regionally or locally (LNRs and SINCs) designated site and/ or priority habitats/ species.*

ISA topic	ISA objective	Significant effect?	Commentary
			The southeastern boundary of the site is adjacent to a SINC (Shirenewton Meadows). In addition, the site is 9m from the nearest priority habitat (lowland meadows), 121m from the nearest area of ancient woodland, 519m from the nearest SSSI (Llwyn y Celyn Wetland), and 543m from the nearest SAC (Wye Valley and Forest of Dean Bat Sites/ Safleoedd Ystlumod Dyffryn Gwy a Fforest y Ddena).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	--	*Development at the site has the potential for a significant negative effect on the historic environment.* The southwestern boundary of the site intersects with a conservation area (Shirenewton). In addition, the site is 194m from the nearest grade II listed building. The site is relatively small (1.4ha) and the southwestern boundary is screened by trees. Nevertheless, the site is still likely to impact the setting of the conservation area to some degree.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	?	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park; however, the site is either adjacent to/ within close proximity to one of these designated landscapes, and/ or the scale of development proposed (≥ 100 dwellings) on greenfield land has the potential for a negative effect. This is uncertain at this stage.* The site is 129m from the nearest AONB (Wye Valley).
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (flood zone 2 and 3).*
		+	*The site does not intersect with a high surface flood risk area (flood zone 2 and 3).*

CS0111 – Land adjacent to Thistledown Barn

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	-	*The site has poor access to existing employment (>1,600m from an employment centre).* The site is 5-6km from the nearest protected employment site (Station Road, School Hill, Job Centre, Newhouse Farm and Bulwark Road, all in Chepstow).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	+	*The site has capacity to deliver new homes (<100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 15 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	+	*The site is within reasonable walking distance (≤800m) to a primary or a secondary school (≤1,600m).* The site is 700-800m from the nearest primary school (Shirenewton Primary); however, it is 5-6km from the nearest secondary school (Chepstow Comprehensive and Mounton House Special School).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	*The site is within 800m of a health service or an active travel route.* The site is not within 800m of a health service; however, it is 1m from the nearest National Cycle Network route.
		++	*The site is within 800m of a formal leisure and green space.* The site is 400-500m from the nearest area of amenity importance and 300-400m from the nearest green space (religious grounds).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Shirenewton LSOA, which is amongst the 10-20% least deprived LSOAs in Wales.

ISA topic	ISA objective	Significant effect?	Commentary
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 100-200m from the nearest bus stop (Tan House) and 1m from the nearest National Cycle Network route. It is also 162m from the nearest PRoW. However, it is not within reasonable walking distance to a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 165m from the nearest waterbody (river) and falls wholly within the River Wye Catchment Area.
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.
		+	*The site does not intersect with a mineral safeguarding area.*
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site is 123m from the nearest priority habitat (purple moor grass and rush pastures), 136m from the nearest SINC (Shirenewton Meadows), 554m from the nearest SAC (Wye Valley and Forest of Dean Bat Sites/ Safleoedd Ystlumod Dyffryn Gwy a Fforest y Ddena), 554m from the nearest SSSI (Mwyngloddfa Mynydd-Bach), and 622m from the nearest area of ancient woodland
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	-	*Development at the site has the potential for a negative effect on the historic environment.* The site is 169m from the nearest conservation area (Shirenewton) and 240m from the nearest grade II listed building. The site is relatively small (1.3ha) and partially screened by existing development. However, it still has the potential to impact the setting of the conservation area to the west, as well as several grade II listed buildings within it.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	?	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park; however, the site is either adjacent to/ within close proximity to one of these designated landscapes, and/ or the scale of development proposed (≥ 100 dwellings) on greenfield land has the potential for a negative effect. This is uncertain at this stage.* The site is 493m from the nearest AONB (Wye Valley).
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (flood zone 2 and 3).*
		+	*The site does not intersect with a high surface flood risk area (flood zone 2 and 3).*

CS0208 – Land west of Shirenewton Recreation Hall

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	-	*The site has poor access to existing employment (>1,600m from an employment centre).* The site is 6-7km from the nearest protected employment site (Severn Bridge in Caldicot, and Bulwark Road, Newhouse Farm, School Hill, Job Centre and Station Road, all in Chepstow).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	+	*The site has capacity to deliver new homes (<100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 35 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	-	*The site is not within reasonable walking distance (≤800m) to a primary or a secondary school (≤1,600m).* The site is 800-900m from the nearest primary school (Shirenewton Primary) and 6-7km from the nearest secondary school (Chepstow Comprehensive and Mounton House Special School).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	*The site is within 800m of a health service or an active travel route.* The site is not within 800m of a health service; however, it is 3m from the nearest National Cycle Network route.
		++	*The site is within 800m of a formal leisure and green space.* The site is 0-50m from the nearest area of amenity importance and green space (playing field and play space).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Shirenewton LSOA, which is amongst the 10-20% least deprived LSOAs in Wales.

ISA topic	ISA objective	Significant effect?	Commentary
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 200-300m from the nearest bus stop (Tredegar Arms) and 3m from the nearest National Cycle Network route. It is also 66m from the nearest PRoW. However, it is not within reasonable walking distance to a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 581m from the nearest waterbody (river) and the northern boundary of the site falls within the River Wye Catchment Area.
		-	*The site intersects with a Groundwater Source Protection Zone (SPZ).* The site is within SPZ 3.
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.
		--	*The site intersects with a mineral safeguarding area.* The site intersects with a mineral safeguarding area for carboniferous limestone.

ISA topic	ISA objective	Significant effect?	Commentary
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.* The site is 304m from the nearest SINC (Shirenewton Meadows), 325m from the nearest priority habitat (lowland meadows), 341m from the nearest area of ancient woodland, 868m from the nearest SSSI (Llwyn y Celyn Wetland), and 920m from the nearest SAC (Wye Valley and Forest of Dean Bat Sites/ Safleoedd Ystlumod Dyffryn Gwy a Fforest y Ddena).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	--	*Development at the site has the potential for a significant negative effect on the historic environment.* The eastern boundary of the site intersects with a conservation area (Shirenewton) (3% overlap). In addition, the site is 267m from the nearest grade II listed building. The site is relatively small (2ha) and the eastern boundary of the site is screened by trees. Nevertheless, it is still likely to impact the setting of the conservation area.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	?	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park; however, the site is either adjacent to/ within close proximity to one of these designated landscapes, and/ or the scale of development proposed (≥ 100 dwellings) on greenfield land has the potential for a negative effect. This is uncertain at this stage.* The site is 435m from the nearest AONB (Wye Valley).
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (flood zone 2 and 3).*

ISA topic	ISA objective	Significant effect?	Commentary
		+	*The site does not intersect with a high surface flood risk area (flood zone 2 and 3).*

CS0240 – Land to the east of Mounton Court

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	-	*The site has poor access to existing employment (>1,600m from an employment centre).* The site is 5-6km from the nearest protected employment site (Bulwark Road, Job Centre, Newhouse Farm, School Hill and Station Road, all in Chepstow).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	+	*The site has capacity to deliver new homes (<100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 8 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	+	*The site is within reasonable walking distance (≤800m) to a primary or a secondary school (≤1,600m).* The site is 700-800m from the nearest primary school (Shirenewton Primary); however, it is 5-6km from the nearest secondary school (Chepstow Comprehensive and Mounton House Special School).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	*The site is within 800m of a health service or an active travel route.* The site is not within 800m of a health service; however, it is 3m from the nearest National Cycle Network route.
		++	*The site is within 800m of a formal leisure and green space.* The site is 400-500m from the nearest area of amenity importance and 300-400m from the nearest green space (religious grounds).

ISA topic	ISA objective	Significant effect?	Commentary
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Shirenewton LSOA, which is amongst the 10-20% least deprived LSOAs in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 100-200m from the nearest bus stop (Tan House) and 3m from the nearest National Cycle Network route. It is also 128m from the nearest PRoW. However, it is not within reasonable walking distance to a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 122m from the nearest waterbody (river) and falls wholly within the River Wye Catchment Area.
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.
		+	*The site does not intersect with a mineral safeguarding area.*

ISA topic	ISA objective	Significant effect?	Commentary
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.* The site is 86m from the nearest priority habitat (purple moor grass and rush pastures), 95m from the nearest SINC (Shirenewton Meadows), 519m from the nearest SAC (Wye Valley and Forest of Dean Bat Sites/ Safleoedd Ystlumod Dyffryn Gwy a Fforest y Ddena), 519m from the nearest SSSI (Mwyngloddfa Mynydd-Bach), and 620m from the nearest area of ancient woodland
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	?	*Development at the site would have an uncertain effect on the historic environment.* The site is 212m from the nearest conservation area (Shirenewton) and 296m from the nearest grade II listed building. The site is small (0.3ha) and screened by existing development. Nevertheless, uncertainty is noted at this stage.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	?	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park; however, the site is either adjacent to/ within close proximity to one of these designated landscapes, and/ or the scale of development proposed (≥ 100 dwellings) on greenfield land has the potential for a negative effect. This is uncertain at this stage.* The site is 470m from the nearest AONB (Wye Valley).
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (flood zone 2 and 3).*
		+	*The site does not intersect with a high surface flood risk area (flood zone 2 and 3).*

CS0231 – Land west of Shirenewton Recreation Hall (smaller site)

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	-	*The site has poor access to existing employment (>1,600m from an employment centre).* The site is 6-7km from the nearest protected employment site (School Hill, Bulwark Road, Newhouse Farm, Job Centre and Station Road, all in Chepstow, and Severn Bridge in Caldicot).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	+	*The site has capacity to deliver new homes (<100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 9 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	-	*The site is not within reasonable walking distance (≤800m) to a primary or a secondary school (≤1,600m).* The site is 800-900m from the nearest primary school (Shirenewton Primary) and 6-7km from the nearest secondary school (Chepstow Comprehensive and Mounton House Special School).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	*The site is within 800m of a health service or an active travel route.* The site is not within 800m of a health service; however, it is 3m from the nearest National Cycle Network route.
		++	*The site is within 800m of a formal leisure and green space.* The site is 0-50m from the nearest area of amenity importance and green space (playing field and play space).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Shirenewton LSOA, which is amongst the 10-20% least deprived LSOAs in Wales.

ISA topic	ISA objective	Significant effect?	Commentary
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 200-300m from the nearest bus stop (Tredegar Arms) and 3m from the nearest National Cycle Network route. It is also 66m from the nearest PRoW. However, it is not within reasonable walking distance to a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 581m from the nearest waterbody (river) and the northern boundary of the site falls within the River Wye Catchment Area.
		-	*The site intersects with a Groundwater Source Protection Zone (SPZ).* The site is within SPZ 3.
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.
		+	*The site does not intersect with a mineral safeguarding area.*
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site is 304m from the nearest SINC (Shirenewton Meadows), 325m from the nearest priority habitat (lowland meadows), 341m from the nearest area of ancient woodland, 868m from the nearest SSSI (Llwyn y Celyn Wetland), and 920m from the nearest SAC (Wye Valley and Forest of Dean Bat Sites/ Safleoedd Ystlumod Dyffryn Gwy a Fforest y Ddena).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	--	*Development at the site has the potential for a significant negative effect on the historic environment.* The eastern boundary of the site intersects with a conservation area (Shirenewton) (3% overlap). In addition, the site is 268m from the nearest grade II listed building. The site is small (0.9ha) and the eastern boundary of the site is screened by trees. Nevertheless, it is still likely to impact the setting of the conservation area.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	?	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park; however, the site is either adjacent to/ within close proximity to one of these designated landscapes, and/ or the scale of development proposed (≥ 100 dwellings) on greenfield land has the potential for a negative effect. This is uncertain at this stage.* The site is 435m from the nearest AONB (Wye Valley).
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (flood zone 2 and 3).*
		+	*The site does not intersect with a high surface flood risk area (flood zone 2 and 3).*

CS0232 – Land west of Redd Landes

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	-	*The site has poor access to existing employment (>1,600m from an employment centre).* The site is 6-7km from the nearest protected employment site (Newhouse Farm, School Hill, Station Road, Bulwark Road and Job Centre, all in Chepstow, and Severn Bridge in Caldicot).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	+	*The site has capacity to deliver new homes (<100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 25 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	+	*The site is not within reasonable walking distance (≤800m) to a primary or a secondary school (≤1,600m).* The site is 200-300m from the nearest primary school (Shirenewton Primary) and 5-6km from the nearest secondary school (Mounton House Special School).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	*The site is within 800m of a health service or an active travel route.* The site is not within 800m of a health service; however, it intersects with a PRoW (380/42/1).
		++	*The site is within 800m of a formal leisure and green space.* The site is 0-50m from the nearest area of amenity importance and green space (playing field, play space and tennis court).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Shirenewton LSOA, which is amongst the 10-20% least deprived LSOAs in Wales.

ISA topic	ISA objective	Significant effect?	Commentary
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 200-300m from the nearest bus stop (Tredegar Arms) and it intersects with a PRoW (380/42/1). It is also 3m from the nearest National Cycle Network route. However, it is not within reasonable walking distance to a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 476m from the nearest waterbody (river) and it falls wholly within the River Wye Catchment Area.
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.
		+	*The site does not intersect with a mineral safeguarding area.*
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site is 8m from the nearest SINC (Mynydd-Bach Meadows), 24m from the nearest priority habitat (traditional orchard), 24m from the nearest area of ancient woodland, 499m from the nearest SSSI (Llwyn y Celyn Wetland), and 648m from the nearest SAC (Wye Valley and Forest of Dean Bat Sites/ Safleoedd Ystlumod Dyffryn Gwy a Fforest y Ddena).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	--	*Development at the site has the potential for a significant negative effect on the historic environment.* The southeastern boundary of the site is adjacent to a conservation area (Shirenewton). In addition, the site is 245m from the nearest grade II listed building. The site is relatively large (4.2ha), and whilst the southeastern boundary of the site is screened by a hedgerow, the site is still likely to impact the setting of the conservation area.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	?	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park; however, the site is either adjacent to/ within close proximity to one of these designated landscapes, and/ or the scale of development proposed (≥ 100 dwellings) on greenfield land has the potential for a negative effect. This is uncertain at this stage.* The site is 73m from the nearest AONB (Wye Valley).
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (flood zone 2 and 3).*
		+	*The site does not intersect with a high surface flood risk area (flood zone 2 and 3).*

CS0244 – Land off Ditch Hall Lane

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	-	*The site has poor access to existing employment (>1,600m from an employment centre).* The site is 6-7km from the nearest protected employment site (Severn Bridge, Caldicot, Newhouse Farm, Chepstow, School Hill, Chepstow, Station Road, Chepstow, Bulwark Road, Chepstow, Job Centre, Chepstow).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	+	*The site has capacity to deliver new homes (<100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 30 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	+	*The site is within reasonable walking distance (≤800m) to a primary or a secondary school (≤1,600m).* The site is 100-200m from the nearest primary school (Shirenewton Primary); however, it is 5-6km from the nearest secondary school (Mounton House Special School).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	*The site is within 800m of a health service or an active travel route.* The site is not within 800m of a health service; however, it intersects with a PRoW (380/42/1).
		++	*The site is within 800m of a formal leisure and green space.* The site is 300-400m from the nearest area of amenity importance and 200-300m from the nearest green space (cemetery).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Shirenewton LSOA, which is amongst the 10-20% least deprived LSOAs in Wales.

ISA topic	ISA objective	Significant effect?	Commentary
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 300-400m from the nearest bus stop (Tredegar Arms) and it intersects with a PRoW (380/42/1). It is also 185m from the nearest National Cycle Network route. However, it is not within reasonable walking distance to a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 367m from the nearest waterbody (river) and it falls wholly within the River Wye Catchment Area.
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.
		+	*The site does not intersect with a mineral safeguarding area.*
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	--	*The site intersects or is adjacent to an internationally (SAC, SPA, Ramsar) or nationally (SSSI, Ancient Woodland, NNRs) designated site.*

ISA topic	ISA objective	Significant effect?	Commentary
			The northern boundary of the site is adjacent to an area of ancient woodland and a priority habitat (traditional orchard). In addition, the site is 6m from the nearest SINC (Mynydd-Bach Meadows), 482m from the nearest SSSI (Llwyn y Celyn Wetland), and 633m from the nearest SAC (Wye Valley and Forest of Dean Bat Sites/ Safleoedd Ystlumod Dyffryn Gwy a Fforest y Ddena).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	--	*Development at the site has the potential for a significant negative effect on the historic environment.* The southern boundary of the site intersects with a conservation area (Shirenewton) (1% overlap). In addition, the site is 304m from the nearest grade II listed building. The site is relatively small (2ha), and whilst the southern boundary of the site is screened by trees, the site is still likely to impact the setting of the conservation area.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	?	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park; however, the site is either adjacent to/ within close proximity to one of these designated landscapes, and/ or the scale of development proposed (≥ 100 dwellings) on greenfield land has the potential for a negative effect. This is uncertain at this stage.* The site is 54m from the nearest AONB (Wye Valley).
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (flood zone 2 and 3).*
		+	*The site does not intersect with a high surface flood risk area (flood zone 2 and 3).*

Tourism (Hotel)

CS0223 – Land at New Barn Workshop

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	++	*New employment land proposed at the site.* The site is proposed for tourism (hotel).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	0	*The site will deliver new employment land.*
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	0	*N/A*
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	0	*N/A*
		0	*N/A*
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the St. Arvans LSOA, which is amongst the 20-30% least deprived LSOAs in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	0	*N/A*
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 414m from the nearest waterbody (river) and falls wholly within the River Wye Catchment Area.

ISA topic	ISA objective	Significant effect?	Commentary
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	-	*The site is predominantly greenfield land (>50%) and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is vacant land.
		--	*The site is within a mineral safeguarding area.* The site is within a mineral safeguarding area for limestone.
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.* The site is 96m from the nearest area of ancient woodland, 108m from the nearest SINC (Mistletoe Cottage), 163m from the nearest SAC (Wye Valley Woodlands/ Coetiroedd Dyffryn Gwy), 163m from the nearest SSSI (Pierce, Alcove and Piercefield Woods), and 501m from the nearest priority habitat (parkland).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	-	*Development at the site has the potential for a negative effect on the historic environment.* The site is 57m from the nearest conservation area (St. Arvans), 142m from the nearest grade II listed building, 297m from the nearest scheduled monument (St Arvan's Church Cross-slab), and 574m from the nearest grade II* listed building. The site is small (0.8ha) and well screened by trees, and the nearest listed buildings are screened by existing development. Nevertheless, the site still has the potential to impact the setting of the conservation area.

ISA topic	ISA objective	Significant effect?	Commentary
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	--	*The site is predominantly greenfield and wholly falls within an Area of Outstanding Natural Beauty, National Park or Country Park.* The site wholly falls within an AONB (Wye Valley).
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (flood zone 2 and 3).*
		+	*The site does not intersect with a high surface flood risk area (flood zone 2 and 3).*

Tourism (Hotel) and Renewable Energy (Solar)

CCS0229 – Land opposite Chepstow Garden Centre

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	++	*New employment land proposed at the site.* The site is proposed for mixed-use, including tourism (hotel) and renewable energy (solar).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	0	*The site will deliver new employment land.*
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	0	*N/A*
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	0	*N/A*
		0	*N/A*
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site falls within the Shirenewton LSOA, which is amongst the 10-20% least deprived LSOAs in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	0	*N/A*
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is adjacent to a river (Mounton Brook) and falls wholly within the River Wye Catchment Area.
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.
		--	*The site is within a mineral safeguarding area.* The site is within a mineral safeguarding area for sand and gravel.
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	-	*The site intersects or is adjacent to a regionally or locally (LNRs and SINCs) designated site and/ or priority habitats/ species.* The southeastern extent of the site contains a SINC (Mathern Mill) (10% overlap) and a priority habitat (purple moor grass and rush pastures) (7% overlap). In addition, the site is 571m from the nearest area of ancient woodland.

ISA topic	ISA objective	Significant effect?	Commentary
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	--	*Development at the site has the potential for a significant negative effect on the historic environment.* The site is 40m from the nearest grade II* listed building, 147m from the nearest grade II listed building, 195m from the nearest conservation area (Mathern), 410m from the nearest archaeologically sensitive area, and 834m from the nearest scheduled monument (Moated site south of Moynes Court). The site is large (13.7ha), and given its proximity to several heritage assets, particularly the grade II* listed building, it is likely to impact their setting. However, it is recognised that the impact of this site on the historic environment may be lreduced due to the nature of its use (tourism and renewable energy).
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	?	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park; however, the site is either adjacent to/ within close proximity to one of these designated landscapes, and/ or the scale of development proposed (≥ 100 dwellings) on greenfield land has the potential for a negative effect. This is uncertain at this stage.* The site is 539m from the nearest AONB (Wye Valley).
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	-	*The site intersects with fluvial flood zone 2 or 3.* Less than 50% of the site intersects with fluvial Flood Zone 2 or 3. However, it is recognised that this is isolated to the eastern extent of the site.
		-	*The site intersects with surface water flood zone 2 or 3.* Less than 50% of the site intersects with surface water Flood Zone 2 or 3. However, it is recognised that this is isolated to the eastern extent of the site.

Tourism / Leisure

CS0003 – Livox Quarry

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	++	*New employment land proposed at the site.* The site is proposed for tourism/ leisure.
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	0	*The site will deliver new employment land.*
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	0	*N/A*
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	0	*N/A*
		0	*N/A*
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the St. Arvans LSOA, which is amongst the 20-30% least deprived LSOAs in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	0	*N/A*
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is adjacent to the nearest waterbody (coast) and falls almost wholly within the River Wye Catchment Area.

ISA topic	ISA objective	Significant effect?	Commentary
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	++	*The site is wholly brownfield land.* The site is a former mineral quarry.
		--	*The site is within a mineral safeguarding area.* The site is within a mineral safeguarding area for carboniferous limestone.
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	--	*The site intersects or is adjacent to an internationally (SAC, SPA, Ramsar) or nationally (SSSI, Ancient Woodland, NNRs) designated site.* The site intersects with an area of ancient woodland (54% overlap), an SAC (River Wye/ Afon Gwy and Wye Valley Woodlands/ Coetiroedd Dyffryn Gwy) (41% overlap) and an SSSI (Blackcliff – Wyndcliff and River Wye (Lower Wye)/ Afon Gwy (Gwy Isaf)) (41% overlap). It is also 48m from the nearest priority habitat (Mudflats) and 244m from the nearest SINC (Minepit Wood). Whilst it is recognised that the site is brownfield land and there is be an opportunity to deliver net gain, this will depend on the precise nature of the tourism/ leisure use of the site.
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	--	*Development at the site has the potential for a significant negative effect on the historic environment.* The site almost wholly intersects with a registered historic landscape (The Lower Wye Valley). In addition, the site intersects with a scheduled monument (Blackcliff Wood Limekiln). The site is also

ISA topic	ISA objective	Significant effect?	Commentary
			520m from the nearest grade II listed building, 782m from the nearest conservation area (Tintern), and 804m from the nearest archaeologically sensitive area. The site is very large (51ha); however, as it is proposed for tourism/ leisure use, any impact it has on the historic environment is less likely to be severe. Nevertheless, the site is still likely to impact the setting of the registered historic landscape, and it has the potential to disturb archaeological remains (scheduled monument).
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	--	*The site is predominantly greenfield and wholly falls within an Area of Outstanding Natural Beauty, National Park or Country Park.* The site wholly falls within an AONB (Wye Valley).
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	-	*The site intersects with fluvial flood zone 2 or 3.* Less than 50% of the site intersects with fluvial Flood Zone 2 or 3. However, it is recognised that this is concentrated in the southern tip of the site, as well as along the eastern boundary.
		-	*The site intersects with surface water flood zone 2 or 3.* Less than 50% of the site intersects with surface water Flood Zone 2 or 3. However, it is recognised that this is concentrated in the southern tip of the site, as well as along the eastern boundary.

Employment

CS0077 – Land adjacent to Piercefield Public House

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	-	*The site has poor access to existing employment (>1,600m from an employment centre).* The site is 3-4km from the nearest protected employment site (Job Centre, Station Road and School Hill).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	+	*The site has capacity to deliver new homes (<100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 16 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	--	*The site is >1,600m from a primary school and secondary school.* The site is 2.5-3km from the nearest primary school (The Dell Primary) and 2-2.5km from the nearest secondary school (Chepstow Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	*The site is within 800m of a health service or an active travel route.* The site is not within 800m of a health service; however, it is 7m from the nearest National Cycle Network route.
		++	*The site is within 800m of a formal leisure and green space.* The site is 100-200m from the nearest area of amenity importance and green space (playing field).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the St. Arvans LSOA, which is amongst the 20-30% least deprived LSOAs in Wales.

ISA topic	ISA objective	Significant effect?	Commentary
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 0-50m from the nearest bus stop (Piercefield) and 7m from the nearest National Cycle Network route. It is also 8m from the nearest PRoW. However, it is not within reasonable walking distance to a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 34m from the nearest waterbody (river) and falls wholly within the River Wye Catchment Area.
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.
		--	*The site is within a mineral safeguarding area.* The site is within a mineral safeguarding area for carboniferous limestone.

ISA topic	ISA objective	Significant effect?	Commentary
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.* The site is 177m from the nearest priority habitat (parkland), 458m from the nearest area of ancient woodland, 486m from the nearest SINC (Mistletoe Cottage), 495m from the nearest SAC (Wye Valley Woodlands/ Coetiroedd Dyffryn Gwy), and 495m from the nearest SSSI (Pierce, Alcove and Piercefield Woods).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	--	*Development at the site has the potential for a significant negative effect on the historic environment.* The site is 3m from the nearest conservation area (St. Arvans), 15m from the nearest grade II listed building, 261m from the nearest scheduled monument (St Arvan's Church Cross-slab), and 907m from the nearest grade II* listed building. The site is small (1.1ha) and well screened by trees. However, given its proximity to the conservation area and grade II listed building, it is likely to impact their setting.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	--	*The site is predominantly greenfield and wholly falls within an Area of Outstanding Natural Beauty, National Park or Country Park.* The site wholly falls within an AONB (Wye Valley).
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (flood zone 2 and 3).*
		-	*The site intersects with surface water flood zone 2 or 3.* Less than 50% of the site intersects with surface water Flood Zone 2 or 3.

St Kingsmark

Mixed Use: Residential (C3)

CS0165 – Land at Mounton Road

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	++	*New employment land proposed at the site.* The site is proposed for mixed-use (including C3).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	--	*The site could deliver new homes or employment land; however, the site wholly intersects with a designated green wedge.* The site has capacity to deliver 210 new homes; however, it wholly intersects with a designated green wedge.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	++	*The site is within reasonable walking distance (≤800m) to a primary and a secondary school (≤1,600m).* The site is 700-800m from the nearest primary school (St Mary's Roman Catholic Primary) and 1,200-1,300m from the nearest secondary school (Chepstow Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	++	*The site is within 800m of a health service and an active travel route.* The site is 300-400m from the nearest dentist (Oasis Dental Care, Chepstow), GP surgery (Mount Pleasant Practice and Tower Gate Practice, both in Chepstow) and hospital (Chepstow Community Hospital, Chepstow). It is also adjacent to a National Cycle Network route and 13m from the nearest PRoW.
		++	*The site is within 800m of a formal leisure and green space.* The site is 300-400m from the nearest area of amenity importance and 400-500m from the nearest green space (playing field).

ISA topic	ISA objective	Significant effect?	Commentary
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the St. Kingsmark 2 LSOA, which is amongst the 10% least deprived LSOAs in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	++	*The site is within close proximity (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, and an active travel route.* The site is 0-50m from the nearest bus stop (Chepstow Community Hospital), 600-700m from the nearest central shopping area (Chepstow), and adjacent to a National Cycle Network route and 13m from the nearest PRoW.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 785m from the nearest waterbody (river) and falls wholly within the River Wye Catchment Area.
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.
		--	*The site is within a mineral safeguarding area.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site is within a mineral safeguarding area for limestone.
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	--	*The site intersects or is adjacent to an internationally (SAC, SPA, Ramsar) or nationally (SSSI, Ancient Woodland, NNRs) designated site.* The northern boundary of the site is adjacent to an area of ancient woodland. In addition, the site is 219m from the nearest priority habitat (parkland), 304m from the nearest SINC (Parc Penterry Meadow), 826m from the nearest SAC (Wye Valley Woodlands/ Coetiroedd Dyffryn Gwy), and 826m from the nearest SSSI (Pierce, Alcove And Piercefield Woods).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	--	*Development at the site has the potential for a significant negative effect on the historic environment.* The southern tip of the site is adjacent to a conservation area (Mathern). In addition, the site is 31m from the nearest grade II listed building, 648m from the nearest archaeologically sensitive area, 742m from the nearest scheduled monument (Bishop Barnet's Wood Camp), 754m from the nearest grade II* listed building, and 810m from the nearest grade I listed building. The site is very large (12.8ha), and whilst there is some screening from trees along the boundary of the site, it is still likely to impact the setting of the conservation area to the south and the nearest grade II listed building to the north.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	?	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park; however, the site is either adjacent to/ within close proximity to one of these designated landscapes, and/ or the scale of development proposed (≥ 100 dwellings) on greenfield land has the potential for a negative effect. This is uncertain at this stage.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site is 183m from the nearest AONB (Wye Valley) and will deliver 210 homes on agricultural land.
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (flood zone 2 and 3).*
		+	*The site does not intersect with a high surface flood risk area (flood zone 2 and 3).*

St Kingsmark / Shirenewton

Residential

SS0098 – Bayfield

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	0	*The site has reasonable access to existing employment (800-1,600m from an employment centre).* The site is 1,400-1,500m from the nearest protected employment site (School Hill, Chepstow).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	++	*The site has capacity to deliver a significant number of new homes (≥ 100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 145 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	+	*The site is within reasonable walking distance (≤800m) to a primary or a secondary school (≤1,600m).*

ISA topic	ISA objective	Significant effect?	Commentary
			The site is 1,000-1,100m from the nearest primary school (The Dell Primary); however, it is 700-800m from the nearest secondary school (Chepstow Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	*The site is within 800m of a health service or an active travel route.* The site is not within 800m of a health service; however, it intersects with four PRoWs (355/4/3, 355/4/4, 355/16/1 and 373/75/1).
		++	*The site is within 800m of a formal leisure and green space.* The site is 0-50m from the nearest area of amenity importance and green space (play space).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the St. Kingsmark 2 and Shirenewton LSOAs, which are amongst the 10% and 10-20% least deprived LSOAs in Wales respectively.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 100-200m from the nearest bus stop (Owls Nest and Kingsmark Lane) and it intersects with four PRoWs (355/4/3, 355/4/4, 355/16/1 and 373/75/1). It is also 236m from the nearest National Cycle Network route. However, it is not within reasonable walking distance to a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*

ISA topic	ISA objective	Significant effect?	Commentary
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 661m from the nearest waterbody (coast) and falls wholly within the River Wye Catchment Area.
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.
		--	*The site intersects with a mineral safeguarding area.* The site intersects a mineral safeguarding area for carboniferous limestone.
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	--	*The site intersects or is adjacent to an internationally (SAC, SPA, Ramsar) or nationally (SSSI, Ancient Woodland, NNRs) designated site.* The northern tip of the site intersects with a SINC (Crossways Green 2) (8% overlap). In addition, the northwestern boundary of the site is adjacent to an area of ancient woodland. The site is also 248m from the nearest priority habitat (traditional orchard) and 566m from the nearest SAC (Wye Valley Woodlands/ Coetiroedd Dyffryn Gwy) and SSSI (Pierce, Alcove And Piercefield Woods).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets.	--	*Development at the site has the potential for a significant negative effect on the historic environment.*

ISA topic	ISA objective	Significant effect?	Commentary
	Promote understanding of Monmouthshire's cultural heritage.		The site is 29m from the nearest scheduled monument (Bishop Barnet's Wood Camp), 263m from the nearest grade II listed building, 525m from the nearest conservation area (Chepstow), 714m from the nearest archaeologically sensitive area, and 953m from the nearest grade I listed building. The site is large (10.7ha), and due to its proximity to the scheduled monument, it is likely to disturb nearby archaeological remains. However, it is screened from the remaining heritage assets by existing development.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	?	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park; however, the site is either adjacent to/ within close proximity to one of these designated landscapes, and/ or the scale of development proposed (≥ 100 dwellings) on greenfield land has the potential for a negative effect. This is uncertain at this stage.* The northern and western boundaries of the site are adjacent to an AONB (Wye Valley) and the site will deliver 145 homes on agricultural land.
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (flood zone 2 and 3).*
		+	*The site does not intersect with a high surface flood risk area (flood zone 2 and 3).*

The Elms

Residential

CS0211 – Land at Rockfield Farm

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	-	*The site has poor access to existing employment (>1,600m from an employment centre).* The site is 2.5-3km from the nearest protected employment site (Cheeseman's Industrial Estate and Progress Industrial Estate, both in Rogiet, and Magor Brewery in Magor).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	+	*The site has capacity to deliver new homes (<100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 19 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	-	*The site is not within reasonable walking distance (≤800m) to a primary or a secondary school (≤1,600m).* The site is 1,400-1,500m from the nearest primary school (Undy Primary) and 4-5km from the nearest secondary school (Caldicot Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	*The site is within 800m of a health service or an active travel route.* The site is not within 800m of a health service; however, it is 88m from the nearest PRoW.
		++	*The site is within 800m of a formal leisure and green space.* The site is 200-300m from the nearest area of amenity importance and 100-200m from the nearest green space (allotments or community growing spaces).

ISA topic	ISA objective	Significant effect?	Commentary
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within The Elms LSOA, which is amongst the 10% least deprived LSOAs in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 400-500m from the nearest bus stop (Rockfield) and 88m from the nearest PRoW. It is also 707m from the nearest National Cycle Network route. However, it is not within reasonable walking distance to a neighbourhood centre or central shopping area.
atural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	0	*The site does not contain and is not in close proximity to a waterbody, nor does it fall within the River Wye Catchment Area.*
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.
		--	The site is within a mineral safeguarding area. The site is within a mineral safeguarding area for limestone.

ISA topic	ISA objective	Significant effect?	Commentary
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.* The site is 49m from the nearest SINC (Breezy Bank to Rockfield Farm), 340m from the nearest priority habitat (traditional orchard), 403m from the nearest area of ancient woodland, and 735m from the nearest SSSI (Gwent Levels – Magor and Under).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	0	*Development at this site will have a neutral effect on the historic environment.* The site is 283m from the nearest archaeologically sensitive area, 293m from the nearest scheduled monument (Medieval moated site 400m north of Undy Church), 542m from the nearest conservation area (Rogiet), and 618m from the nearest grade II listed building. The size is relatively small (2.2ha) and relatively far away from the aforementioned heritage assets. In addition, it is sandwiched by the M48 to the north and existing development to the south. Therefore, neutral effects are anticipated.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	+	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park.*
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (flood zone 2 and 3).*
			The site intersects with surface water flood zone 2 or 3. Less than 50% of the site intersects with surface water Flood Zone 2 or 3. However, it is recognised that this is isolated to the northwestern extent of the site.

Thornwell

Mixed Use: Hotel (C1), Employment (B1 / B2 / B8)

CS0260 – Land south of Junction 2, M48 (Option 1: Hotel and Employment)

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	++	*New employment land proposed at the site.* The site is proposed for mixed-use, including a hotel (C1) and employment use (B1/ B2/ B8).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	0	*The site will deliver new employment land.*
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	0	*N/A*
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	0	*N/A*
		0	*N/A*
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Thornwell 2 LSOA, which is amongst the 40-50% least deprived LSOAs in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	0	*N/A*
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*

ISA topic	ISA objective	Significant effect?	Commentary
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 78m from the nearest waterbody (river) and falls wholly within the River Wye Catchment Area.
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site comprises vacant land.
		--	*The site intersects with a mineral safeguarding area.* The site intersects with a mineral safeguarding area for carboniferous limestone.
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.* The site is 227m from the nearest priority habitat (parkland), 380m from the nearest area of ancient woodland, 569m from the nearest SAC, SPA, Ramsar site and SSSI (Severn Estuary), and 685m from the nearest SINC (Parc Redding and Warren Slade).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	--	*Development at the site has the potential for a significant negative effect on the historic environment.* The site almost wholly intersects with an archaeologically sensitive area (97% overlap). In addition, the site is 70m from the nearest conservation area (Mathern), 358m from the nearest scheduled

ISA topic	ISA objective	Significant effect?	Commentary
			monument (Long Barrow and Round Barrow at Thornwell Farm), 636m from the nearest grade II listed building, 800m from the nearest grade II* listed building, and 901m from the nearest grade I listed building. The site is relatively large (6.7ha) and is therefore likely to disturb a large area of on-site archaeological remains. The site also has the potential to impact the setting of the conservation area to the northwest; however, it is recognised that the M48 provides a degree of separation.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	+	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park.*
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (flood zone 2 and 3).*
		-	*The site intersects with surface water flood zone 2 or 3.* Less than 50% of the site intersects with surface water Flood Zone 2 or 3. However, it is recognised that this is isolated to two small areas within the site.

Mixed Use: Petrol Station (Sui Generis), Drive-Thru (A1 / A3), Employment (B1 / B2 / B8)

CS0261 - Land south of Junction 2, M48 (Option 2: Petrol Station, Drive-Thru and Employment)

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	++	*New employment land proposed at the site.* The site is proposed for mixed-use, including a petrol station, a drive-thru and employment use.

ISA topic	ISA objective	Significant effect?	Commentary
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	0	*The site will deliver new employment land.*
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	0	*N/A*
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	0	*N/A*
		0	*N/A*
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* Not classified as deprived or relatively deprived (3rd quintile). The site falls within the Thornwell 2 LSOA, which is amongst the 40-50% least deprived LSOAs in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	0	*N/A*
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 78m from the nearest waterbody (river) and falls wholly within the River Wye Catchment Area.
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*

ISA topic	ISA objective	Significant effect?	Commentary
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site comprises vacant land.
		--	*The site intersects with a mineral safeguarding area.* The site intersects with a mineral safeguarding area for carboniferous limestone.
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.* The site is 227m from the nearest priority habitat (parkland), 380m from the nearest area of ancient woodland, 569m from the nearest SAC, SPA, Ramsar site and SSSI (Severn Estuary), and 685m from the nearest SINC (Parc Redding and Warren Slade).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	--	*Development at the site has the potential for a significant negative effect on the historic environment.* The site almost wholly intersects with an archaeologically sensitive area (97% overlap). In addition, the site is 70m from the nearest conservation area (Mathern), 358m from the nearest scheduled monument (Long Barrow and Round Barrow at Thornwell Farm), 636m from the nearest grade II listed building, 800m from the nearest grade II* listed building, and 901m from the nearest grade I listed building. The site is relatively small (2.5ha) but still has the potential to disturb a large area of on-site archaeological remains. The site also has the potential to impact the setting of the conservation area to the northwest; however, it is recognised that the M48 provides a degree of separation.

ISA topic	ISA objective	Significant effect?	Commentary
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	+	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park.*
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (flood zone 2 and 3).*
		-	*The site intersects with surface water flood zone 2 or 3.* Less than 50% of the site intersects with surface water Flood Zone 2 or 3. However, it is recognised that this is isolated to two small areas within the site.

Hotel (C1)

CCS0154 - Land to the north of M48

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	++	*New employment land proposed at the site.* The site is proposed for a hotel (C1).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	--	*The site could deliver new homes or employment land; however, the site wholly intersects with a designated green wedge.* The site delivers new employment land; however, it falls wholly within a designated green wedge.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	0	*N/A*
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	0	*N/A*

ISA topic	ISA objective	Significant effect?	Commentary
		0	*N/A*
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Thornwell 2 LSOA, which is amongst the 40-50% least deprived LSOAs in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	0	*N/A*
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 416m from the nearest waterbody (river) and falls wholly within the River Wye Catchment Area.
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site comprises vacant scrubland.
		--	*The site is within a mineral safeguarding area.* The site is within a mineral safeguarding area for limestone.

ISA topic	ISA objective	Significant effect?	Commentary
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.* The site is 178m from the nearest priority habitat (traditional orchard), 630m from the nearest area of ancient woodland, 669m from the nearest SINC (Parc Redding and Warren Slade), and 832m from the nearest SAC, SPA, Ramsar site and SSSI (Severn Estuary).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	--	*Development at the site has the potential for a significant negative effect on the historic environment.* The site is wholly within a conservation area (Mathern). In addition, the site is 81m from the nearest archaeologically sensitive area, 485m from the nearest scheduled monument (Long Barrow and Round Barrow at Thornwell Farm), 721m from the nearest grade II listed building, and 972m from the nearest grade II* listed building. The site is relatively small (1.8ha); however, it is still likely to impact the setting of the conservation area. Whilst the site is also near archaeological remains, development is unlikely to disturb these as the site is separated from them by the M48 to the south.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	+	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park.*
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (flood zone 2 and 3).*
		+	*The site does not intersect with a high surface flood risk area (flood zone 2 and 3).*

Trellech United

Residential

CS0047 – Land at Penallt

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	-	*The site has poor access to existing employment (>1,600m from an employment centre).* The site is 4-5km from the nearest protected employment site (Wonastow Road and Tri-Wall, both in Monmouth).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	+	*The site has capacity to deliver new homes (<100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 15-20 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	--	*The site is >1,600m from a primary school and secondary school.* The site is 4-5km from the nearest primary school (Trellech Primary) and 5-6km from the nearest secondary school (Monmouth Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	*The site is within 800m of a health service or an active travel route.* The site is not within 800m of a health service; however, it is 130m from the nearest PRoW.
		+	*The site is within 800m of a formal leisure or green space.* The site is not within 800m of an area of amenity importance; however, it is 100-200m from the nearest green space (playing field).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site falls within the Trellech United 2 LSOA, which is amongst the 20-30% least deprived LSOAs in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 100-200m from the nearest bus stop (Cross Vane and White House Farm) and 130m from the nearest PRoW. However, it is not within reasonable walking distance to a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 899m from the nearest waterbody (river) and falls wholly within the River Wye Catchment Area.
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.
		+	*The site does not intersect with a mineral safeguarding area.*
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site is 10m from the nearest SINC (Pelham Meadows), 131m from the nearest priority habitat (traditional orchard), 164m from the nearest ancient woodland, and 554m from the nearest SSSI (Pentwyn Farm Grasslands, Penallt).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	0	*Development at this site will have a neutral effect on the historic environment.* The site is 336m from the nearest grade II listed building and 523m from the nearest grade II* listed building. The site is relatively small (1.9ha) and is screened from the aforementioned heritage assets. Therefore, neutral effects are anticipated.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	--	*The site is predominantly greenfield and wholly falls within an Area of Outstanding Natural Beauty, National Park or Country Park.* The site wholly falls within an AONB (Wye Valley).
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (flood zone 2 and 3).*
		+	*The site does not intersect with a high surface flood risk area (flood zone 2 and 3).*

CS0092 – Land at Monmouth Road

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	-	*The site has poor access to existing employment (>1,600m from an employment centre).*

ISA topic	ISA objective	Significant effect?	Commentary
			The site is 7-8km from the nearest protected employment site (Wonastow Road and Tri-Wall, both in Monmouth).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	+	*The site has capacity to deliver new homes (<100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 30 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	+	*The site is within reasonable walking distance (≤800m) to a primary or a secondary school (≤1,600m).* The site is 300-400m from the nearest primary school (Trellech Primary); however, it is 8-9km from the nearest secondary school (Monmouth Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	++	*The site is within 800m of a health service and an active travel route.* The site is 300-400m from the nearest GP surgery (Trellech Surgery, Trellech) and 92m from the nearest PRoW.
		++	*The site is within 800m of a formal leisure and green space.* The site is 0-50m from the nearest area of amenity importance and 200-300m from the nearest green space (play space).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Trellech United 1 LSOA, which is amongst the 30-40% least deprived LSOAs in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 100-200m from the nearest bus stop (Primary School) and 92m from the nearest PRoW. However, it is not within

ISA topic	ISA objective	Significant effect?	Commentary
			reasonable walking distance to a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 181m from the nearest waterbody (river).
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.
		+	*The site does not intersect with a mineral safeguarding area.*
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.* The site is 20m from the nearest SINC (Wet Meadow, Trellech), 248m from the nearest priority habitat (traditional orchard), and 308m from the nearest area of ancient woodland.
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets.	?	*Development at the site would have an uncertain effect on the historic environment.* The site is 97m from the nearest archaeologically sensitive area, 106m from the nearest conservation area (Trellech), 163m from the

ISA topic	ISA objective	Significant effect?	Commentary
	Promote understanding of Monmouthshire's cultural heritage.		nearest grade II listed building, 171m from the nearest scheduled monument (Medieval house sites west of Trellech Church), and 239m from the nearest grade I listed building. The site is relatively small (1.7ha), and whilst it is near several heritage assets, these are all located on the other side of Trellech Primary School, which separates the site from the main settlement of Trellech to the south. Nevertheless, uncertainty is noted due to the potential for the site to disturb nearby archaeological remains.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	--	*The site is predominantly greenfield and wholly falls within an Area of Outstanding Natural Beauty, National Park or Country Park.* The site wholly falls within an AONB (Wye Valley).
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (flood zone 2 and 3).*
		+	*The site does not intersect with a high surface flood risk area (flood zone 2 and 3).*

CS0221 – Land at Penarth Farm (residential)

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	-	*The site has poor access to existing employment (>1,600m from an employment centre).* The site is 9-10km from the nearest protected employment site (Cuckoo's Row and Raglan Enterprise Park, both in Raglan).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	+	*The site has capacity to deliver new homes (<100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 6 new homes.

ISA topic	ISA objective	Significant effect?	Commentary
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	--	*The site is >1,600m from a primary school and secondary school.* The site is 3-4km from the nearest primary school (Trellech Primary) and 10-15km from the nearest secondary school (Monmouth Comprehensive, Chepstow Comprehensive and Mounton House Special School).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	*The site is within 800m of a health service or an active travel route.* The site is not within 800m of a health service; however, it is 52m from the nearest PRoW.
		++	*The site is within 800m of a formal leisure and green space.* The site is 50-100m from the nearest area of amenity importance and green space (play space).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Trellech United 1 LSOA, which is amongst the 30-40% least deprived LSOAs in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 100-200m from the nearest bus stop (Carpenters Arms) and 52m from the nearest PRoW. However, it is not within reasonable walking distance to a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*

ISA topic	ISA objective	Significant effect?	Commentary
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 512m from the nearest waterbody (river) and the eastern corner of the site falls within the River Wye Catchment Area.
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture (SAH11(ix)(b)).
		+	*The site does not intersect with a mineral safeguarding area.*
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.* The site is 112m from the nearest SINC (Rowan House Meadow), 291m from the nearest area of ancient woodland, and 341m from the nearest priority habitat (lowland meadows).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	0	*Development at this site will have a neutral effect on the historic environment.* The site is 922m from the nearest grade II* listed building, 950m from the nearest grade II listed building, and 918m from the nearest scheduled monument (Dovecot at Hygga Farm). The site is very small (0.1ha), and as it is far away from the nearest heritage assets, neutral effects are anticipated.

ISA topic	ISA objective	Significant effect?	Commentary
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	--	*The site is predominantly greenfield and wholly falls within an Area of Outstanding Natural Beauty, National Park or Country Park.* The site wholly falls within an AONB (Wye Valley).
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (flood zone 2 and 3).*
		+	*The site does not intersect with a high surface flood risk area (flood zone 2 and 3).*

GS0101 – Land adjacent to Parklands

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	-	*The site has poor access to existing employment (>1,600m from an employment centre).* The site is 10-15km from the nearest protected employment site (Cuckoo's Row in Raglan, Station Road, Bulwark Road, Job Centre and School Hill, all in Chepstow, and Wonastow Road, Mayhill/ Hadnock Road and Tri-Wall, all in Monmouth).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	+	*The site has capacity to deliver new homes (<100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 15 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	-	*The site is not within reasonable walking distance (≤800m) to a primary or a secondary school (≤1,600m).* The site is 1,200-1,300m from the nearest primary school (Llandogo Primary) and 10-15km from the nearest secondary school (Chepstow Comprehensive, Mounton House Special School, and Monmouth Comprehensive).

ISA topic	ISA objective	Significant effect?	Commentary
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	*The site is within 800m of a health service or an active travel route.* The site is not within 800m of a health service; however, it is 101m from the nearest PRoW.
		++	*The site is within 800m of a formal leisure and green space.* The site is 200-300m from the nearest area of amenity importance and 300-400m from the nearest green space (play space). It is also 293m from the nearest National Trail.
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Trellech United 2 LSOA, which is amongst the 20-30% least deprived LSOAs in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 0-50m from the nearest bus stop (Old Market Garden) and 101m from the nearest PRoW. However, it is not within reasonable walking distance to a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 224m from the nearest waterbody (coast) and falls wholly within the River Wye Catchment Area.

ISA topic	ISA objective	Significant effect?	Commentary
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.
		--	*The site is within a mineral safeguarding area.* The site is within a mineral safeguarding area for sand and gravel.
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.* The site is 72m from the nearest area of ancient woodland, 89m from the nearest priority habitat (traditional orchard), 153m from the nearest SINC (Part of Cuckoo Wood and Great Park Coniger), 214m from the nearest SAC and SSSI (River Wye/ Afon Gwy), and 728m from the nearest NNR (The Hudnalls).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	--	*Development at the site has the potential for a significant negative effect on the historic environment.* The site wholly falls within a conservation area (Llandogo) and registered historic landscape (The Lower Wye Valley). In addition, it is 572m from the nearest grade II* listed building, 580m from the nearest grade II listed building, and 851m from the nearest scheduled monument (Offa's Dyke: section on St Briavels Common, immediately south of Sittingreen). The site is small (0.6ha); however, it is likely to impact the setting of both the conservation area and registered historic landscape.

ISA topic	ISA objective	Significant effect?	Commentary
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	--	*The site is predominantly greenfield and wholly falls within an Area of Outstanding Natural Beauty, National Park or Country Park.* The site wholly falls within an AONB (Wye Valley).
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (flood zone 2 and 3).*
		-	*The site intersects with surface water flood zone 2 or 3.* Less than 50% of the site intersects with surface water Flood Zone 2 or 3. However, it is recognised that this is isolated to the southeastern corner of the site.

CS0245 – Land at Parklands Llandogo

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	-	*The site has poor access to existing employment (>1,600m from an employment centre).* The site is 10-15km from the nearest protected employment site (Bulwark Road, Job Centre, School Hill and Station Road, all in Chepstow, Tri-Wall, Wonastow Road and Mayhill/ Hadnock Road, all in Monmouth, and Cuckoo's Row in Raglan).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	+	*The site has capacity to deliver new homes (<100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 20 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	-	*The site is not within reasonable walking distance (≤800m) to a primary or a secondary school (≤1,600m).*

ISA topic	ISA objective	Significant effect?	Commentary
			The site is 1,200-1,300m from the nearest primary school (Llandogo Primary) and 10-15km from the nearest secondary school (Chepstow Comprehensive, Monmouth Comprehensive and Mounton House Special School).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	*The site is within 800m of a health service or an active travel route.* The site is not within 800m of a health service; however, it is 92m from the nearest PRoW.
		++	*The site is within 800m of a formal leisure and green space.* The site is 200-300m from the nearest area of amenity importance and 300-400m from the nearest green space (play space). It is also 357m from the nearest National Trail.
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Trellech United 2 LSOA, which is amongst the 20-30% least deprived LSOAs in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 0-50m from the nearest bus stop (Old Market Garden) and 92m from the nearest PRoW. However, it is not within reasonable walking distance to a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site is 288m from the nearest waterbody (coast) and falls wholly within the River Wye Catchment Area.
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.
		--	*The site is within a mineral safeguarding area.* The site is within a mineral safeguarding area for sand and gravel.
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.* The site is 43m from the nearest area of ancient woodland, 66m from the nearest priority habitat (traditional orchard), 76m from the nearest SINC (Part of Cuckoo Wood and Great Park Coniger), 278m from the nearest SAC and SSSI (River Wye/ Afon Gwy), and 777m from the nearest NNR (The Hudnalls).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	--	*Development at the site has the potential for a significant negative effect on the historic environment.* The site wholly falls within a conservation area (Llandogo) and registered historic landscape (The Lower Wye Valley). In addition, it is 547m from the nearest grade II* listed building, 558m from the nearest grade II listed building, and 916m from the nearest

ISA topic	ISA objective	Significant effect?	Commentary
			scheduled monument (Offa's Dyke: section on St Briavels Common, immediately south of Sittingreen). The site is small (1.1ha); however, it is likely to impact the setting of both the conservation area and registered historic landscape.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	--	*The site is predominantly greenfield and wholly falls within an Area of Outstanding Natural Beauty, National Park or Country Park.* The site wholly falls within an AONB (Wye Valley).
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (flood zone 2 and 3).*
		-	*The site intersects with surface water flood zone 2 or 3.* Less than 50% of the site intersects with surface water Flood Zone 2 or 3.

CS0234 – Land east De Clere Way

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	-	*The site has poor access to existing employment (>1,600m from an employment centre).* The site is 8-9km from the nearest protected employment site (Mayhill/ Hadnock Road, Wonastow Road and Tri-Wall, all in Monmouth).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	+	*The site has capacity to deliver new homes (<100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 10 new homes.

ISA topic	ISA objective	Significant effect?	Commentary
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	+	*The site is within reasonable walking distance (≤800m) to a primary or a secondary school (≤1,600m).* The site is 500-600m from the nearest primary school (Trellech Primary); however, it is 9-10km from the nearest secondary school (Monmouth Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	++	*The site is within 800m of a health service and an active travel route.* The site is 600-700m from the nearest GP surgery (Trellech Surgery, Trellech) and 87m from the nearest PRoW.
		++	*The site is within 800m of a formal leisure and green space.* The site is 0-50m from the nearest area of amenity importance and 100-200m from the nearest green space (religious grounds).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Trellech United 1 LSOA, which is amongst the 30-40% least deprived LSOAs in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 50-100m from the nearest bus stop (Church Farm) and 87m from the nearest PRoW. However, it is not within reasonable walking distance to a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*

ISA topic	ISA objective	Significant effect?	Commentary
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 134m from the nearest waterbody (river).
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site comprises residential curtilage and agricultural land.
		+	*The site does not intersect with a mineral safeguarding area.*
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	-	*The site intersects or is adjacent to a regionally or locally (LNRs and SINCs) designated site and/ or priority habitats/ species.* The northeastern extent of the site contains a priority habitat (traditional orchard). In addition, site is 126m from the nearest SINC (Poulters Field) and 645m from the nearest area of ancient woodland.
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	--	*Development at the site has the potential for a significant negative effect on the historic environment.* The site wholly intersects with an archaeologically sensitive area. In addition, the southwestern extent of the site intersects with a conservation area (Trellech) (28% overlap). The site is also 21m from the nearest grade II listed building, 79m from the nearest scheduled monument (Tump Terrett Castle Mound), and 116m from the nearest grade I listed building.

ISA topic	ISA objective	Significant effect?	Commentary
			The site is small (0.4ha); however, it is still likely to impact the setting of the conservation area and nearby listed buildings within the conservation area. Development also has the potential to disturb on-site and nearby archaeological remains.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	--	*The site is predominantly greenfield and wholly falls within an Area of Outstanding Natural Beauty, National Park or Country Park.* The site wholly falls within an AONB (Wye Valley).
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (flood zone 2 and 3).*
		-	*The site intersects with surface water flood zone 2 or 3.* Less than 50% of the site intersects with surface water Flood Zone 2 or 3. However, it is recognised that this is isolated to the southwestern extent of the site.

CS0124 – The Reckless

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	-	*The site has poor access to existing employment (>1,600m from an employment centre).* The site is 10-15km from the nearest protected employment site (Cuckoo's Row in Raglan, Newhouse Farm, Station Road, School Hill, Bulwark Road, Job Centre and Beaufort Park, all in Chepstow, and Mayhill/ Hadnock Road, Tri-Wall and Wonastow Road, all in Monmouth).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	+	*The site has capacity to deliver new homes (<100 dwellings) and it does not intersect with a designated green wedge.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site has capacity to deliver 10 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	-	*The site is not within reasonable walking distance (≤800m) to a primary or a secondary school (≤1,600m).* The site is 1,300-1,400m from the nearest primary school (Llandogo Primary) and 10-15km from the nearest secondary school (Chepstow Comprehensive, Monmouth Comprehensive and Mounton House Special School).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	*The site is within 800m of a health service or an active travel route.* The site is not within 800m of a health service; however, it is 6m from the nearest PRoW.
		++	*The site is within 800m of a formal leisure and green space.* The site is 200-300m from the nearest area of amenity importance and 300-400m from the nearest green space (cemetery and religious grounds). It is also 234m from the nearest National Trail.
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Trellech United 1 and Trellech United 2 LSOAs, which are amongst the 30-40% and 20-30% least deprived LSOAs in Wales respectively.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 100-200m from the nearest bus stop (Old Post Office) and 6m from the nearest PRoW. However, it is not within reasonable walking distance to a neighbourhood centre or central shopping area.

ISA topic	ISA objective	Significant effect?	Commentary
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 170m from the nearest waterbody (coast) and falls wholly within the River Wye Catchment Area.
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	?	*The site is predominantly greenfield land (≥50%) and contains low quality agricultural land (Grade 3b, 4, urban).* The site is currently vacant.
		+	*The site does not intersect with a mineral safeguarding area.*
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.* The site is 6m from the nearest area of ancient woodland, 16m from the nearest SAC (Wye Valley Woodlands/ Coetiroedd Dyffryn Gwy) and SSSI (Cleddon Shoots Woodlandd), 197m from the nearest priority habitat (traditional orchard), 234m from the nearest SINC (Bargain Wood), and 570m from the nearest NNR (The Hudnalls).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets.	--	*Development at the site has the potential for a significant negative effect on the historic environment.* The site wholly falls within a conservation area (Llandogo) and registered historic landscape (The Lower Wye Valley). In addition,

ISA topic	ISA objective	Significant effect?	Commentary
	Promote understanding of Monmouthshire's cultural heritage.		the site is 97m from the nearest grade II listed building and 166m from the nearest grade II* listed building. The site is small (0.8ha); however, it is likely to impact the setting of both the conservation area and registered historic landscape.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	--	*The site is predominantly greenfield and wholly falls within an Area of Outstanding Natural Beauty, National Park or Country Park.* The site wholly falls within an AONB (Wye Valley).
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (flood zone 2 and 3).*
		+	*The site does not intersect with a high surface flood risk area (flood zone 2 and 3).*

Residential and amenity land

CS0230 – Land south of the A466

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	-	*The site has poor access to existing employment (>1,600m from an employment centre).* The site is 10-15km from the nearest protected employment site (Newhouse Farm, Bulwark Road, Job Centre, School Hill, Beaufort Park and Station Road, all in Chepstow, Wonastow Road, Mayhill/ Hadnock Road and Tri-Wall, all in Monmouth, and Cuckoo's Row in Raglan).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	+	*The site has capacity to deliver new homes (<100 dwellings) and it does not intersect with a designated green wedge.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site has capacity to deliver 20 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	-	*The site is not within reasonable walking distance (≤800m) to a primary or a secondary school (≤1,600m).* The site is 1,400-1,500m from the nearest primary school (Llandogo Primary) and 10-15km from the nearest secondary school (Chepstow Comprehensive, Mounton House Special School, and Monmouth Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	*The site is within 800m of a health service or an active travel route.* The site is not within 800m of a health service; however, it is 48m from the nearest PRoW.
		++	*The site is within 800m of a formal leisure and green space.* The site is 0-50m from the nearest area of amenity importance and 300-400m from the nearest green space (cemetery). It is also 123m from the nearest National Trail.
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Trellech United 2 LSOA, which is amongst the 20-30% least deprived LSOAs in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 50-100m from the nearest bus stop (Old Market Garden) and 48m from the nearest PRoW. However, it is not within reasonable walking distance to a neighbourhood centre or central shopping area.

ISA topic	ISA objective	Significant effect?	Commentary
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 57m from the nearest waterbody (coast) and falls wholly within the River Wye Catchment Area.
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.
		--	*The site is within a mineral safeguarding area.* The site is within a mineral safeguarding area for sand and gravel.
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.* The site is 47m from the nearest SAC and SSSI (River Wye/ Afon Gwy), 54m from the nearest priority habitat (traditional orchard), 127m from the nearest area of ancient woodland, 234m from the nearest SINC (Part of Cuckoo Wood and Great Park Coniger), and 523m from the nearest NNR (The Hudnalls).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets.	--	*Development at the site has the potential for a significant negative effect on the historic environment.*

ISA topic	ISA objective	Significant effect?	Commentary
	Promote understanding of Monmouthshire's cultural heritage.		The site wholly falls within a conservation area (Llandogo) and registered historic landscape (The Lower Wye Valley). In addition, it is 350m from the nearest grade II* listed building, 357m from the nearest grade II listed building, and 714m from the nearest scheduled monument (Offa's Dyke: section on St Briavels Common, immediately south of Sittingreen). The site is small (1.1ha); however, it is likely to impact the setting of both the conservation area and registered historic landscape.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	--	*The site is predominantly greenfield and wholly falls within an Area of Outstanding Natural Beauty, National Park or Country Park.* The site wholly falls within an AONB (Wye Valley).
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	++	*The site falls wholly within fluvial flood zone 2 or 3.* Over 50% of the site intersects with fluvial Flood Zone 2 or 3.
		-	*The site intersects with Flood Zone 2 or 3.* Less than 50% of the site intersects with surface water Flood Zone 2 or 3.

Renewable Energy (Solar)

CS0222 – Land at Penarth Farm

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	0	*N/A* The site is proposed for renewable energy (solar).

ISA topic	ISA objective	Significant effect?	Commentary
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	0	*N/A*
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	0	*N/A*
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	0	*N/A*
		0	*N/A*
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Trellech United 1 LSOA, which is amongst the 30-40% least deprived LSOAs in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	0	*N/A*
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 462m from the nearest waterbody (river) and the southeastern extent of the site falls within the River Wye Catchment Area.
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).*

ISA topic	ISA objective	Significant effect?	Commentary
	development and protecting, where possible, higher grade agricultural land.		The site is currently used for agriculture.
		+	*The site does not intersect with a mineral safeguarding area.*
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	--	*The site intersects or is adjacent to an internationally (SAC, SPA, Ramsar) or nationally (SSSI, Ancient Woodland, NNRs) designated site.* The northern boundary of the site intersects with an area of ancient woodland (0.1% overlap). In addition, the site is 114m from the nearest priority habitat (lowland meadow), 161m from the nearest SINC (Holly Meadow), and 766m from the nearest SSSI (Penarth Brook Woodlands).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	0	*Development at this site will have a neutral effect on the historic environment.* The site is 518m from the nearest grade II* listed building, 586m from the nearest grade II listed building, and 750m from the nearest scheduled monument (Dovecot at Hygga Farm). The site is relatively large (8.5ha); however, it is also relatively far away from the aforementioned heritage assets. In addition, solar panels are less likely to impact the historic environment when compared to housing development due to their lower height. Therefore, neutral effects are anticipated.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	--	*The site is predominantly greenfield and wholly falls within an Area of Outstanding Natural Beauty, National Park or Country Park.* The site wholly falls within an AONB (Wye Valley).
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (flood zone 2 and 3).*

ISA topic	ISA objective	Significant effect?	Commentary
		+	*The site does not intersect with a high surface flood risk area (flood zone 2 and 3).*

Usk

Residential

CS0039 – Land at Little Castle Farm, Monmouth Road

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	0	*The site has reasonable access to existing employment (800-1,600m from an employment centre).* The site is 1,500-1,600m from the nearest protected employment site (Woodside Industrial Estate, Usk).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	+	*The site has capacity to deliver new homes (<100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 50 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	-	*The site is not within reasonable walking distance (≤800m) to a primary or a secondary school (≤1,600m).* The site is 900-1,000m from the nearest primary school (Usk Church in Wales Primary) and 15-20km from the nearest secondary school (Chepstow Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	*The site is within 800m of a health service or an active travel route.* The site is not within 800m of a health service; however, it is 240m from the nearest National Cycle Network route.

ISA topic	ISA objective	Significant effect?	Commentary
		+	*The site is within 800m of a formal leisure or green space.* The site is not within 800m of an area of amenity importance; however, it is 0-50m from the nearest green space (play space).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Usk 2 LSOA, which is amongst the 10% least deprived LSOA in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 300-400m from the nearest bus stop (Burrium Gate) and 240m from the nearest National Cycle Network route. It is also 298m from the nearest PRoW. However, it is not within reasonable walking distance to a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 269m from the nearest waterbody (river).
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).*

ISA topic	ISA objective	Significant effect?	Commentary
			The site is currently used for agriculture.
		+	*The site does not intersect with a mineral safeguarding area.*
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	--	*The site intersects or is adjacent to an internationally (SAC, SPA, Ramsar) or nationally (SSSI, Ancient Woodland, NNRs) designated site.* The northwestern boundary of the site intersects with a SINC (Cockshoot Wood, Little Castle) (5% overlap) and is adjacent to an area of ancient woodland. In addition, the site is 287m from the nearest priority habitat (purple moor grass and rush pastures) and 822m from the nearest SAC and SSSI (River Usk/ Afon Wysg).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	0	*Development at this site will have a neutral effect on the historic environment.* The site is 571m from the nearest archaeologically sensitive area, 572m from the nearest conservation area (Usk), 671m from the nearest scheduled monument (Usk Castle (unoccupied parts)), 693m from the nearest grade II listed building, 706m from the nearest grade I listed building, and 940m from the nearest grade II* listed building. The site is relatively large (3.7ha); however, given that the aforementioned heritage assets are relatively far away from the site, neutral effects are anticipated.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	+	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park.*
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (flood zone 2 and 3).*
		-	*The site intersects with surface water flood zone 2 or 3.*

ISA topic	ISA objective	Significant effect?	Commentary
			Less than 50% of the site intersects with surface water Flood Zone 2 or 3. However, it is recognised that this is isolated to the southwestern boundary of the site.

CS0113 – Burrium Gate Phase II

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	0	*The site has reasonable access to existing employment (800-1,600m from an employment centre).* The site is 1,200-1,300m from the nearest protected employment site (Woodside Industrial Estate, Usk).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	+	*The site has capacity to deliver new homes (<100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 50 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	+	*The site is within reasonable walking distance (≤800m) to a primary or a secondary school (≤1,600m).* The site is 600-700m from the nearest primary school (Usk Church in Wales Primary); however, it is 15-20km from the nearest secondary school (Chepstow Comprehensive, King Henry VIII Comprehensive, and Monmouth Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	*The site is within 800m of a health service or an active travel route.* The site is not within 800m of a health service; however, it is 7m from the nearest National Cycle Network route.
		+	*The site is within 800m of a formal leisure or green space.* The site is not within 800m of an area of amenity importance; however, it is 0-50m from the nearest green space (play space).

ISA topic	ISA objective	Significant effect?	Commentary
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Usk 2 LSOA, which is amongst the 10% least deprived LSOA in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	++	*The site is within close proximity (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, and an active travel route.* The site is 0-50m from the nearest bus stop (Common Trip), 700-800m from the nearest central shopping area (Usk), and 7m from the nearest National Cycle Network route. It is also 151m from the nearest PRoW.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 90m from the nearest waterbody (river).
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.
		+	*The site does not intersect with a mineral safeguarding area.*

ISA topic	ISA objective	Significant effect?	Commentary
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.* The site is 56m from the nearest priority habitat (purple moor grass and rush pastures), 154m from the nearest SINC (Cockshoot Wood), 157m from the nearest area of ancient woodland, and 972m from the nearest SAC and SSSI (River Usk/ Afon Wysg).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	0	*Development at this site will have a neutral effect on the historic environment.* The site is 516m from the nearest archaeologically sensitive area, 526m from the nearest conservation area (Usk), 547m from the nearest grade II listed building, 654m from the nearest scheduled monument (Usk Castle (unoccupied parts)), 681m from the nearest grade I listed building, and 933m from the nearest grade II* listed building. The site is relatively large (2.6ha); however, given that the aforementioned heritage assets are relatively far away from the site, neutral effects are anticipated.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	+	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park.*
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (flood zone 2 and 3).*
		+	*The site does not intersect with a high surface flood risk area (flood zone 2 and 3).*

CS0282 – Land north of Burrium Gate

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	0	*The site has reasonable access to existing employment (800-1,600m from an employment centre).* The site is 1,400-1,500m from the nearest protected employment site (Woodside Industrial Estate, Usk).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	+	*The site has capacity to deliver new homes (<100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 95 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	-	*The site is not within reasonable walking distance (≤800m) to a primary or a secondary school (≤1,600m).* The site is 800-900m from the nearest primary school (Usk Church in Wales Primary) and 15-20km from the nearest secondary school (Chepstow Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	*The site is within 800m of a health service or an active travel route.* The site is not within 800m of a health service; however, it is 112m from the nearest PRoW.
		+	*The site is within 800m of a formal leisure or green space.* The site is not within 800m of an area of amenity importance; however, it is 0-50m from the nearest green space (play space).
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Usk 2 LSOA, which is amongst the 10% least deprived LSOA in Wales.

ISA topic	ISA objective	Significant effect?	Commentary
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 300-400m from the nearest bus stop (Burrium Gate and Ladyhill) and 112m from the nearest PRoW. It is also 256m from the nearest National Cycle Network route. However, it is not within reasonable walking distance to a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 265m from the nearest waterbody (river).
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.
		+	*The site does not intersect with a mineral safeguarding area.*
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	--	*The site intersects or is adjacent to an internationally (SAC, SPA, Ramsar) or nationally (SSSI, Ancient Woodland, NNRs) designated site.* The site intersects with a SINC (Cockshoot Wood, Little Castle) (88% overlap). In addition, the northeastern boundary of the site is

ISA topic	ISA objective	Significant effect?	Commentary
			adjacent to an area of ancient woodland. The site is also 277m from the nearest priority habitat (traditional orchard) and 449m from the nearest SAC and SSSI (River Usk/ Afon Wysg).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	-	*Development at the site has the potential for a negative effect on the historic environment.* The site is 220m from the nearest archaeologically sensitive area, 251m from the nearest conservation area (Usk), 294m from the nearest scheduled monument (Usk Castle (unoccupied parts)), 359m from the nearest grade I listed building, 404m from the nearest grade II listed building, and 554m from the nearest grade II* listed building. The site is large (5.9ha) and development has the potential to disturb nearby archaeological remains. The southwestern extent of the site also has the potential to impact the setting of the conservation area.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	+	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park.*
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (flood zone 2 and 3).*
		+	*The site does not intersect with a high surface flood risk area (flood zone 2 and 3).*

Wyesham

Residential

CS0189 – Land at Tudor Road

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	0	*The site has reasonable access to existing employment (800-1,600m from an employment centre).* The site is 900-1,000m from the nearest protected employment site (Mayhill/ Hadnock Road, Monmouth).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	+	*The site has capacity to deliver new homes (<100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 58 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	+	*The site is within reasonable walking distance (≤800m) to a primary or a secondary school (≤1,600m).* The site is 200-300m from the nearest primary school (Kymin View Primary); however, it is 1,900-2,000m from the nearest secondary school (Monmouth Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	+	*The site is within 800m of a health service or an active travel route.* The site is not within 800m of a health service; however, it is 46m from the nearest PRoW.
		++	*The site is within 800m of a formal leisure and green space.* The site is 50-100m from the nearest area of amenity importance and green space (playing field). It is also 522m from the nearest National Trail.

ISA topic	ISA objective	Significant effect?	Commentary
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Wyesham LSOA, which is amongst the 40-50% least deprived LSOAs in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	++	*The site is within close proximity (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, and an active travel route.* The site is 100-200m from the nearest bus stop (Tudor Road) and neighbourhood centre (Wyesham, Monmouth), and 46m from the nearest PRoW. It is also 672m from the nearest National Cycle Network route.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 667m from the nearest waterbody (river) and falls wholly within the River Wye Catchment Area.
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is predominantly brownfield land (>50%) and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.
		+	*The site does not intersect with a mineral safeguarding area.*

ISA topic	ISA objective	Significant effect?	Commentary
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.* The site is 24m from the nearest SINC (Wyesham Lane), 68m from the nearest area of ancient woodland, 72m from the nearest priority habitat (traditional orchard), 355m from the nearest SAC (Wye Valley Woodlands/ Coetiroedd Dyffryn Gwy), and 355m from the nearest SSSI (Harper's Grove – Lord's Grove).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	--	*Development at the site has the potential for a significant negative effect on the historic environment.* The site wholly intersects with a registered historic landscape (The Lower Wye Valley). In addition, the site is 237m from the nearest grade II listed building, 590m from the nearest grade II* listed building, 786m from the nearest scheduled monument (May Hill Pillboxes), 863m from the nearest archaeologically sensitive area, and 891m from the nearest conservation area (Monmouth (central)). The site is relatively small (2.1ha); however, it is still likely to impact the setting of the registered historic landscape.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	?	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park; however, the site is either adjacent to/ within close proximity to one of these designated landscapes, and/ or the scale of development proposed (≥ 100 dwellings) on greenfield land has the potential for a negative effect. This is uncertain at this stage.* The site is 16m from the nearest AONB (Wye Valley).
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (flood zone 2 and 3).*

ISA topic	ISA objective	Significant effect?	Commentary
		+	*The site does not intersect with a high surface flood risk area (flood zone 2 and 3).*

Employment (B1/B8), Hotel (C1)

CS0292 – Rhossii, Hadnock Road

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	++	*New employment land proposed at the site.* The site is proposed for employment use (B1/ B8) and a hotel (C1).
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	0	*The site will deliver new employment land.*
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	0	*N/A*
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	0	*N/A*
		0	*N/A*
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Wyesham LSOA, which is amongst the 40-50% least deprived LSOAs in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	0	*N/A*
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*

ISA topic	ISA objective	Significant effect?	Commentary
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 144m from the nearest waterbody (river) and falls wholly within the River Wye Catchment Area.
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	?	*The site is predominantly greenfield land (≥50%) and contains low quality agricultural land (Grade 3b, 4, urban).* The site comprises residential curtilage and agricultural land.
		--	*The site is within a mineral safeguarding area.* The site is within a mineral safeguarding area for sand and gravel.
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.* The site is 7m from the nearest area of ancient woodland, 113m from the nearest SAC and SSSI (River Wye/ Afon Gwy), 285m from the nearest priority habitat (traditional orchard), 483m from the nearest NNR (Fiddler's Elbow), and 690m from the nearest SINC (The Green).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	--	*Development at the site has the potential for a significant negative effect on the historic environment.* The site wholly intersects with a registered historic landscape (The Lower Wye Valley). In addition, the site is 48m from the nearest grade II listed building, 231m from the nearest conservation area

ISA topic	ISA objective	Significant effect?	Commentary
			(Monmouth (central)), 367m from the nearest scheduled monument (May Hill Pillboxes), 369m from the nearest archaeologically sensitive area, 414m from the nearest grade II* listed building, and 872m from the nearest grade I listed building. The site is relatively large (3.4ha) and is still likely to impact the setting of the registered historic landscape and nearest grade II listed building, which is located to the northeast of the site.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	-	*The site intersects with an Area of Outstanding Natural Beauty, National Park or Country Park.* The northeastern extent of the site intersects with an AONB (Wye Valley) (6% overlap).
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	-	*The site intersects with fluvial flood zone 2 or 3.* Less than 50% of the site intersects with fluvial Flood Zone 2 or 3. However, it is recognised that this is isolated to the northwestern boundary of the site.
		+	*The site does not intersect with a high surface water flood risk area (flood zone 2 and 3).*

Hotel (C1)

CS0273 – Rhossili, Hadnock Road

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	++	*New employment land proposed at the site.* The site is proposed for mixed-use, including a hotel (C1).

ISA topic	ISA objective	Significant effect?	Commentary
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	+	*The site has capacity to deliver new homes (<100 dwellings) and it does not intersect with a designated green wedge.* The site has capacity to deliver 50-60 new homes.
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	+	*The site is within reasonable walking distance (≤800m) to a primary or a secondary school (≤1,600m).* The site is 1,200-1,300m from the nearest primary school (Kymin View Primary); however, it is 1,300-1,400m from the nearest secondary school (Monmouth Comprehensive).
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	++	*The site is within 800m of a health service and an active travel route.* The site is 300-400m from the nearest dentist (Mayhill Lodge, Monmouth) and 2m from the nearest National Cycle Network route.
		++	*The site is within 800m of a formal leisure and green space.* The site is 400-500m from the nearest area of amenity importance and 200-300m from the nearest green space (other sports facility). It is also 36m from the nearest National Trail.
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Wyesham LSOA, which is amongst the 40-50% least deprived LSOAs in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	+	*The site is within reasonable walking distance (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, or an active travel route.* The site is 100-200m from the nearest bus stop (Kymin Road) and 2m from the nearest National Cycle Network route. It is also 36m

ISA topic	ISA objective	Significant effect?	Commentary
			form the nearest PRoW. However, it is not within reasonable walking distance to a neighbourhood centre or central shopping area.
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.* The site is 144m from the nearest waterbody (river) and falls wholly within the River Wye Catchment Area.
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	?	*The site is predominantly greenfield land (≥50%) and contains low quality agricultural land (Grade 3b, 4, urban).* The site comprises residential curtilage and agricultural land.
		--	*The site is within a mineral safeguarding area.* The site is within a mineral safeguarding area for sand and gravel.
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.* The site is 7m from the nearest area of ancient woodland, 113m from the nearest SAC and SSSI (River Wye/ Afon Gwy), 285m from the nearest priority habitat (traditional orchard), 483m from the nearest NNR (Fiddler's Elbow), and 690m from the nearest SINC (The Green).

ISA topic	ISA objective	Significant effect?	Commentary
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	--	*Development at the site has the potential for a significant negative effect on the historic environment.* The site wholly intersects with a registered historic landscape (The Lower Wye Valley). In addition, the site is 48m from the nearest grade II listed building, 231m from the nearest conservation area (Monmouth (central)), 367m from the nearest scheduled monument (May Hill Pillboxes), 369m from the nearest archaeologically sensitive area, 414m from the nearest grade II* listed building, and 872m from the nearest grade I listed building. The site is relatively large (3.4ha) and is still likely to impact the setting of the registered historic landscape and nearest grade II listed building, which is located to the northeast of the site.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	-	*The site intersects with an Area of Outstanding Natural Beauty, National Park or Country Park.* The northeastern extent of the site intersects with an AONB (Wye Valley) (6% overlap).
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	-	*The site intersects with fluvial flood zone 2 or 3.* Less than 50% of the site intersects with fluvial Flood Zone 2 or 3. However, it is recognised that this is isolated to the northwestern boundary of the site.
		+	*The site does not intersect with a high surface water flood risk area (flood zone 2 and 3).*

N / A

Tourism

CS0259 – Bridge View Farm Portskewett

ISA topic	ISA objective	Significant effect?	Commentary
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	++	*New employment land proposed at the site.* The site is proposed for tourism.
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	0	*The site will deliver new employment land.*
	To enhance design quality to create places for people that maintain and enhance community and settlement identity	0	*N/A*
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	0	*N/A*
		0	*N/A*
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	*The site falls within one of the 50% least deprived LSOAs in Wales.* The site falls within the Portskewett LSOA, which is amongst the 10-20% least deprived LSOAs in Wales.
Transport and movement	Increase sustainable transport use and reduce the need to travel.	0	*N/A*
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	*The site does not intersect with an AQMA.*
	To conserve, protect and enhance the water environment, water quality and water resources.	-	*The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area.*

ISA topic	ISA objective	Significant effect?	Commentary
			The site is 131m from the nearest waterbody (river) and falls wholly within the River Wye Catchment Area.
		+	*The site does not intersect with a Groundwater Source Protection Zone (SPZ).*
		+	*The site does not intersect with a Nitrate Vulnerable Zone (NVZ).*
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	--	*The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a).* The site is currently used for agriculture.
		--	*The site is within a mineral safeguarding area.* The site is within a mineral safeguarding area for sand and gravel.
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	?	*The site does not intersect, but is within 1km of a designated site, and there is an element of uncertainty relating to the potential for significant effects.* The site is 268m from the nearest SAC, SPA and SSSI (Severn Estuary), 421m from the nearest priority habitat (traditional orchard), 525m from the nearest area of ancient woodland, and 845m from the nearest SINC (Withey Bed).
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets. Promote understanding of Monmouthshire's cultural heritage.	--	*Development at the site has the potential for a significant negative effect on the historic environment.* The site wholly intersects with an archaeologically sensitive area and registered historic landscape (Gwent Levels). In addition, the site is 495m from the nearest grade II listed building, 804m from the nearest grade II* listed building, and 941m from the nearest conservation area (Mathern).

ISA topic	ISA objective	Significant effect?	Commentary
			The site is relatively large (4.1ha) and is likely to disturb on-site archaeological remains, as well as impact the setting of the registered historic landscape.
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	+	*The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park.*
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	*The site does not intersect with a high fluvial flood risk area (Flood Zone 2 and 3).*
		-	*The site intersects with surface water flood zone 2 or 3.* Less than 50% of the site intersects with surface water Flood Zone 2 or 3. However, it is recognised that this is isolated to the northeastern extent of the site.

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APPENDIX 5

Habitats Regulations Assessment of the Monmouthshire Replacement Local Development Plan

Deposit Plan

Monmouthshire Council

Project number: 60609986

September 2024

Delivering a better world

Quality information

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Revision History

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Executive Summary

Introduction

AECOM was appointed by Monmouthshire County Council (MCC) to undertake a Habitats Regulations Assessment of its Replacement Local Development Plan (RLDP) Deposit Plan, which sets out the development in Monmouthshire between 2018 and 2033 that includes provision for approximately 6,210 net new homes and 38ha net new employment land. The objective of this assessment is to identify any aspects of the Plan that would cause an adverse effect on the integrity of internationally important wildlife sites, otherwise known as European sites (Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and, as a matter of Government policy, Ramsar sites), either in isolation or in combination with other plans and projects, and to advise on appropriate policy mechanisms for delivering mitigation where such effects are identified. However, given its relatively early stage the RLDP does not yet set out the specific site allocations nor detailed policy wording.

Legislative Context

The need for an assessment of impacts on European sites is set out in the Conservation of Habitats and Species Regulations 2017 (as amended). To ascertain whether the integrity of any European sites will be affected, competent authorities must therefore undertake an HRA of the plan or project in question, including an Appropriate Assessment if necessary, before approving it.

Scope

Given an initial assessment of the relevant European sites within 15km of Monmouthshire and the impact pathways present, the HRA addresses the following European sites: Usk Bat Sites SAC, Cwm Clydach Woodlands SAC, Wye Valley Woodlands SAC, Wye Valley and Forest of Dean Bat Sites SAC, Severn Estuary SPA / Ramsar, Severn Estuary SAC, River Wye SAC, Avon Gorge Woodlands SAC, River Usk SAC, Aberbargoed Grasslands SAC, Sugar Loaf Woodlands SAC, Llangorse Lake SAC and Coed y Cerrig SAC.

Likely Significant Effects

Following initial evidence gathering, the first stage of any Habitats Regulations Assessment is a screening for Likely Significant Effects (LSEs), essentially an assessment of the risks for European sites, associated with a development plan. If LSEs cannot be excluded, and a mechanism for an adverse interaction between a plan and a receptor site is present, the next stage of HRA, known as Appropriate Assessment, needs to be undertaken. The Appropriate Assessment is a more detailed analysis of the impact pathways and European sites considered at the screening stage. One of the key elements of an Appropriate Assessment is the consideration of mitigation measures, which might protect a European site from potential harmful adverse effects[1]. Furthermore, a recent ruling established that habitats or species outside a European site, which are essential for the functioning of the protected site, must be taken into account in the HRA process[2]. For this HRA, both Task 1 (Screening for Likely Significant Effects; LSEs) and Task 2 (Appropriate Assessment) were carried out.

The HRA shows that LSEs can be excluded for the identified impact pathways in relation to most European sites. However, the following require investigation in appropriate assessment:

- Atmospheric pollution impacts on the Usk Bat Sites SAC, Cwm Clydach Woodlands SAC, Wye Valley Woodlands SAC and the Severn Estuary SAC / SPA / Ramsar
- Recreational pressure in the Severn Estuary SAC / SPA / Ramsar, Usk Bat Sites SAC, River Usk SAC, River Wye SAC, Sugar Loaf Woodlands SAC, and Wye Valley Woodlands SAC.

[1] According to a decision by the European Court of Justice, these can no longer be taken into account at the screening stage of HRA. People Over Wind and Sweetman v Coillte Teoranta (C-323/17)
[2] The 2018 Holohan ruling. Case C-461/17

- Functionally linked land relating to the Severn Estuary SPA / Ramsar, Usk Bat Sites SAC, and Wye Valley & Forest of Dean Bat Sites SAC
- Water quality in the River Usk SAC, River Wye SAC and Severn Estuary SAC
- Water quantity, level and flow in the River Usk SAC, River Wye SAC and Severn Estuary SAC

Appropriate Assessment

Atmospheric Pollution

All traffic growth on major roads within 200m of the relevant European sites was modelled. This included both traffic growth due to Monmouthshire Local Plan and wider traffic growth on the road network over the plan period to 2033. Oxides of nitrogen, ammonia and nitrogen deposition were modelled. Four scenarios were modelled. Three transects were modelled into Severn Estuary SAC/SPA/Ramsar site. Since the critical level for NOx or ammonia is not forecast to be breached no adverse effect on integrity will arise notwithstanding traffic growth. On the English side the nearest saltmarsh in the SAC is 20m from the road. At this point the modelled in combination nitrogen deposition effect from all traffic growth is well below 1% of the critical load and therefore adverse effects on integrity can be dismissed.

Two transects were modelled into Wye Valley Woodlands SAC. Since the critical level for NOx is not forecast to be breached no adverse effect on integrity will arise notwithstanding traffic growth. At the distances the SAC lies back from the road (100m and beyond), modelling shows that there is no impact of traffic growth (alone or in combination) on ammonia concentrations. The modelled in combination nitrogen deposition effect from all traffic growth is well below 1% of the critical load and therefore adverse effects on integrity can be dismissed. Cwm Clydach Woodlands and Usk Bat Sites SACs are considered together because they both lie adjacent to A465 Heads of the Valleys Road at Daren-felen, with Cwm Clydach Woodlands SAC lying immediately beyond the Usk Bat Sites SAC to the south of the road. Three transects were modelled. Since the critical level for NOx is not forecast to be breached no adverse effect on integrity will arise notwithstanding traffic growth.

For both ammonia and nitrogen deposition the in combination effect of Monmouthshire Replacement Local Development Plan in combination with other plans and projects does exceed 1% of the critical level and load and therefore cannot be dismissed on purely numerical grounds. However, the A465 is one of the major trunk roads in Wales and is a main east–west route in South Wales along with the M4 motorway. Moreover, large sections of the road are being converted to dual carriageway by 2025. As such, traffic-related changes in air quality on the A465 are not a local (Monmouthshire) issues but a Wales-wide issue and is the responsibility of the Welsh Government or South Wales Trunk Road Agent (SWTRA).

This is relevant because Joint Nature Conservation Committee (JNCC) guidance on the issue states (pages 20/21) that: ‘The trunk road network forms the core of the national transport system. Trunk roads are central to long distance travel and connectivity across the UK and traffic patterns on trunk roads are a consequence of predicted growth across the UK generally. The effects of development on traffic flows on truck roads are more appropriately taken into account as part of national and regional strategic plan level HRAs.’ As such, this is considered to be an issue to be address at a strategic national scale rather than through the Monmouthshire Local Plan.

Recreational Pressure

Severn Estuary SPA/SAC/Ramsar

To obtain visitor data for the Severn Estuary SPA / Ramsar (and also the SAC), a survey (comprising visitor counts and interviews) was undertaken at four key access locations along the estuary. The home postcodes of interviewees provide the key most important parameter that is used to identify recreational catchments. Typically, the 75th percentile of interviewees (i.e. the distance from the SPA / Ramsar from which 75% of interviewees originate) is used to denote the core recreational catchment. This cut-off point is used to remove the influence of outliers and to demark the catchment that forms the most likely visitor pool. Pooling the postcodes from all ‘local’ visitors (i.e. those on a day trip from home), 75% of visitors travelled a linear distance of 6.5km to the SPA / Ramsar.

However, Stroud Council (in England) and Forest of Dean Council (also in England) have both recently increased the recreational catchment in their area for Severn Estuary from 7km to 12.6km, based on

more recent visitor survey from 2022 . It is to be expected that different parts of the Severn Estuary have different recreational catchments, and the survey data for Monmouthshire clearly indicates a smaller core catchment. However, there is also value in authorities around the Severn Estuary adopting a consistent core catchment. Therefore, it may be advisable for Monmouthshire Council to adopt 12.6km as their core catchment, and thus the zone within which financial contributions to recreational pressure mitigation on the SAC/SPA/Ramsar site would be collected. Allocations within 7km and 12.6km of the SPA/Ramsar site were assessed. A 7km catchment would capture five residential and mixed used allocations (HA3, HA2/EA1m, HA9/EA1l, HA13 and HA18). increasing the catchment to 12.6km would capture one more residential development site (HA14).

Given the high sensitivity of the SPA / Ramsar to impacts resulting from recreational pressure, adverse effects on its site integrity due to additional residential development cannot be excluded. It is anticipated that mitigation measures will be required to avoid adverse effects on the SPA / Ramsar. These could be delivered in the form of Strategic Access Management and Monitoring (SAMM) in the estuary itself, and / or through access enhancements and improvements to appropriately sited, existing or newly developed greenspaces. In England, authorities within the recreational catchment of sites that are sensitive to recreational pressure have developed SAMM strategies to avoid adverse effects on the European sites, including Severn Estuary SPA/Ramsar where such strategies exist for both Stroud and Forest of Dean districts.

It is noted that relevant Deposit Site Allocation policies, with the exception of Site HA14 include reference to the site being within 7km of the Severn Estuary European Marine Site (site HA14 is within 12.6km) and that a financial contribution may be required as part of a mitigation strategy as well the SANG requirements to reduce recreational pressures on the features of the estuary. Policy NR2 – Severn Estuary Recreational Pressure also sets out requirements for proposals that would result in visitor pressure on the Severn Estuary SAC, SPA, Ramsar site, or Functionally Linked land will not be supported unless it can be demonstrated that no adverse impact on the integrity of the European Marine Site will occur. The supporting text links this requirement to a Core Recreational Catchment Zone of 7km identified by the HRA. AECOM recommends that the mixed use sites EA1m and EA1l are also included in this solution along with residential site HA14. As such AECOM recommends that the same policy requirement is included in those policies as has already been included in other relevant allocations.

It is generally considered that adverse effects on the site integrity of the Severn Estuary SAC could be avoided within the remit of a Strategic Access Management and Monitoring Strategy. There are also several policy mechanisms through which the Severn Estuary SAC could be protected, for example by introducing the following wording into a policy addressing the protection of European sites in Monmouthshire: ‘Any development proposals that would increase visitor access to sensitive habitat features in the Severn Estuary SAC, SPA and Ramsar site, especially on to saltmarsh and mudflat habitat, will not be supported unless no adverse effect on the integrity of the sites could be confirmed.’

Other European sites

Impacts on Usk Bat Sites SAC, River Usk SAC, River Wye SAC, Sugar Loaf Woodlands SAC, and Wye Valley Woodlands SAC were also investigated but it was concluded no adverse effect on integrity would arise, without the need for mitigation. For Wye Valley Woodlands SAC this assessment included undertaking a visitor survey in 2023. Using these data, the 75th percentile of all visitors that travelled to the SAC is 39.3km. In other words, three quarters of visitors live within 39.3km of the SAC boundary. This is a very large catchment and represents the importance of the SAC in drawing visitors from long distances. For example, visitors come from as far afield as Lincolnshire, Sheffield, Devon, Hampshire and Nottinghamshire, and visitors from outside Monmouthshire and Wales, make up a large proportion of the survey pool. Even excluding people on holiday to focus entirely on people ‘visiting from home’ still leaves a relatively large catchment of 24km.

This indicates that the Wye Valley Woodlands SAC has a regional, not to say national, draw rather than a local one. In contrast, during surveys of the Severn Estuary SPA/Ramsar/SAC, 75% of visitors lived within 6.5km of the site, indicating the much greater proportion of local residents in the visitor pool. The core recreational catchment for the Wye Valley Woodlands SAC for residents of Monmouthshire (i.e. the zone within which 75% of Monmouthshire-resident visitors are found) is 7km, but it is important to remember that Monmouthshire residents make up a minority of visitors, with 71% of visitors living in other local authorities.

Given these data it is considered that visitor pressure within the SAC is limited, is a regional or national issue, and will not be heavily affected by housing and population growth within Monmouthshire. As such, no mitigation strategy for the Local Plan is required and a conclusion of no adverse effect on integrity is reached. The foregoing assessment inherently takes account of growth in Monmouthshire in combination with growth elsewhere in the recreational catchment of the SAC.

Loss of Functionally Linked Land

The potential for loss of functionally linked land for bats associated with Usk Bat Sites SAC, Wye Valley & Forest of Dean Bat Sites SAC and birds associated with Severn Estuary SPA/Ramsar was assessed.

Usk Bat Sites SAC and Wye Valley & Forest of Dean Bat Sites SAC

No sites are allocated within the Core Sustenance Zone of Usk Bat Sites SAC. Five Local Plan allocations were identified within 3km (the Core Sustenance Zone) of Wye Valley & Forest of Dean Bat Sites SAC: HA8, EA1b, HA4, HA13 and HA18. It was recommended that the following text (or similar) is inserted into a suitable policy in the next iteration of the LP: 'To meet the requirements of the Habitats Directive regarding allocated greenfield sites within the Core Sustenance Zones (CSZs) of the Usk Bat Sites SAC and the Wye Valley and Forest of Dean Bat Sites SAC, the applicant is required to provide evidence that the development will not result in adverse effects on site integrity. To achieve this, a habitat assessment will have to be undertaken by a suitably qualified professional. Where habitats are suitable, a suite of bat surveys (e.g. bat activity surveys, roost emergence surveys) will need to be undertaken between April and September. Where a land parcel is demonstrably used by SAC bats, mitigation and avoidance measures might be required, and the planning application will likely need to be assessed through a project-level Habitats Regulations Assessment and will need to consider matters such as habitat connectivity, foraging value and minimised lighting'.

With regard to this recommendation Monmouthshire Council expressed concern as to whether the extent of the suggested wording is needed as it is too prescriptive. Instead, the Deposit Plan addresses these recommendations by providing less prescriptive form of wording in Policy NR1 – Nature Recovery and Geodiversity and its supporting text in paragraphs 11.10.2 – 11.10.8 under the heading International/National (Statutory) Sites and Protected Sites and Species with specific reference to Functionally Linked Land in paragraph 11.10.5, but without providing specific details of the need for bat surveys, survey seasons and the potential need for mitigation . Policy LC5 – Dark Skies and Lighting, offers further policy requirements in relation to external lighting and potential impacts on biodiversity and ecology. Strategic Policy S8 – Site Allocation Placemaking Principles also covers dark corridors as well as requirements in the site-specific allocation policies where relevant, for example Policy HA4 – Land at Leasbrook, Monmouth. Further specific requirements can be set out in Supplementary Planning Guidance.

Severn Estuary SPA/Ramsar

To aid consideration of functionally-linked land issues Natural England has produced unpublished guidance (there is no Natural Resources Wales equivalent). This guidance groups birds by their maximum foraging distance. According to this guidance most waterfowl and waders remain within 2km of their core roost areas (i.e. the SPA/Ramsar site) when foraging. Of those species for which Severn Estuary SPA/Ramsar is designated the exceptions are Bewick's swan and white-fronted goose which forage up to 10km from their core roost sites. The same Natural England guidance considers that residential development could have an adverse effect on these two species if it resulted in loss of functionally-linked land up to 5km from the core roost areas (the SPA/Ramsar). Therefore 5km was used as the zone to identify potential areas of functionally-linked land that might need further assessment and (if necessary) mitigation for planning applications.

The following sites were identified as being of sufficient size and proximity to the SPA and Ramsar to be utilised by SPA birds: HA3, HA2/EA1m. HA9. EA1l, EA1d/W3c, EA1f/W3d, EA1g, EA1h/W3e and EA1/W3f. These sites were all identified as greenfield sites, although without further survey the level of suitability is difficult to assess. These are generally the parameters that are used for the identification of potential functionally linked land. In addition to the size of the candidate sites and distance of the candidate sites from the Severn Estuary, the Monmouthshire Council ecologists reviewed Preliminary Environmental Appraisals where available and undertook a desk study to determine whether housing sites should be considered (during plan preparation / application preparation) for potential use by overwintering birds. This formed part of the proforma preparation for candidate sites. Of the allocation

sites listed above, many were determined to be unsuitable, with the exception of the Caldicot site HA2, due to habitats present, disturbance levels, agricultural practices. This assessment also applies to site EA1/W3f, which has been considered to have potential for overwintering birds. Other sites considered to be suitable are Gwent Europark and Quay Point.

It was recommended that the following text (or similar) was inserted into an appropriate policy of the Deposit Plan: 'To meet the requirements of the Habitats Directive, the applicant should be required to provide evidence that the development will not result in adverse effects on the integrity of the Severn Estuary SPA / Ramsar regarding its qualifying bird species. To demonstrate this, a survey will be required to determine the habitats and current site use to verify if the land parcel is indeed suitable for supporting a significant population of designated bird species. Where habitats are suitable, non-breeding bird surveys will be required to determine if the site and neighbouring land constitute a significant area of supporting habitat. Bird surveys will need to be undertaken during autumn, winter and spring. If habitat within the site or adjacent land are identified to support significant populations of designated bird species, avoidance measures and mitigation will be required, and the planning application will likely need to be assessed through a project specific Habitats Regulations Assessment to ensure that the development does not result in adverse effects on integrity.'

With regard to this recommendation, Monmouthshire Council expressed concern as to whether the extent of the suggested wording is needed as it is too prescriptive. Instead, the Deposit Plan addresses these recommendations by providing a less prescriptive form of wording in Policy NR1 – Nature Recovery and Geodiversity and its supporting text in paragraphs 11.10.2 – 11.10.8 under the heading International/National (Statutory) Sites and Protected Sites and Species. Site specific allocation policies also set out policy requirements, such as for Policy HA2 – Land to the East of Caldicot.

Water Quality

River Usk SAC and River Wye SAC

In the Preferred Strategy HRA no housing was allocated in Monmouth due to issues with nutrient neutrality. However, in response to that document the Welsh Government has advised Monmouthshire Council that new site allocations should be considered in Monmouth on the basis that sufficient certainty is provided by Dwr Cymru Welsh Water's (DCWW) planned improvements at the Monmouth Wastewater Treatment Works by 31st March 2025 . Monmouthshire Council produced a phosphate briefing note in July 2023 which updates developers and sets out how issues with nutrients in the River Usk and Wye catchments will be addressed. Given the clear commitment from DCWW to provide phosphate mitigation at the Llanfoist and Monmouth WwTWs by 31St March 2025, the Local Planning Authority is now able to issue planning permissions within the area served by these two WwTWs, subject to a suitably worded 'Grampian condition' preventing commencement of development until 31st March 2025. This will give confidence to the development industry and unlock stalled sites while ensuring new development proposals do not have an adverse impact on water quality within the river SACs.

Monmouthshire Council has confirmed that phosphate solutions have been agreed as part of a wider approach to the issue in partnership with Natural Resources Wales and Welsh Water. Natural Resources Wales has issued a new version of detailed planning guidance that has to be met satisfied in relation to both planning applications and allocations. This guidance will be considered as part of the HRA process. The RLDP allocations have been made in consultation with Welsh Water and Natural Resources Wales, having regard to headroom limits and phosphate solutions proposed Policy NR3 – Protection of Water Sources and the Water Environment sets out requirements for development which may impact upon the water environment and associated land. Given this, it is concluded that there would not be adverse effects on the site integrity of the River Usk SAC and the River Wye SAC regarding water quality.

Severn Estuary SAC/SPA/Ramsar

No water quality adverse effects on the integrity of the Severn Estuary SAC/SPA/Ramsar were identified during the appropriate assessment.

Water Quantity, Level and Flow

River Usk SAC and River Wye SAC

It was considered that no adverse effect on integrity would arise on River Usk SAC or River Wye SAC through this impact pathway due to Monmouthshire Replacement Local Development Plan. Moreover, the RLDP (see Policies S4 and S5) already contains some broad policy wording that protects European sites, which are reliant on water supply, from adverse effects. However, due to the sensitivity of these SACs to water abstraction, it is recommended that specific reference to the sites and the relevant flow targets established by Natural Resources Wales is made in the supporting text to either of these policies. The following text could be added to ensure greater protection of the rivers' flow regimes: 'Any development proposals have to ensure that there will be no adverse effects on the site integrity of the two riverine SACs, the River Usk SAC and the River Wye SAC, regarding water quantity, level and flow. In particular, development will not be permitted if it cannot be accommodated under the Review of Consents for flow in these rivers, including the maximum permissible percentage reduction from naturalised flow levels and hands-off flow conditions.'

Monmouthshire Council have commented that this has been considered as part of the plan making process in consultation with Welsh Water in relation to allocations. Proposals coming forward via planning applications are required to satisfy detailed planning guidance published by Natural Resources Wales so a specific DM policy is not considered necessary.

Severn Estuary SAC

No water quantity, level or flow adverse effects on the integrity of the Severn Estuary SAC/SPA/Ramsar were identified during the appropriate assessment.

Conclusion

With the changes made to the Local Plan in response to recommendations, it is considered that the Monmouthshire Local Plan contains a sufficient policy framework that no adverse effect would arise on Habitats sites either alone or in combination with other plans or projects.

1. Background

1.1 Introduction

AECOM was appointed by Monmouthshire County Council (MCC) to undertake a Habitats Regulations Assessment (HRA) of its Local Plan. The objective of this assessment is to identify any aspects of the Plan that would cause an adverse effect on the integrity of Habitats sites, otherwise known as European sites (Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and, as a matter of Government policy, Ramsar sites), either in isolation or in combination with other plans and projects, and to advise on appropriate policy mechanisms for delivering mitigation where such effects are identified.

This Local Plan (LP) is a replacement for the adopted LDP that covered the period between 2011 and 2021. The new LP will cover the years 2018 to 2033, building upon the previous LDP. The emerging LP is the Council's statutory land use plan, supporting the delivery of sustainable and resilient communities within Monmouthshire. The LP will determine where and how much development will take place in the County, but it will also outline which areas are to be protected from development.

An initial assessment of the designated sites within and surrounding Monmouthshire, and the associated impact pathways linking them to the Monmouthshire LP was undertaken. This indicates that several European sites require consideration, most notably the Severn Estuary SPA / Ramsar, the Severn Estuary SAC, the River Usk SAC, the River Wye SAC and two sites designated for bat species, which all lie partly within the authority. The UK is bound by the terms of the Habitats Directive (92/43/EEC). Under Article 6(3) of the Habitats Directive, an appropriate assessment is required, where a plan or project is likely to have a significant effect upon a European Site, either individually or 'in combination' with other projects.

An HRA was produced for the Preferred Strategy in 2022. This document is an updated HRA for the Deposit Plan.

1.2 Legislative Context

The need for an assessment of impacts on European sites is set out within Article 6 of the Habitats Directive and transposed into English and Welsh law by the Conservation of Habitats and Species Regulations 2017 (as amended). The ultimate aim of the Habitats Directive is to "***maintain or restore, at favourable conservation status, natural habitats and species of wild fauna and flora of Community interest***" (Article 2(2)). This aim relates to habitats and species, not the European Sites themselves, although the European Sites have a significant role in delivering favourable conservation status.

The UK left the EU on 31 January 2020 under the terms set out in the European Union (Withdrawal Agreement) Act 2020 ("the Withdrawal Act"). This established a transition period, which ended on 31 December 2020. The Withdrawal Act retains the body of existing EU-derived law within our domestic law, meaning that legislation relating to nature conservation continues to apply to and in the UK. The need for Appropriate Assessment is set out by the Conservation of Habitats and Species Regulations 2017 (as amended). The Habitats Directive applies the precautionary principle[3] to assessments of European Sites. Consent should only be granted for plans and projects once the relevant competent authority has ascertained that there will either be no likelihood of significant effects, or that a mechanism is in place to ensure that no adverse effect on the integrity of the European Site(s) in question arises. Where an Appropriate Assessment has been carried out and results in a negative assessment, or if uncertainty remains over the significant effect, consent can only be granted if there are no alternative solutions and there are Imperative Reasons of Over-riding Public Interest (IROPI) for the development and compensatory measures have been secured.

[3] The Precautionary Principle, which is referenced in Article 191 of the Treaty on the Functioning of the European Union, has been defined by the United Nations Educational, Scientific and Cultural Organisation (UNESCO, 2005) as:
"***When human activities may lead to morally unacceptable harm [to the environment] that is scientifically plausible but uncertain, actions shall be taken to avoid or diminish that harm. The judgement of plausibility should be grounded in scientific analysis***".

To ascertain whether site integrity will be affected, an Appropriate Assessment should be undertaken of the plan or project in question. Figure 1 provides the legislative basis for an Appropriate Assessment.

Habitats Directive 1992

Article 6 (3) states that:

"Any plan of project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives."

Conservation of Habitats and Species Regulations 2017 (as amended)

The Regulations state that:

"***A competent authority, before deciding to … give any consent for a plan or project which is likely to have a significant effect on a European site … must make an appropriate assessment of the implications for the plan or project in view of that site's conservation objectives… The competent authority may agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the European site."***

Figure 1. The legislative basis for Appropriate Assessment

Over the years, 'Habitats Regulations Assessment' (HRA) has come into wide currency to describe the overall process set out in the Habitats Regulations, from screening through to identification of IROPI. This has arisen in order to distinguish the overall process from the individual stage of "Appropriate Assessment". Throughout this Report the term HRA is used for the overall process and restricts the use of Appropriate Assessment to the specific stage of that name.

1.3 Scope of the Project

There is no pre-defined guidance that dictates the physical scope of an HRA of a Plan document. Therefore, in considering the physical scope of the assessment, we were guided primarily by the identified impact pathways (called the source-pathway-receptor model) rather than by arbitrary 'zones'. Current guidance suggests that the following European sites be included in the scope of assessment:

- All European sites within the boundary of the County of Monmouthshire; and,
- Other European sites within 15km shown to be linked to development within the County's boundary through a known 'pathway' (discussed below).

Briefly defined, impact pathways are routes by which the implementation of a policy within a Local Plan document can lead to an effect upon a European designated site. An example of this would be new residential development resulting in an increased population and thus increased recreational pressure, which could then affect European sites by, for example, disturbance of wintering or breeding birds. Guidance from the English Ministry of Housing, Communities and Local Government (MHCLG) states that the HRA should be '***proportionate to the geographical scope of the*** [plan policy]' and that '***an AA need not be done in any more detail, or using more resources, than is useful for its purpose***' (MHCLG, 2006, p.6).

While MHCLG does not have authority in Wales, this basic principle has also been reflected in court rulings. The Court of Appeal[4] has ruled that providing the Council (competent authority) was duly satisfied that proposed mitigation could be 'achieved in practice' to satisfy that the proposed development would have no adverse effect, then this would suffice. This ruling has since been applied to a planning permission (rather than a Core Strategy document)[5]. In this case the High Court ruled that for '***a multistage process, so long as there is sufficient information at any particular stage to***

[4]No Adastral New Town Ltd (NANT) v Suffolk Coastal District Council Court of Appeal, 17th February 2015
[5]High Court case of R (Devon Wildlife Trust) v Teignbridge District Council, 28 July 2015

enable the authority to be satisfied that the proposed mitigation can be achieved in practice it is not necessary for all matters concerning mitigation to be fully resolved before a decision maker is able to conclude that a development will satisfy the requirements of Reg 61 of the Habitats Regulations'.

Given an initial assessment of the relevant European sites and the impact pathways present, and referring to the HRA work that was undertaken for the adopted LDP, this HRA will discuss the following European sites:

- Usk Bat Sites SAC
- Cwm Clydach Woodlands SAC
- Wye Valley Woodlands SAC
- Severn Estuary SAC
- River Wye SAC
- Avon Gorge Woodlands SAC
- Severn Estuary SPA / Ramsar
- River Usk SAC
- Wye Valley and Forest of Dean Bat Sites SAC
- Aberbargoed Grasslands SAC
- Sugar Loaf Woodlands SAC
- Llangorse Lake SAC; and
- Coed y Cerrig SAC

An introduction to these sites, their qualifying features (species and habitats), conservation objectives, and threats and pressures to site integrity are set out in Chapter 3 of this report.

In order to fully inform the screening process, several studies and information databases have been consulted to determine Likely Significant Effects (LSEs) that could arise from the draft LP. These include:

- Future development proposed (and, where available, HRAs) for the adjoining authorities of Powys, Torfaen, Newport, Blaenau Gwent, Herefordshire, Forest of Dean, South Gloucestershire and Bristol;
- Road traffic statistics from the Department for Transport (https://roadtraffic.dft.gov.uk);
- Journey-to-work data from the Population Census 2011 (https://www.nomisweb.co.uk/census/2011/WU03UK);
- Visitor surveys carried out in Lydney6 and Stroud District7, as they are both relevant to the Severn Estuary SPA / Ramsar;
- The HRA produced for the adopted Monmouthshire LDP;
- Core Management Plans for relevant European sites;
- The UK Air Pollution Information System (www.apis.ac.uk); and
- Multi Agency Geographic Information for the Countryside (MAGIC) and its links to SSSI citations and the JNCC website (www.magic.gov.uk).
- Habitat mapping on the Wales Environmental Information Portal8; and

[6] Liley D., Panter C. & Hoskin R. 2017. Lydney Severn Estuary Visitor Survey and Recreation Strategy. Unpublished report by Footprint Ecology for the Forest of Dean District Council. 55pp. Available at: https://www.footprint-ecology.co.uk/reports/Liley%20et%20al%202017%20Lydney%20Severn%20Estuary%20Visitor%20Survey%20and%20Recreation%20Strategy.pdf

[7] Southgate J. & Colebourn K. 2016. Severn Estuary (Stroud District) Visitor Survey Report. Report for Stroud District Council. Ecological Planning & Research, Winchester. 68pp. Available at: https://www.stroud.gov.uk/media/2902/severnestuaryvs_report_15581c_final_060616.pdf

[8] Available online at: https://naturalresources.wales/evidence-and-data/accessing-our-data/beta-environmental-data/?lang=en [Accessed on the 11/06/2021]

- DTA Habitats Regulations Assessment Handbook[9].

1.4 Quality Assurance

This report was undertaken in line with AECOM's Integrated Management System (IMS). Our IMS places great emphasis on professionalism, technical excellence, quality, environmental and Health and Safety management. All staff members are committed to establishing and maintaining our certification to the international standards BS EN ISO 9001:2008 and 14001:2004 and BS OHSAS 18001:2007. In addition, our IMS requires careful selection and monitoring of the performance of all sub-consultants and contractors.

All AECOM Ecologists working on this project are members (at the appropriate level) of the Chartered Institute of Ecology and Environmental Management (CIEEM) and follow their code of professional conduct (CIEEM, 2017).

2. Methodology

2.1 Introduction

The HRA has been carried out with reference to the general EC guidance on HRA[10] and the Welsh Government's guidance on HRA: Technical Advice Note 5 (Nature Conservation and Planning) 2009 and The Planning Series: 16 – Habitats Regulations Assessment. AECOM has also been mindful of the implications of European case law in 2018, notably the Holohan ruling and the People over Wind ruling, both discussed below.

Figure 2 below outlines the stages of HRA according to current EC guidance. The stages are essentially iterative, being revisited as necessary in response to more detailed information, recommendations and any relevant changes to the plan until no significant adverse effects remain.

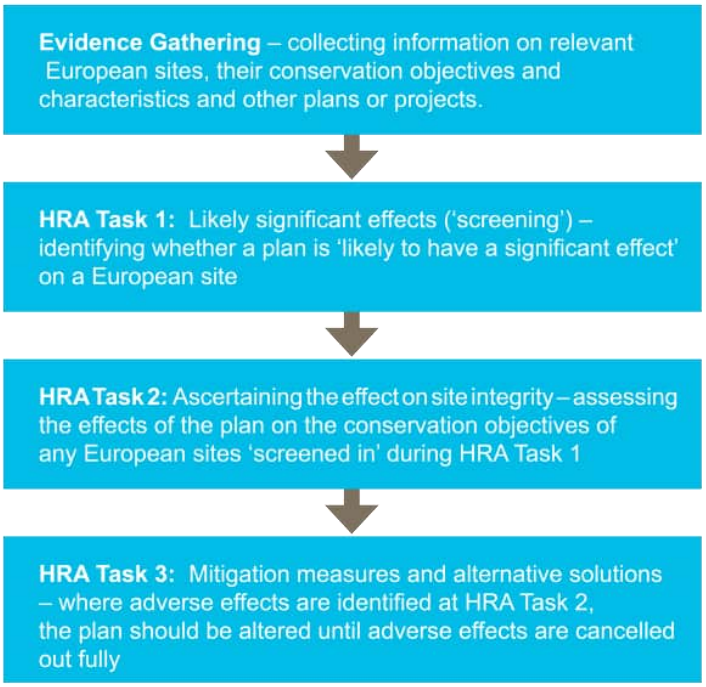

Figure 2. Four Stage Approach to Habitats Regulations Assessment. Source EC, 2001[1].

[9] Available online at: https://www.dtapublications.co.uk/ [Accessed on the 11/06/2021]
[10] European Commission (2001): Assessment of plans and projects significantly affecting Natura 2000 Sites: Methodological Guidance on the Provisions of Article 6(3) and 6(4) of the Habitats Directive.

2.2 Description of HRA Tasks

2.2.1 HRA Task 1 – Likely Significant Effects (LSE)

Following evidence gathering, the first stage of any Habitats Regulations Assessment is a Likely Significant Effect (LSE) test - essentially a risk assessment to decide whether the full subsequent stage known as Appropriate Assessment is required. The essential question is:

"Is the project, either alone or in combination with other relevant projects and plans, likely to result in a significant effect upon European sites?"

The objective is to 'screen out' those plans and projects that can, without any detailed appraisal, be said to be unlikely to result in significant adverse effects upon European sites, usually because there is no mechanism for an adverse interaction with European sites. This stage is undertaken in Chapter 4 of this report and in Appendix A.

2.2.2 HRA Task 2 – Appropriate Assessment (AA)

Where it is determined that a conclusion of 'no likely significant effect' cannot be drawn, the analysis has proceeded to the next stage of HRA known as Appropriate Assessment. Case law has clarified that 'appropriate assessment' is not a technical term. In other words, there are no particular technical analyses, or level of technical analysis, that are classified by law as belonging to appropriate assessment rather than determination of likely significant effects.

By virtue of the fact that it follows Screening, there is a clear implication that the analysis will be more detailed than undertaken at the Screening stage and one of the key considerations during appropriate assessment is whether there is available mitigation that would entirely address the potential effect. In practice, the appropriate assessment would take any policies or allocations that could not be dismissed following the high-level Screening analysis and analyse the potential for an effect in more detail, with a view to concluding whether there would actually be an adverse effect on integrity (in other words, disruption of the coherent structure and function of the European site(s)).

A decision by the European Court of Justice[11] concluded that measures intended to avoid or reduce the harmful effects of a proposed project on a European site may no longer be taken into account by competent authorities at the Likely Significant Effects or 'screening' stage of HRA. That ruling has been taken into account in producing this HRA.

Also in 2018 the Holohan ruling[12] was handed down by the European Court of Justice. Among other provisions paragraph 39 of the ruling states that '***As regards other habitat types or species, which are present on the site, but for which that site has not been listed, and with respect to habitat types and species located outside that site, … typical habitats or species must be included in the appropriate assessment, if they are necessary to the conservation of the habitat types and species listed for the protected area***' [emphasis added]. Due account of this decision has been taken in this HRA, particularly regarding habitat outside the Usk Bat Sites SAC, Wye Valley & Forest of Dean Bat Sites SAC and Severn Estuary SPA / Ramsar but which may be important for sustaining the SAC bat populations and SPA / Ramsar bird populations.

2.2.3 HRA Task 3 – Avoidance and Mitigation

Where necessary, measures are recommended for incorporation into the Plan in order to avoid or mitigate adverse effects on European sites. There is considerable precedent concerning the level of detail that a Local Plan document needs to contain regarding mitigation for recreational impacts on European sites. The implication of this precedent is that it is not necessary for all measures that will be deployed to be fully developed prior to adoption of the Plan, but the Plan must provide an adequate policy framework within which these measures can be delivered.

[11] People Over Wind and Sweetman v Coillte Teoranta (C-323/17)
[12] Case C-461/17

In evaluating significance, AECOM has relied on professional judgement as well as the results of previous stakeholder consultation regarding development impacts on the European sites considered within this assessment.

When discussing 'mitigation' for a Local Development Plan document, one is concerned primarily with the policy framework to enable the delivery of such mitigation rather than the details of the mitigation measures themselves since the Local Development Plan document is a high-level policy document.

3. Designated Habitat Sites

3.1 Usk Bat Sites SAC

3.1.1 Introduction

The SAC comprises a wide variety of different habitats, including bogs and marshes (40.2%), heath and scrub (32.2%), Alpine and sub-alpine grassland (3.9%), dry grassland and steppes (3.8%) and broad-leaved deciduous woodland (3.4%).

Mynydd Llangatwg, the area making up large parts of the SAC, consists mainly of open moorland and bog, and represents one of the largest sections of exposed upland limestone crag in south Wales. The Craig y Cilau National Nature Reserve (NNR), which covers a large portion of the limestone escarpment, comprises areas of limestone grassland, scree, woodland and scrub. An extensive system of caves and sinkholes has developed beneath the Mynydd Llangatwg.

The NNR has been established primarily to protect the lesser horseshoe bat roosts in the caves, a primary reason for selection of this site as a SAC. However, the site also supports a noteworthy assemblage of plants, such as the small-leaved lime, several species of whitebeam, limestone fern, endemic hawkweeds and he alpine enchanter's-nightshade. The various micro-habitats on the cliffs and boulders harbour a typical range of fern, bryophytes and calcareous lichens. Notable lichen species include the jelly lichen ***Collema cristatum***, ***Leproplacetum chryssodetae*** and ***Aspicilion calcarean***.

Other Annex I habitats are also present, but not a primary reason for site selection. For example, these include Tilio-Acerion forest along the cliffs, which support rare whitebeams and are intermixed with beechwood in the Clydach Gorge. This SAC is located partly within the north-west corner of Monmouthshire near Gilwern.

3.1.2 Qualifying Features[13]

The site has been designated as a SAC for the following features:

Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site:

- European dry heaths
- Degraded raised bogs still capable of natural regeneration
- Blanket bogs
- Calcareous rocky slopes with chasmophytic vegetation
- Caves not open to the public
- ***Tilio-Acerion*** forests of slopes, screes and ravines

Annex II species that are **a primary reason** for selection of this site

- Lesser horseshoe bat Rhinolophus hipposideros

[13] https://sac.jncc.gov.uk/site/UK0014784

3.1.3 Conservation Objectives[14]

The overarching conservation objectives are outlined in the Core Management Plan for the Usk Bat Sites published by Natural Resources Wales. While this document also provides conservation vision statements for the Annex I habitats, only the conservation objectives for the primary site feature are outlined below.

The vision for this feature is for it to be in a favourable conservation status, where all of the following conditions are satisfied:

- The site will support a sustainable population of lesser horseshoe bats in the River Usk area;
- The population will be viable in the long term, acknowledging the population fluctuations of the species;
- Buildings, structures and habitats on the site will be in optimal condition to support the populations;
- Sufficient foraging habitat is available, in which factors such as disturbance, interruption to flight lines, and mortality from predation or vehicle collision, changes in habitat management that would reduce the available food source are not at levels which could cause any decline in population size or range;
- Management of the surrounding habitats is of the appropriate type and sufficiently secure to ensure there is likely to be no reduction in population size or range, nor any decline in the extent or quality of breeding, foraging or hibernating habitat;
- There will be no loss or decline in quality of linear features (such as hedgerows and tree lines) which the bats use as flight lines;
- There will be no loss of foraging habitat use by the bats or decline in its quality, such as due to over-intensive woodland management; and
- All factors affecting the achievement of the above conditions are under control.

3.1.4 Threats / Pressures to Site Integrity[15]

While there is no Site Improvement Plan for the SAC, the main pressures and threats to site integrity can be inferred from the site's Core Management Plan, which outlines the management techniques that are required to achieve the conservation objectives for the SAC.

The main threats and pressures to the site integrity of the SAC are the following:

- Recreational pressure
- Inappropriate management of main habitats
- Inappropriate water level (in bogs)
- Inappropriate grazing levels
- Impact of atmospheric nitrogen deposition
- Quarrying / mining in the area
- Risk of arson / wildfires

3.2 Cwm Clydach Woodlands SAC

3.2.1 Introduction

The Cwm Clydach Woodlands SAC mainly comprises broad-leaved deciduous woodland (88.9%), heath and scrub (9.4%), and some dry grassland and steppes (1.7%). Primarily, the site is

[14] https://naturalresources.wales/media/674281/Usk%20Bat%20Sites%20Management%20Plan%20Feb%2008.pdf. As published by Natural Resources Wales
[15] https://naturalresources.wales/media/674281/Usk%20Bat%20Sites%20Management%20Plan%20Feb%2008.pdf

characterised by ***Asperulo-Fagetum*** beech forests that lie close to the limit of their north-western distribution in the UK and within Europe. The main part of the wood is on a steep valley side with a mature canopy of large trees and abundant deadwood. There are also transitions to more acidic beech woodland.

The SAC harbours some rare and characteristic plant species including the whitebeam ***Sorbus porrigentiformis***, mountain sedge ***Carex montana***, yellow bird's-nest ***Monotropa hypopitys*** and bird's-nest orchid ***Neottia nidus-avis***. This SAC lies in the north-west corner of the County near Gilwern.

3.2.2 Qualifying Features[16]

The site has been designated as a SAC for the following features:

Annex I habitats that are a primary reason for selection of this site:

- Asperulo-Fagetum beech forests

Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site:

- Atlantic acidophilous beech forests with ***Ilex*** and sometimes also ***Taxus*** in the shrublayer

3.2.3 Conservation Objectives[17]

The overarching conservation objectives are outlined in the Core Management Plan for the Cwm Clydach Woodland published by Natural Resources Wales. While this document also provides conservation vision statements for the non-primary Annex I habitat, only the conservation objectives for the primary site feature are outlined below.

The vision for this feature is for it to be in a favourable conservation status, where all of the following conditions are satisfied:

- At least 50% of the canopy-forming trees are beech;
- The canopy cover is at least 80% (excluding areas of crag) and composed of locally native trees;
- The woodland has trees of all age classes with a scattering of standing and fallen dead wood;
- Regeneration of trees is sufficient to maintain the woodland cover in the long term;
- The shrub layer and ground flora can be quite sparse, but where present consist of locally native plants such as yew, hawthorn, wych elm, ash, hazel, field maple and elder, bramble, dog's mercury, enchanter's-nightshade, lords-and-ladies, woodruff, male fern, sanicle, wood melick, ivy, false brome, violets, herb robert, wood avens, and tufted hair-grass;
- Scarcer plants, such as soft-leaved sedge and bird's-nest orchid are locally frequent and, more rarely, yellow bird's-nest orchid can be found; and
- All factors affecting the achievement of the above conditions are under control.

3.2.4 Threats and Pressures to Site Integrity[18]

While there is no Site Improvement Plan for the SAC, the main pressures and threats to site integrity can be inferred from the site's Core Management Plan, which outlines the management techniques that are required to achieve the conservation objectives for the SAC.

The main threats and pressures to the site integrity of the SAC are the following:

- Recreational disturbance (fly-tipping)
- Inappropriate habitat management
- Inappropriate grazing levels

[16] https://sac.jncc.gov.uk/site/UK0030127
[17] https://naturalresources.wales/media/675017/cwm-clydach-sac-plan-english.pdf. As published by Natural Resources Wales
[18] https://naturalresources.wales/media/675017/cwm-clydach-sac-plan-english.pdf

- Invasive species

3.3 River Usk SAC

3.3.1 Introduction

The River Usk SAC originates in the west of the Bannau Brycheiniog National Park and flows south-east, joining the Severn Estuary at Newport. The overall form of the catchment is long and narrow, with steep tributaries inflowing along the way to the Severn Estuary. The underlying geology is primarily Devonian Old Red Sandstone resulting in well buffered low-acidity waters. This geology also drives the low-moderate nutrient that characterises the SAC. However, along its course the nutrient status of the SAC is significantly modified by land use within the catchment, which is mainly pastoral and occasional woodland forestry.

The ecological structure and function of the site is highly dependent on hydrological and geomorphological processes, as well as the quality and connectivity of riparian habitats. This is especially the case for mobile animals, such as migratory fish and otters that move throughout the site. For example, the maintenance of a good hydrological regime (i.e. water quality and flows) and a consequent maintenance of current velocity, water depth, dissolved oxygen levels and nutrient status are integral for fish to move around the river.

Example of the species that the SAC is designated for include the sea lamprey ***Petromyzon marinus***, Atlantic salmon ***Salmo salar*** and bullhead ***Cottus gobio***. Especially the Atlantic salmon requires unmodified river channels and an obstruction-free migratory route to its spawning gravels. The River Usk SAC is also an important site for otters, acting as a refuge for the species in the 1950s and subsequently as a source population for the re-colonisation of south-east Wales. This SAC river flows through Monmouthshire.

3.3.2 Qualifying Features[19]

The site has been designated as a SAC for the following features:

Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site:

- Water courses of plain to montane levels with the ***Ranunculion fluitantis*** and ***Callitricho-Batrachion*** vegetation

Annex II species that are a primary reason for selection of this site:

- Sea lamprey Petromyzon marinus
- Brook lamprey Lampetra planeri
- River lamprey Lampetra fluviatilis
- Twaite shad ***Alosa fallax***
- Atlantic salmon ***Salmo salar***
- Bullhead ***Cottus gobio***
- Otter ***Lutra lutra***

Annex II species present as a qualifying feature, but not a primary reason for site selection:

- Allis shad ***Alosa alosa***

3.3.3 Conservation Objectives[20]

The overarching conservation objectives are outlined in the Core Management Plan for the River Usk SAC published by Natural Resources Wales. While this document provides conservation vision

[19] https://sac.jncc.gov.uk/site/UK0013007
[20] https://naturalresources.wales/media/673384/River_Usk%20SAC%20core%20plan.pdf. As published by Natural Resources Wales

statements for all Annex II species, only the conservation objectives for the water course are presented here, as this is essential to maintain the species in favourable conservation status.

- The capacity of the habitats in the SAC to support each feature at near-natural population levels, as determined by predominantly unmodified ecological and hydromorphological processes and characteristics, should be maintained as far as possible, or restored where necessary;
- The ecological status of the water environment should be sufficient to maintain a stable or increasing population of each feature. This will include elements of water quantity and quality, physical habitat and community composition and structure. It is anticipated that these limits will concur with the relevant standards used by the Review of Consents process given in Annexes 1-3;
- Flow regime, water quality and physical habitat should be maintained in, or restored as far as possible to, a near-natural state, in order to support the coherence of ecosystem structure and function across the whole area of the SAC;
- All known breeding, spawning and nursery sites of species features should be maintained as suitable habitat as far as possible, except where natural processes cause them to change;
- Flows, water quality, substrate quality and quantity at fish spawning sites and nursery areas will not be depleted by abstraction, discharges, engineering or gravel extraction activities or other impacts to the extent that these sites are damaged or destroyed;
- The river planform and profile should be predominantly unmodified. Physical modifications having an adverse effect on the integrity of the SAC, including, but not limited to, revetments on active alluvial river banks using stone, concrete or waste materials, unsustainable extraction of gravel, addition or release of excessive quantities of fine sediment, will be avoided;
- River habitat SSSI features should be in favourable condition. In the case of the Usk Tributaries SSSI, the SAC habitat is not underpinned by a river habitat SSSI feature. In this case, the target is to maintain the characteristic physical features of the river channel, banks and riparian zone;
- Artificial factors impacting on the capability of each species feature to occupy the full extent of its natural range should be modified where necessary to allow passage, eg. weirs, bridge sills, acoustic barriers;
- Natural factors such as waterfalls, which may limit the natural range of a species feature or dispersal between naturally isolated populations, should not be modified;
- Flows during the normal migration periods of each migratory fish species feature will not be depleted by abstraction to the extent that passage upstream to spawning sites is hindered;
- Flow objectives for assessment points in the Usk Catchment Abstraction Management Strategy will be agreed between EA and Natural Resources Wales as necessary. It is anticipated that these limits will concur with the standards used by the Review of Consents process given in Annex 1 of this document;
- Levels of nutrients, in particular phosphate, will be agreed between EA and Natural Resources Wales for each Water Framework Directive water body in the Usk SAC, and measures taken to maintain nutrients below these levels. It is anticipated that these limits will concur with the standards used by the Review of Consents process given in Annex 2 of this document;
- Levels of water quality parameters that are known to affect the distribution and abundance of SAC features will be agreed between EA and Natural Resources Wales for each Water Framework Directive water body in the Usk SAC, and measures taken to maintain pollution below these levels. It is anticipated that these limits will concur with the 16 standards used by the Review of Consents process given in Annex 3 of this document;
- Potential sources of pollution not addressed in the Review of Consents, such as contaminated land, will be considered in assessing plans and projects; and
- Levels of suspended solids will be agreed between EA and Natural Resources Wales for each Water Framework Directive water body in the Usk SAC. Measures including, but not limited to, the control of suspended sediment generated by agriculture, forestry and engineering works, will be taken to maintain suspended solids below these levels.

3.3.4 Threats and Pressures to Site Integrity[21]

While there is no Site Improvement Plan for the SAC, the main pressures and threats to site integrity can be inferred from the site's Core Management Plan, which outlines the management techniques that are required to achieve the conservation objectives for the SAC.

The main threats and pressures to the site integrity of the SAC are the following:

- Inappropriate habitat management (e.g. barriers to migration)
- Water quality
- Water flow / level
- Noise / acoustic disturbance
- Non-marine fisheries: recreational and commercial
- Increased sedimentation / siltation

3.4 Aberbargoed Grasslands SAC

3.4.1 Introduction

The Aberbargoed Grasslands SAC comprises multiple habitats, including humid grassland (48%), broad-leaved deciduous woodland (32.6%), and heath and scrub (12.8%). The SAC covers 42.5ha and lies on a southwest facing hillside in the Rhymney Valley, 1km east of Bargoed and thus occupying an urban fringe position.

The fields in the south-western part of the site have reduced drainage and harbour a mixture of marshy grassland communities. Areas of high conservation value include abundant purple moor grass ***Molinia caerulea***, meadow thistle ***Cirsium dissectum***, devil's bit scabious ***Succisa pratensis*** and carnation sedge ***Carex panicea***. Associated stands of ***Molinia caerulea*** – ***Potentilla erecta*** mire contain abundant purple moor grass with other important plant species, such as common sedge ***Carex nigra*** and spotted orchid ***Dactylorhiza maculata***. This SAC lies approximately 12km west of Monmouthshire.

3.4.2 Qualifying Features[22]

The site has been designated as a SAC for the following features:

Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site:

- Molinia meadows on calcareous, peaty or clayey-silt laden soils (***Molinion caeruleae***)

Annex II species that are a primary reason for selection of this site:

- Marsh fritillary butterfly ***Euphydryas aurinia***

3.4.3 Conservation Objectives[23]

The overarching conservation objectives are outlined in the Core Management Plan for the Aberbagoed Grasslands SAC published by Natural Resources Wales. While this document also provides conservation vision statements for the Annex I habitat, only the conservation objectives for the primary qualifying feature are presented here.

The vision for this feature is for it to be in a favourable conservation status, where all of the following conditions are satisfied:

[21] https://naturalresources.wales/media/673384/River_Usk%20SAC%20core%20plan.pdf.
[22] https://sac.jncc.gov.uk/site/UK0030071
[23] https://naturalresources.wales/media/670637/Aberbargoed%20Grasslands%20Core%20SAC%20plan%20jan08.pdf. As published by Natural Resources Wales

- The site will support a sustainable metapopulation of the marsh fritillary in the Aberbargoed area. This will require at least 50ha of suitable habitat, although not all of this will be within the SAC;
- The population will be viable in the long term, acknowledging the extreme population fluctuations of the species;
- Habitats on the site will be in optimal condition to support the metapopulation;
- At least 25ha of the total site area will be marshy grassland suitable for supporting marsh fritillary, with ***Succisa pratensis*** present and only a low cover of scrub;
- At least 6.25ha will be good marsh fritillary breeding habitat, dominated by purple moor-grass ***Molinia caerulea***, with ***S. pratensis*** present throughout and a vegetation height of 10-20cm over the winter period; and
- All factors affecting the achievement of the foregoing conditions are under control.

3.4.4 Threats and Pressures to Site Integrity[24]

While there is no Site Improvement Plan for the SAC, the main pressures and threats to site integrity can be inferred from the site's Core Management Plan, which outlines the management techniques that are required to achieve the conservation objectives for the SAC.

The main threats and pressures to the site integrity of the SAC are the following:

- Appropriate grazing levels
- Recreational pressure

3.5 Sugar Loaf Woodlands SAC

3.5.1 Introduction

The Sugar Loaf Woodlands SAC comprises 173.1ha of broad-leaved deciduous woodland (76.7%), and heath and scrub (23.3%). It is the largest area of old sessile oak woods near the south-eastern fringe of the habitat's range in the UK and Europe. Due to the relatively dry conditions in the SAC, the development of the Atlantic flora is restricted. However, the main plant components of the site are sessile oak ***Quercus petraea***, bilberry ***Vaccinium myrtillus***, wavy hair-grass ***Deschampsia flexuosa***, and extensive fern and bryophyte cover. While the woodland is grazed, it regenerates around the fringes, where transitions to upland grassland and heathland communities occur. This SAC lies within Monmouthshire, close to Abergavenny.

3.5.2 Qualifying Features[25]

The site has been designated as a SAC for the following features:

Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site:

- ***Molinia*** meadows on calcareous, peaty or clayey-silt laden soils (***Molinion caeruleae***)

Annex II species that are a primary reason for selection of this site:

- Marsh fritillary butterfly ***Euphydryas aurinia***

3.5.3 Conservation Objectives[26]

The overarching conservation objectives are outlined in the Core Management Plan for the Sugar Loaf Woodlands SAC published by Natural Resources Wales.

[24] https://naturalresources.wales/media/670637/Aberbargoed%20Grasslands%20Core%20SAC%20plan%20jan08.pdf.
[25] https://sac.jncc.gov.uk/site/UK0030072
[26] https://naturalresources.wales/media/674063/Sugar_Loaf_Woodlands_core_management_plan_Mar_2008%20_A_.pdf. As published by Natural Resources Wales

The vision for this feature is for it to be in favourable conservation status within the site, as a functioning and regenerating* oak wood, where all of the following conditions are satisfied:

- The wooded area is no less than 122 ha;
- The remainder of the site is semi-natural acid grassland, heathland, bracken and scrub, often forming a transition zone at the woodland edge;
- Saplings of birch ***betula*** spp, oak ***Quercus petraea***, alder ***Alnus glutinosa*** or holly ***Ilex aquifolium*** dominate the tree regeneration;
- Young beech ***Fagus sylvatica*** and sycamore ***Acer pseudoplatanus*** trees are rare;
- The woodland ground flora is composed of a range of typical native plants including bilberry ***Vaccinium myrtillus***, wavy-hair grass ***Deschampsia flexuosa*** and the mosses ***Plagiothecium undulatum***, ***Rhytidiadelphus loreus***, ***Dicranum majus***;
- The liverwort ***Bazzania trilobata*** to continue to be present in its core area of Unit 1; and
- All factors affecting the achievement of these conditions will under control.

* A "functioning and regenerating oak woodland" would include all the positive attributes described in the performance indicators.

3.5.4 Threats and Pressures to Site Integrity[27]

While there is no Site Improvement Plan for the SAC, the main pressures and threats to site integrity can be inferred from the site's Core Management Plan, which outlines the management techniques that are required to achieve the conservation objectives for the SAC.

The main threats and pressures to the site integrity of the SAC are the following:

- Inappropriate habitat management
- Invasive species

3.6 Llangorse Lake SAC

3.6.1 Introduction

The Llangorse Lake SAC comprises several habitats, including inland water bodies (56.8%), bogs and marshes (11.9%), humid grassland (8.9%), improved grassland (16%) and broad-leaved deciduous woodland (5.1%). Its main feature is a large shallow lake with a mean depth of 2-3 metres, lying in a natural depression of Devonian Old Red Sandstone. It is the largest natural lowland water in south Wales and one of the few natural eutrophic lakes in Britain.

The site's mineral-rich geology has encouraged growth of a wide range of aquatic and marginal plants, including several species that are rare in Wales. The SAC shows a gradation from open water with submerged and floating plant beds, to patches of willow scrub and wet woodland. The lake has a diverse plankton community supporting a wide variety of invertebrates, including many rare species. Its flora is dominated by pondweed, such as yellow water-lily ***Potamogetonaceae – Nupharetum*** associations. The shoreline flora is largely dominated by club-rush-common reed ***Scirpo - Phragmitetum*** associtaions. It is also rich in shining pondweed ***Potamogeton lucens***. This SAC lies approximately 11km north-west of Monmouthshire.

3.6.2 Qualifying Features[28]

The site has been designated as a SAC for the following features:

Annex I habitats that are a primary reason for selection of this site:

- Natural eutrophic lakes with ***Magnopotamion*** or ***Hydrocharition*** – type vegetation

[27] https://naturalresources.wales/media/674063/Sugar_Loaf_Woodlands_core_management_plan_Mar_2008%20_A_.pdf.
[28] https://sac.jncc.gov.uk/site/UK0012985

3.6.3 Conservation Objectives[29]

The overarching conservation objectives are outlined in the Core Management Plan for the Llangorse Lake SAC published by Natural Resources Wales.

Natural eutrophic lakes with ***Magnopotamion*** or ***Hydrocharition*** – type vegetation

- There is no loss of lake area, as defined in 2006 aerial photographs for summer levels;
- The aquatic plant community is typical of this lake type in terms of composition and structure, including species such as water-starworts, stoneworts, duckweeds, broad-leaved and fineleaved pondweeds, water lilies, amphibious bistort, water-crowfoots, rigid hornwort, spiked water-milfoil, mare's-tail and horned pondweed;
- Plants indicating very high nutrient levels and excessive silt loads are not dominant and invasive non-native water plants do not threaten to out-compete the native flora;
- The nutrient, pH and dissolved oxygen levels are typical for a lake of this type and there is no excessive growth of cyanobacteria or green algae;
- There is a natural hydrological regime;
- The natural shoreline is maintained;
- The natural and characteristic substrate is maintained;
- The natural sediment load maintained; and
- All factors affecting the achievement of these conditions are under control.

3.6.4 Threats and Pressures to Site Integrity[30]

While there is no Site Improvement Plan for the SAC, the main pressures and threats to site integrity can be inferred from the site's Core Management Plan, which outlines the management techniques that are required to achieve the conservation objectives for the SAC.

The main threats and pressures to the site integrity of the SAC are the following:

- Water quality
- Sedimentation
- Non-native invasive species
- Loss of surrounding habitats

3.7 Coed y Cerrig SAC

3.7.1 Introduction

The Coed y Cerrig SAC is 8.99ha in size and comprises two main habitats, namely broad-leaved deciduous woodland (91.2%), and bogs and marshes (6.6%). The SAC is a good example of alluvial forest in southern Wales. It lies in the bottom of a valley and its canopy is dominated by alder ***Alnus glutinosa*** and ash ***Fraxinus excelsior***, and a rich understorey with guelder-rose ***Viburnum opulus*** and bird cherry ***Prunus padus***. Its ground flora includes large sedges ***Carex*** spp. and wet woodland species. There are gradations to ash-elm ***Fraxinus-Ulmus*** and oak ***Quercus*** spp. on the valley sides. The site includes a large area of species-rich fen meadow and some rush pasture.

Historically, the wet alder dominated woodland has been managed through a mixture of coppicing and grazing. Coppice management was traditionally undertaken to provide timber for the charcoal and clog making industries but seized before the Second World War. The dry woodland sections were managed for oak and beech timber. The SAC is located within north Monmouthshire.

[29] https://naturalresources.wales/media/672671/Llangorse%20lake%20core%20management%20plan.pdf. As published by the Natural Resources Wales (2008).
[30] https://naturalresources.wales/media/672671/Llangorse%20lake%20core%20management%20plan.pdf.

3.7.2 Qualifying Features[31]

The site has been designated as a SAC for the following features:

Annex I habitats that are a primary reason for selection of this site:

- Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae)

3.7.3 Conservation Objectives[32]

The overarching conservation objectives are outlined in the Core Management Plan for the Coed y Cerrig SAC published by Natural Resources Wales.

Alluvial forests with ***Alnus glutinosa*** and ***Fraxinus excelsior*** (***Alno-Padion***, ***Alnion incanae***, ***Salicion albae***)

- Around a third of the site is covered by wet alder and willow woodland;
- This wet woodland grades into areas of permanent open swamp dominated by lesser pond-sedge or other typical wetland plants, where the hydrological conditions are suitable. Adjacent areas of marshy grassland and spring-fed mire are intimately linked to the wet woodland and swamp;
- The remainder of the site supports mainly dry semi-natural woodland;
- The wet woodland has a variable canopy structure, based on a small-scale patchwork, with alder of different ages and some standing as well as fallen dead wood. Ash does not make up more than 25% of the canopy;
- Young trees/saplings and/or vegetative re-growth of the above species are present;
- The understorey includes locally native shrubs typical of this habitat and the ground flora consists of a variety of typical wetland plants, such as lesser pond-sedge, common marsh-bedstraw, meadowsweet, yellow pimpernel, opposite-leaved golden-saxifrage, marsh-marigold, hemlock water-dropwort, water mint, lady fern and rushes;
- Plants associated with nutrient enrichment, such as stinging nettle and cleavers, are not dominant over large areas and invasive alien plants like Japanese knotweed and Indian balsam are absent;
- This wet woodland grades into areas of permanent open swamp dominated by lesser pond-sedge or other typical wetland plants, where the hydrological conditions are suitable. Adjacent areas of marshy grassland and spring-fed mire are intimately linked to the wet woodland and swamp;
- There is no significant input of nutrient-rich water from ditches and surrounding land; and
- All factors affecting the achievement of these conditions are under control.

3.7.4 Threats and Pressures to Site Integrity[33]

While there is no Site Improvement Plan for the SAC, the main pressures and threats to site integrity can be inferred from the site's Core Management Plan, which outlines the management techniques that are required to achieve the conservation objectives for the SAC.

The main threats and pressures to the site integrity of the SAC are the following:

- Inadequate woodland management

[31] https://sac.jncc.gov.uk/site/UK0012766

[32] https://naturalresources.wales/media/671319/Coed%20y%20Cerrig%20%20SAC%20%20Management%20Plan%20_English_.pdf. As published by Natural Resources Wales

[33] https://naturalresources.wales/media/671319/Coed%20y%20Cerrig%20%20SAC%20%20Management%20Plan%20_English_.pdf.

- Inappropriate grazing levels
- Inappropriate hydrological regime
- Atmospheric pollution
- Recreational pressure

3.8 Severn Estuary SPA / Ramsar

3.8.1 Introduction

The Severn Estuary SPA / Ramsar is located between the borders of Wales and England in south-western Britain. It is a 24,700.91ha large estuary with extensive intertidal mudflats, sandflats, rocky platforms and small islands. The coastline is fringed by saltmarsh, grazing marsh, freshwater and brackish ditches. Its seabed is mainly rocky, gravelly and sub-tidal sandbanks. Due to the estuary's funnel shape, the Severn experiences the second highest tidal range in the world.

Because of this extreme tidal condition, the SPA / Ramsar is inhabited by plant and animal assemblages that tolerate the physical conditions in the tidal-swept liquid mud, sand and rock. The invertebrate community is species-poor and harbours high densities of ragworms and lugworms. These form important food sources for migrant and wintering waders. The SPA / Ramsar has particular importance as a stopover point for spring and autumn migrant waders, and overwintering swans, ducks and waders. The site also has an extensive intertidal zone, as a consequence of its tidal range. The SPA forms the southern boundary of Monmouthshire.

3.8.2 SPA Qualifying Features[34]

This site qualifies under **Article 4.1** of the Directive (79/409/EEC) by supporting populations (counts are all at time of designation and could have changed since) of European importance of the following species listed on Annex I of the Directive:

Over winter

- Bewick's swan ***Cygnus columbianus bewickii***, 280 individuals representing at least 4.0% of the wintering population in Great Britain (5 year peak mean 1991/2 - 1995/6)

This site also qualifies under **Article 4.2** of the Directive (79/409/EEC) by supporting populations of European importance of the following migratory species:

On passage

- Ringed plover ***Charadrius hiaticula***, 655 individuals representing at least 1.3% of the Europe/Northern Africa - wintering population (5 year peak mean 1991/2 - 1995/6)

Over winter

- Curlew ***Numenius arquata***, 3,903 individuals representing at least 1.1% of the wintering Europe - breeding population (5 year peak mean 1991/2 - 1995/6)
- Dunlin ***Calidris alpina alpina***, 44,624 individuals representing at least 3.2% of the wintering Northern Siberia/Europe/Western Africa population (5 year peak mean 1991/2 - 1995/6)
- Pintail ***Anas acuta***, 599 individuals representing at least 1.0% of the wintering Northwestern Europe population (5 year peak mean 1991/2 - 1995/6)
- Redshank ***Tringa totanus***, 2,330 individuals representing at least 1.6% of the wintering Eastern Atlantic - wintering population (5 year peak mean 1991/2 - 1995/6)
- Shelduck ***Tadorna tadorna***, 3,330 individuals representing at least 1.1% of the wintering Northwestern Europe population (5 year peak mean 1991/2 - 1995/6)

Assemblage qualification: A wetland of international importance

[34] http://archive.jncc.gov.uk/default.aspx?page=2066

The area qualifies under **Article 4.2** of the Directive (79/409/EEC) by regularly supporting at least 20,000 waterfowl.

Over winter, the area regularly supports 93,986 individual waterfowl (5 year peak mean 1991/2 - 1995/6) including: Gadwall ***Anas strepera***, shelduck ***Tadorna tadorna***, pintail ***Anas acuta***, dunlin ***Calidris alpina alpina***, curlew ***Numenius arquata***, redshank ***Tringa totanus***, Bewick's swan ***Cygnus columbianus bewickii***, wigeon ***Anas penelope***, lapwing ***Vanellus vanellus***, teal ***Anas crecca***, mallard ***Anas platyrhynchos***, shoveler ***Anas clypeata***, pochard ***Aythya ferina***, tufted duck ***Aythya fuligula***, grey plover ***Pluvialis squatarola***, white-fronted goose ***Anser albifrons albifrons***, whimbrel ***Numenius phaeopus***.

3.8.3 Ramsar Qualifying Features[35]

The Ribble & Alt Estuaries is designated as a Ramsar site under the following criteria:

Criterion 1

- Due to the immense tidal range (second-largest in world), which affects both the physical environment and biological communities
    - Habitats Directive Annex I features present include sandbanks which are slightly covered by sea water all the time, estuaries, mudflats and sandflats not covered by sweater at low tide and Atlantic salt meadows (***Glauco-Puccinellietalia maritimae***)

Criterion 3

- Due to unusual estuarine communities, reduced diversity and high productivity

Criterion 4

- This site is important for the run of migratory fish between sea and river via estuary. Species include salmon Salmo salar, sea trout S. trutta, sea lamprey Petromyzon marinus, river lamprey Lampetra fluviatilis, allis shad Alosa alosa, twaite shad A. fallax, and eel Anguilla anguilla. It is also of particular importance for migratory birds during spring and autumn.

Criterion 5: Assemblages of international importance

Species with peak counts in winter

70,919 waterfowl (5 year peak mean 1998/99-2002/2003).

Criterion 6: Species / populations occurring at levels of international importance

Species with peak counts in winter

- Tundra swan ***Cygnus columbianus bewickii***; 229 individuals representing an average of 2.8% of the GB population (5 year peak mean 1998/99-2002/03)
- Greater white-fronted goose ***Anser albifrons***; 2,076 individuals representing an average of 35.8% of the GB population (5 year peak mean 1996/97-2000/01)
- Common shelduck ***Tadorna tadorna***; 3,223 individuals representing an average of 1% of the NW Europe population (5 year peak mean 1998/99-2002/03)
- Gadwall ***Anas strepera strepera***; 241 individuals representing an average of 1.4% of the GB population (5 year peak mean 1998/99-2002/03)
- Dunlin ***Calidris alpina alpina***; 25,082 individuals representing an average of 1.8% of the W Siberia and W Europe population (5 year peak mean 1998/99-2002/03)
- Common redshank ***tringa totanus tetanus***; 2,616 individuals representing an average of 1% of the population (5 year peak mean 1998/99-2002/03)

Species / populations identified subsequent to designation for possible future consideration under criterion 6

[35] https://jncc.gov.uk/jncc-assets/RIS/UK11081.pdf

Species regularly supported during the breeding season

- Lesser black-backed gull ***Larus fuscus graellsii***; 4,167 apparently occupied nests, representing an average of 2.8% of the breeding population (Seabird 2000 Census)

Species with peak counts in spring / autumn

- Ringed plover ***Charadrius hiaticula***; 740 individuals representing an average of 1% of the Europe and NW Africa population (5 year peak mean 1998/99-2002/03)

Species with peak counts in winter

- Eurasian teal ***Anas crecca***; 4,456 individuals representing an average of 1.1% of the NW Europe population (5 year peak mean 1998/99-2002/03)
- Northern pintail ***Anas acuta***; 756 individuals representing an average of 1.2% of the NW Europe population (5 year peak mean 1998/99-2002/03)

Criterion 8

The fish of the whole estuarine and river system is one of the most diverse in Britain, with over 110 species recorded. Salmon ***Salmo salar***, sea trout ***S. trutta***, sea lamprey ***Petromyzon marinus***, river lamprey ***Lampetra fluviatilis***, allis shad ***Alosa alosa***, twaite shad ***A. fallax***, and eel ***Anguilla anguilla*** use the Severn Estuary as a key migration route to their spawning grounds in the many tributaries that flow into the estuary. The site is important as a feeding and nursery ground for many fish species particularly allis shad ***Alosa alosa*** and twaite shad ***A. fallax*** which feed on mysid shrimps in the salt wedge.

3.8.4 Conservation Objectives[36]

With regard to the SPA and the individual species and/or assemblage of species for which the site has been classified (the 'Qualifying Features' listed below), and subject to natural change;

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;

- The extent and distribution of the habitats of the qualifying features
- The structure and function of the habitats of the qualifying features
- The supporting processes on which the habitats of the qualifying features rely
- The population of each of the qualifying features, and,
- The distribution of the qualifying features within the site.

3.8.5 Threats and Pressures to Site Integrity[37]

The following threats and pressures to the site integrity of the Severn Estuary SPA have been identified in Natural England's Site Improvement Plan:

- Public access / disturbance
- Physical modification
- Impacts of development
- Coastal squeeze
- Change in land management
- Changes in species distributions
- Water pollution
- Air pollution: Impact of atmospheric nitrogen deposition

[36] http://publications.naturalengland.org.uk/publication/5601088380076032
[37] http://publications.naturalengland.org.uk/publication/4590676519944192

- Marine consents and permits: Minerals and waste
- Fisheries: Recreational marine and estuarine
- Fisheries: Commercial marine and estuarine
- Invasive species
- Marine litter
- Marine pollution incidents

3.9 Severn Estuary SAC

3.9.1 Introduction

The Severn Estuary SAC was designated as a SAC in 2009, because it supports a significant number of habitats and species. It covers an area of 74,000ha and is designated partly for its estuary feature. Within this feature, subtidal sandbanks, intertidal mudflats and sandflats, Atlantic salt meadows and biogenic reefs are included. The SAC also harbours three migratory fish species, including river lamprey, sea lamprey and twaite shad. The Severn Estuary also comprises hard substrate habitats, an assemblage of 114 estuarine and marine fish species and various waterfowl species. The SAC forms the southern boundary of Monmouthshire.

3.9.2 Qualifying Features[38]

The site is classified as a SAC for various qualifying features.

Annex I habitats that are a primary reason for selection of this site:

- Estuaries
- Mudflats and sandflats not covered by seawater at low tide
- Atlantic salt meadows (***Glauco-Puccinellietalia maritimae***)

Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site

- Sandbanks which are slightly covered by sea water all the time
- Reefs

Annex II species that are a primary reason for selection of this site

- Sea lamprey Petromyzon marinus
- River lamprey Lampetra fluviatilis
- Twaite shad Alosa fallax

3.9.3 Conservation Objectives[39]

With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of qualifying natural habitats and habitats of qualifying species
- The structure and function (including typical species) of qualifying natural habitats
- The structure and function of the habitats of qualifying species

[38] https://sac.jncc.gov.uk/site/UK0013030
[39] http://publications.naturalengland.org.uk/publication/6081105098702848

- The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely
- The populations of qualifying species, and,
- The distribution of qualifying species within the site.

3.9.4 Threats and Pressures to Site Integrity[40]

The following threats and pressures to the site integrity of the Severn Estuary SAC have been identified in Natural England's Site Improvement Plan:

- Public access / disturbance
- Physical modification
- Impacts of development
- Coastal squeeze
- Change in land management
- Changes in species distributions
- Water pollution
- Air pollution: Impact of atmospheric nitrogen deposition
- Marine consents and permits: Minerals and waste
- Fisheries: Recreational marine and estuarine
- Fisheries: Commercial marine and estuarine
- Invasive species
- Marine litter
- Marine pollution incidents

3.10 Wye Valley and Forest of Dean Bat Sites SAC

3.10.1Introduction

The Wye Valley and Forest of Dean Bat Sites SAC lies within the Forest of Dean and Lower Wye National Character Area, straddling the England-Wales border. It includes 13 individual component sites (9 in England and 4 in Wales), which are all individually notified as SSSIs and that total an area of 144.82ha. The sites include both maternity roosts and hibernation sites in old buildings and mines / caves.

The wider surrounding landscape of the SAC is heavily wooded and edged by predominantly grazed farmland. This mixed landscape with trees and grazed pastures provides good conditions for both lesser horseshoe bat ***Rhinolophus hipposideros*** and greater horseshoe bat ***Rhinolophus ferrumequinum***. The designated SAC components harbour the highest density of lesser horseshoe bats in the UK, making up about 26% of the national population. The complex of sites harbours approx. 6% of the national greater horseshoe bat population.

The qualifying bat populations are supported by numerous summer roosts and hibernation sites in the area that are not designated, but form part of the wider ecological network of the SAC. Flightlines, commuting routes and feeding grounds are also critical in maintaining the integrity of the Wye Valley and Forest of Dean Bat Sites SAC. Additionally, there is some evidence of connectivity between the populations in the SAC, the Cotswolds to the east, the Malvern Hills to the north and areas in Wales to the west. The SAC lies in various places along the eastern boundary of Monmouthshire.

[40] http://publications.naturalengland.org.uk/publication/4590676519944192

3.10.2 Qualifying Features[41]

Annex II species that are a primary reason for selection of this site

- Lesser horseshoe bat ***Rhinolophus hipposideros***
- Greater horseshoe bat ***Rhinolophus ferrumequinum***

3.10.3 Conservation Objectives[42]

With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of the habitats of qualifying species
- The structure and function of the habitats of qualifying species
- The supporting processes on which the habitats of qualifying species rely
- The populations of qualifying species, and
- The distribution of qualifying species within the site.

3.10.4 Threats and Pressures to Site Integrity[43]

The following threats and pressures to the site integrity of the Wye Valley and Forest of Dean Bat Sites SAC have been identified in Natural England's Site Improvement Plan:

- Physical modification
- Public access / disturbance
- Habitat connectivity

3.11 Wye Valley Woodlands SAC

3.11.1 Introduction

The Wye Valley Woodlands SAC is a 913.32ha site that occupies the border between England and Wales. It comprises several habitats, most notably broad-leaved deciduous woodland (87%), and heath and scrub (10%). The SAC's components significantly contribute to a semi-natural woodland corridor connecting Chepstow and Monmouth. Much of the site is a gorge with a very steep topography, which dictates the available habitat types. In combination with woodlands in the Forest of Dean and Wentwood, this region is one of the most densely wooded areas in the UK. The SAC supports numerous wildlife species at the edge of their ecological range.

A total of 16 SSSI components make up the SAC, of which eight lie entirely in Wales and seven entirely in England. All SSSI components support the best examples of ***Tilio-Acerion*** forests, ***Asperulo-Fagetum*** beech forests and ***Taxus baccata*** woods of the British Isles. These woodlands also form important roosting and foraging habitat for the lesser horseshoe bat. A large proportion of the broadleaved woodland stands dates back to the Second World War and has developed a high forest structure due to the cessation of woodland management. The SAC lies in various places along the eastern boundary of Monmouthshire.

[41] https://sac.jncc.gov.uk/site/UK0014794
[42] http://publications.naturalengland.org.uk/publication/4907653293670400
[43] http://publications.naturalengland.org.uk/publication/6102625057505280

3.11.2 Qualifying Features[44]

Annex I habitats that are a primary reason for selection of this site:

- Asperulo-Fagetum beech forests
- Tilio-Acerion forests of slopes, screes and ravines
- Taxus baccata woods of the British Isles

Annex II species present as a qualifying feature, but not a primary reason for site selection:

- Lesser horseshoe bat Rhinolophus hipposideros

3.11.3 Conservation Objectives[45]

With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of qualifying natural habitats and habitats of qualifying species
- The structure and function (including typical species) of qualifying natural habitats
- The structure and function of the habitats of qualifying species
- The supporting processes on which qualifying natural habitats and habitats of qualifying species rely
- The populations of qualifying species, and,
- The distribution of qualifying species within the site.

3.11.4 Threats and Pressures to Site Integrity[46]

The following threats and pressures to the site integrity of the Wye Valley Woodlands SAC have been identified in Natural England's Site Improvement Plan:

- Deer
- Forestry and woodland management
- Invasive species
- Habitat connectivity
- Species decline
- Air pollution: Impact of atmospheric nitrogen deposition
- Disease
- Public access / disturbance

3.12 River Wye SAC

3.12.1 Introduction

The River Wye SAC is 25km in length and represents one of the longest near natural rivers in England and Wales, which drains a catchment of 4,136km^2. It is situated within the Forest of Dean and Lower Wye National Character Area, rising at 680m at Plynlimon in mountainous Wales before reaching the English border. The Wye flows through Hay-on-Wye, Hereford and Ross-on-Wye, then

[44] https://sac.jncc.gov.uk/site/UK0012727
[45] http://publications.naturalengland.org.uk/publication/6331090281168896
[46] http://publications.naturalengland.org.uk/publication/4735117343850496

past Monmouth and eventually meeting the Severn Estuary below Chepstow. The SAC shows a transition from bryophyte dominated upland areas to crowfoot dominated lower stretches. Notably, in contrast to many other river systems, the Wye has not been significantly straightened or modified by human activity. It is predominantly low-lying, meandering and only falling by 72m between Hay-on-Wye and the sea.

The SAC comprises a variety of substrate types ranging from silt to boulders, which form diverse habitats for a range of species. This substrate diversity has enabled a varied morphology with more active sections of river (with associated back channels and oxbow lakes) and gravel substrate, where pools and riffles are found. The SAC harbours a diverse submerged aquatic and riparian flora. Furthermore, the transitional zone in the lower reaches between freshwater and brackish water supports its own characteristic flora, particularly saltmarsh species. There is also a diverse invertebrate community with nationally rare river flies and dragonflies. All 6 species of unionid mussels are found here, which is unique in the UK.

A wide range of migratory and non-migratory fish is found in the Wye, including salmonids, such as Atlantic salmon, brown trout, sea trout and grayling, all of which are commercially exploited. All three species of lamprey are found as well as migratory eel. Also, allis shad and twaite shad enter the River Wye from the Severn Estuary to spawn further upstream. The riverine ecosystem is home to several other uncommon species, including otter, water vole and several bird species, such as dipper, grey wagtail and kingfisher. The SAC forms the eastern boundary of Monmouthshire.

3.12.2 Qualifying Features[47]

Annex I habitats that are a primary reason for selection of this site:

- Water courses of plain to montane levels with the ***Ranunculion fluitantis*** and ***Callitricho-Batrachion*** vegetation

Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site:

- Transition mires and quaking bogs

Annex II species that are a primary reason for selection of this site:

- White-clawed (or Atlantic stream) crayfish ***Austropotamobius pallipes***
- Sea lamprey ***Petromyzon marinus***
- Brook lamprey ***Lampetra planeri***
- River lamprey ***Lampetra fluviatilis***
- Twaite shad ***Alosa fallax***
- Atlantic salmon ***Salmo salar***
- Bullhead ***Cottus gobio***
- Otter ***Lutra lutra***

Annex II species present as a qualifying feature, but not a primary reason for site selection:

- Allis shad ***Alosa alosa***

3.12.3 Conservation Objectives[48]

With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

[47] https://sac.jncc.gov.uk/site/UK0012642
[48] http://publications.naturalengland.org.uk/publication/6096799802589184

- The extent and distribution of qualifying natural habitats and habitats of qualifying species
- The structure and function (including typical species) of qualifying natural habitats
- The structure and function of the habitats of qualifying species
- The supporting processes on which qualifying natural habitats and habitats of qualifying species rely
- The populations of qualifying species, and,
- The distribution of qualifying species within the site.

3.12.4 Threats and Pressures to Site Integrity[49]

The following threats and pressures to the site integrity of the River Wye SAC have been identified in Natural England's Site Improvement Plan:

- Water pollution
- Physical modification
- Invasive species
- Hydrological changes
- Forestry and woodland management
- Fisheries: Freshwater
- Fisheries: Fish stocking
- Water abstraction
- Public access / disturbance
- Air pollution: Impact of atmospheric nitrogen deposition
- Inappropriate scrub control
- Undergrazing
- Transportation and service corridors

3.13 Avon Gorge Woodlands SAC

3.13.1 Introduction

The Avon Gorge Woodlands SAC is a 151.07ha site that is a nationally important example of ***Tilio-Acerion*** forest in south-west England. The site includes ash ***Fraxinus excelsior***, wych elm ***Ulmus glabra*** and small-leaved lime ***Tilia cordata***. This habitat type is here found on calcareous substrates associated with the limestone cliffs and screes of a large river gorge with reduced human influence. It is a sub-community of W8 ***Fraxinus excelsior*** – ***Acer campestre*** – ***Mercurialis perennis*** woodland.

The site's ground flora typically includes Hart's-tongue ***Asplenium scolopendrium***, soft shield-fern ***Polystichum setiferum***, buckler-ferns ***Dryopteris*** spp., ramsons ***Allium ursinum***, dog's-mercury ***Mercurialis perennis*** and enchanter's nightshade ***Circaea lutetiana***. In some of the stonier locations, small groves of yew ***Taxus baccata*** occur. Part of the Leigh Woods is old wood pasture, managed for several hundreds of years, which contains large number of veteran pollards. The ***Tilio-Acerion*** woodland contains transitions to scrub, grassland and other woodland elements, including five whitebeam species. The Avon Gorge Woodlands SAC is important for both lesser and greater horseshoe bats ***Rhinolophus*** spp., breeding peregrine falcon ***Falco peregrinus*** and raven ***Corvus corax***. Rare invertebrates include the silky wave moth ***Idaea dilutaria***, Chalkhill blue ***Polyommatus coridon*** and small blue ***Cupido minimus***. Most of these species rely on SAC habitats and their future

[49] http://publications.naturalengland.org.uk/publication/5178575871279104

status therefore depends on the condition of the SAC. The SAC lies approximately 13km from Monmouthshire on the opposite side of the Severn Estuary in England.

3.13.2 Qualifying Features[50]

Annex I habitats that are a primary reason for selection of this site:

- ***Tilio-Acerion*** forests of slopes, screes and ravines

Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site:

- Semi-natural dry grasslands and scrubland facies on calcareous substrates (***Festuco-Brometalia***; important orchid sites)

3.13.3 Conservation Objectives[51]

With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of qualifying natural habitats
- The structure and function (including typical species) of qualifying natural habitats, and
- The supporting processes on which qualifying natural habitats rely

3.13.4 Threats and Pressures to Site Integrity[52]

The following threats and pressures to the site integrity of the Avon Gorge Woodlands SAC have been identified in Natural England's Site Improvement Plan:

- Invasive species
- Undergrazing
- Public access / disturbance
- Disease
- Changes in species distributions
- Air pollution: Impact of atmospheric nitrogen deposition

4. Test of Likely Significant Effects (LSE)

4.1 Introduction

This chapter provides background to the relevant impact pathways linked to the Replacement Local Development Plan (LP), highlights the European sites that are sensitive to these pathways, and identifies the policies that could (prior to the consideration of mitigation) result in Likely Significant Effects (LSE) on European sites. For a map of the European sites relevant to the Monmouthshire LP please see Appendix A. For the full LSE assessment of the strategic policies outlined within the LP please see Appendix B.

[50] https://sac.jncc.gov.uk/site/UK0012734
[51] http://publications.naturalengland.org.uk/publication/6740736611450880
[52] http://publications.naturalengland.org.uk/publication/5021516609617920

4.2 Impact Pathways Considered

The following impact pathways are considered relevant to the Monmouthshire LP:

- Atmospheric pollution (due to an increase in traffic generation);
- Recreational pressure (due to the local population growth);
- Loss of functionally linked land (due to the allocation of greenfield sites for development);
- Water quality (due to increases in sewage effluent and industrial pollutant input) and
- Water quantity, level and flow (due to an increased abstraction of water for dwellings and employment space).

4.3 Background to Atmospheric Pollution

Table 1: Main sources and effects of air pollutants on habitats and species[53]

Pollutant	Source	Effects on habitats and species
Sulphur Dioxide (SO_2)	The main sources of SO_2 are electricity generation, and industrial and domestic fuel combustion. However, total SO_2 emissions in the UK have decreased substantially since the 1980's. Another origin of sulphur dioxide is the shipping industry and high atmospheric concentrations of SO_2 have been documented in busy ports. In future years shipping is likely to become one of the most important contributors to SO_2 emissions in the UK.	Wet and dry deposition of SO_2 acidifies soils and freshwater, and may alter the composition of plant and animal communities. The magnitude of effects depends on levels of deposition, the buffering capacity of soils and the sensitivity of impacted species. However, SO_2 background levels have fallen considerably since the 1970's and are now not regarded a threat to plant communities. For example, decreases in Sulphur dioxide concentrations have been linked to returning lichen species and improved tree health in London.
Acid deposition	Leads to acidification of soils and freshwater via atmospheric deposition of SO_2, NOx, ammonia and hydrochloric acid. Acid deposition from rain has declined by 85% in the last 20 years, which most of this contributed by lower sulphate levels. Although future trends in S emissions and subsequent deposition to terrestrial and aquatic ecosystems will continue to decline, increased N emissions may cancel out any gains produced by reduced S levels.	Gaseous precursors (e.g. SO_2) can cause direct damage to sensitive vegetation, such as lichen, upon deposition. Can affect habitats and species through both wet (acid rain) and dry deposition. The effects of acidification include lowering of soil pH, leaf chlorosis, reduced decomposition rates, and compromised reproduction in birds / plants. Not all sites are equally susceptible to acidification. This varies depending on soil type, bed rock geology, weathering rate and buffering capacity. For example, sites with an underlying geology of granite, gneiss and quartz rich rocks tend to be more susceptible.
Ammonia (NH_3)	Ammonia is a reactive, soluble alkaline gas that is released following decomposition and volatilisation of animal wastes. It is a naturally occurring trace gas, but ammonia concentrations are directly related to the distribution of livestock. Ammonia reacts with acid pollutants such as the products of SO_2 and NO_X emissions to produce fine ammonium (NH_4+) - containing aerosol. Due to its significantly longer lifetime, NH_4+ may be transferred much longer distances (and can therefore be a significant trans-boundary issue). While ammonia deposition may be estimated from its atmospheric concentration, the deposition rates are strongly influenced by meteorology and ecosystem type.	The negative effect of NH_4+ may occur via direct toxicity, when uptake exceeds detoxification capacity and via N accumulation. Its main adverse effect is eutrophication, leading to species assemblages that are dominated by fast-growing and tall species. For example, a shift in dominance from heath species (lichens, mosses) to grasses is often seen. As emissions mostly occur at ground level in the rural environment and NH_3 is rapidly deposited, some of the most acute problems of NH_3 deposition are for small relict nature reserves located in intensive agricultural landscapes.
Nitrogen oxides (NO_x)	Nitrogen oxides are mostly produced in combustion processes. Half of NO_X emissions in	Direct toxicity effects of gaseous nitrates are likely to be important in areas close to the

[53] Information summarised from the Air Pollution Information System (http://www.apis.ac.uk/)

Pollutant	Source	Effects on habitats and species
	the UK derive from motor vehicles, one quarter from power stations and the rest from other industrial and domestic combustion processes. In contrast to the steep decline in Sulphur dioxide emissions, nitrogen oxides are falling slowly due to control strategies being offset by increasing numbers of vehicles.	source (e.g. roadside verges). A critical level of NOx for all vegetation types has been set to 30 ug/m3. Deposition of nitrogen compounds (nitrates (NO_3), nitrogen dioxide (NO_2) and nitric acid (HNO_3)) contributes to the total nitrogen deposition and may lead to both soil and freshwater acidification. In addition, NO_x contributes to the eutrophication of soils and water, altering the species composition of plant communities at the expense of sensitive species.
Nitrogen deposition	The pollutants that contribute to the total nitrogen deposition derive mainly from oxidized (e.g. NO_X) or reduced (e.g. NH_3) nitrogen emissions (described separately above). While oxidized nitrogen mainly originates from major conurbations or highways, reduced nitrogen mostly derives from farming practices. The N pollutants together are a large contributor to acidification (see above).	All plants require nitrogen compounds to grow, but too much overall N is regarded as the major driver of biodiversity change globally. Species-rich plant communities with high proportions of slow-growing perennial species and bryophytes are most at risk from N eutrophication. This is because many semi-natural plants cannot assimilate the surplus N as well as many graminoid (grass) species. N deposition can also increase the risk of damage from abiotic factors, e.g. drought and frost.
Ozone (O_3)	A secondary pollutant generated by photochemical reactions involving NOx, volatile organic compounds (VOCs) and sunlight. These precursors are mainly released by the combustion of fossil fuels (as discussed above). Increasing anthropogenic emissions of ozone precursors in the UK have led to an increased number of days when ozone levels rise above 40ppb ('episodes' or 'smog'). Reducing ozone pollution is believed to require action at international level to reduce levels of the precursors that form ozone.	Concentrations of O_3 above 40 ppb can be toxic to both humans and wildlife, and can affect buildings. High O_3 concentrations are widely documented to cause damage to vegetation, including visible leaf damage, reduction in floral biomass, reduction in crop yield (e.g. cereal grains, tomato, potato), reduction in the number of flowers, decrease in forest production and altered species composition in semi-natural plant communities.

The main pollutants of concern for European sites are oxides of nitrogen (NOx), ammonia (NH_3) and sulphur dioxide (SO_2) and are summarised in Table 1. Ammonia can have a directly toxic effect upon vegetation, particularly at close distances to the source such as near road verges[54]. NOx can also be toxic at very high concentrations (far above the annual average critical level). However, in particular, high levels of NOx and NH_3 are likely to increase the total N deposition to soils, potentially leading to deleterious knock-on effects in resident ecosystems. Increases in nitrogen deposition from the atmosphere is widely known to enhance soil fertility and to lead to eutrophication. This often has adverse effects on the community composition and quality of semi-natural, nitrogen-limited terrestrial and aquatic habitats[55] [56].

Sulphur dioxide emissions overwhelmingly derive from power stations and industrial processes that require the combustion of coal and oil, as well as (particularly on a local scale) shipping[57]. Ammonia emissions originate from agricultural practices[58], with some chemical processes also making notable contributions. As such, it is unlikely that material increases in SO_2 or NH_3 emissions will be associated with the LP. NOx emissions, however, are dominated by the output of vehicle exhausts (more than half of all emissions). A 'typical' housing development will contribute by far the largest portion to its overall NOx footprint (92%) through the associated road traffic. Other sources, although relevant, are

[54] http://www.apis.ac.uk/overview/pollutants/overview_NOx.htm.
[55] Wolseley, P. A.; James, P. W.; Theobald, M. R.; Sutton, M. A. **2006.** Detecting changes in epiphytic lichen communities at sites affected by atmospheric ammonia from agricultural sources. Lichenologist 38: 161-176
[56] Dijk, N. **2011.** Dry deposition of ammonia gas drives species change faster than wet deposition of ammonium ions: evidence from a long-term field manipulation Global Change Biology 17: 3589-3607
[57] http://www.apis.ac.uk/overview/pollutants/overview_SO2.htm.
[58] Pain, B.F.; Weerden, T.J.; Chambers, B.J.; Phillips, V.R.; Jarvis, S.C. 1998. A new inventory for ammonia emissions from U.K. agriculture. Atmospheric Environment 32: 309-313

of minor importance (8%) in comparison[59]. Emissions of NOx could therefore be reasonably expected to increase because of a higher number of vehicles due to implementation of the LP.

According to the World Health Organisation, the critical NOx concentration (critical threshold) for the protection of vegetation is 30 μgm^{-3}; the threshold for sulphur dioxide is 20 μgm^{-3}. In addition, ecological studies have determined 'critical loads'[60] of atmospheric nitrogen deposition (that is, NOx combined with ammonia NH_3).

The Department of Transport's Transport Analysis Guidance outlines that, beyond 200m, the contribution of vehicle emissions from the roadside to local pollution levels is not significant (Figure 3 and [61]). This is therefore the distance that has been used throughout this HRA in order to determine whether European sites are likely to be significantly affected by development outlined in the LP. Exhaust emissions from vehicles are capable of adversely affecting heathland habitats.

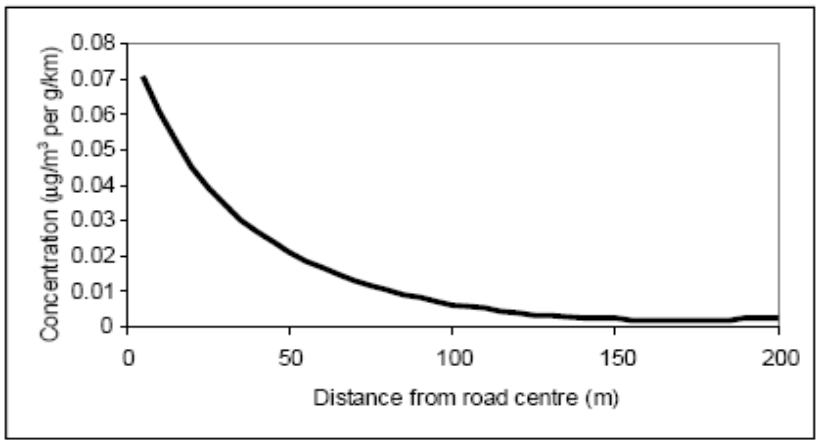

Figure 3: Traffic contribution to concentrations of pollutants at different distances from a road (Source: DfT[62])

Air quality assessments for Local Plans focus on traffic exhaust air quality impacts on SACs, SPAs and Ramsar sites. This is because the main source of impact is traffic growth from housing and employment allocations. Local Plans do not allocate land for agricultural development, nor do they allocate development that has industrial emissions permits required from Natural Resources Wales (i.e. development with stack emissions). While some sites are allocated in the Local Plan for waste, the allocations are not technology specific as that will be determined by the market. As such no air quality assessment of waste sites can be undertaken until planning applications come forward.

4.3.1 Screening for LSEs

The following European sites within 15km of Monmouthshire are susceptible to atmospheric pollution (the sites that are screened in for Appropriate Assessment following discussion in the text are marked in bold):

- **Usk Bat Sites SAC**
- **Cwm Clydach Woodlands SAC**
- **Wye Valley Woodlands SAC**
- **Severn Estuary SAC**
- **Severn Estuary SPA / Ramsar**

[59] Proportions calculated based upon data presented in Dore CJ et al. 2005. UK Emissions of Air Pollutants 1970 – 2003. UK National Atmospheric Emissions Inventory. http://www.airquality.co.uk/archive/index.php
[60] The critical load is the rate of deposition beyond which research indicates that adverse effects can reasonably be expected to occur
[61] http://www.dft.gov.uk/webtag/documents/expert/unit3.3.3.php#013 [Accessed on the 06/11/2019]
[62] http://www.dft.gov.uk/ha/standards/dmrb/vol11/section3/ha20707.pdf; accessed 13/07/2018

- **River Wye SAC**
- **Avon Gorge Woodlands SAC**
- River Usk SAC
- Wye Valley and Forest of Dean Bat Sites SAC
- Aberbargoed Grasslands SAC
- Sugar Loaf Woodlands SAC
- Llangorse Lake SAC
- Coed y Cerrig SAC

The Usk Bat Sites SAC is primarily designated for its populations of lesser horseshoe bats ***Rhinolophus hipposideros***. This species' main habitat is mixed broadleaved and yew woodland. According to APIS the habitat is sensitive to nitrogen deposition with a critical load set at 10 – 20 kg N/ ha/yr. There are also several Annex I habitats, such as degraded raised bogs and blanket bogs that are also highly sensitive to excessive nitrogen input, although these are much further from potentially relevant roads. For both types of bog habitats, the empirical critical load for annual nitrogen deposition has been set at 5 – 10 kg N/ha/yr. A preliminary assessment of the road infrastructure around the Usk Bat Sites SAC indicates that it lies directly adjacent to the A465, which is likely to be a main route for commuter traffic, particularly between Monmouthshire and Blaenau Gwent. Given the proximity of the SAC to such major traffic infrastructure, the site is screened in for Appropriate Assessment.

The Cwm Clydach Woodlands is designated for its beech ***Fagus*** woodland habitats, which are generally considered to be susceptible to atmospheric nitrogen deposition. APIS reports a site relevant critical load for beech forests of 10 – 20 kg N/h/yr. Exceedance impacts would potentially be changes in ground vegetation and mycorrhiza, nutrient shifts and concomitant changes in the soil fauna. The SAC is situated similarly to the Usk Bat Sites SAC, directly adjacent to the A465 and therefore requires further consideration in an Appropriate Assessment.

The Wye Valley Woodlands SAC comprises several qualifying woodland habitats. Its ***Asperulo-Fagetum*** woodland feature has a critical nitrogen load of 10-20 kg N/ha/yr. Its yew woodland feature is also sensitive to nitrogen deposition[63]. Exceedance of the critical load in the ***Taxus baccata*** woods feature would result in changes in soil processes, nutrient imbalance and an altered composition of plant and mycorrhiza communities. North of Chepstow, component parcels of the Wye Valley Woodlands SAC lie immediately adjacent to the A466. Given the sensitivity of the site's qualifying features and their proximity to the A466, this site is screened in for Appropriate Assessment.

The Severn Estuary SAC is designated for several habitats, including estuaries and Atlantic salt meadows, both of which are integral to the SPA's / Ramsar's bird assemblages and have a critical nitrogen load of 10-20 kg N/ha/yr, as identified on APIS. The critical load applies for most of the saltmarsh, but it is noted that the lower level of 10 kg N/ha/yr should be used for the more densely vegetated upper marsh and areas subjected to direct run-off from adjacent catchments. Exceedance impacts of the critical load would be an increase in late successional species, increased productivity and an increase in dominance of graminoid species. Several waterfowl species require a presence and suitable abundance of saltmarsh food plants for survival, such as saltmarsh grasses, herbs and their seeds, including ***Puccinella maritimae***, ***Salicornia*** and ***Agrostis***. The M4 motorway traverses the Severn Estuary SAC. As such, an increase in the number of car journeys associated with the Monmouthshire LP has the potential to result in LSEs on the Severn Estuary SAC through atmospheric pollution. The site is therefore screened in for Appropriate Assessment.

While the qualifying features of the Severn Estuary SPA / Ramsar are not directly susceptible to atmospheric nitrogen deposition, the prey species and habitats that these waterbirds rely on might be affected by significant changes in the concentrations of pollutants. Most of the birds feed on invertebrates in the littoral sediment and this habitat has a critical nitrogen load of 20 kg N/ha/yr. The littoral sediments also comprise the saltmarsh, which is one of the SAC's features that are sensitive to atmospheric pollution. It also needs to be considered that invertebrates, the birds' primary food

[63] APIS provides a coniferous woodland range of 5-15 kgN/ha/yr. However, this range is derived from research into northern pine and spruce forests and the lowest part of the load range (5 kgN/ha/yr) is driven by the lichen and bryophyte interest of those forests which are quite different from lichen poor yew woodland present at this SAC. A minimum critical load of 10kgN/ha/yr is considered most appropriate for this SAC.

source, are sensitive to acidification. However, acidification of the marine environment is primarily associated with shipping and air traffic, rather than car usage. In accordance with the Severn Estuary SAC, which is screened in for its sensitivity of many of the habitats that support the SPA / Ramsar bird assemblage, the Severn Estuary SPA / Ramsar is therefore screened in for Appropriate Assessment.

The River Wye SAC is a riverine system of plain to montane levels, which supports a range of fish, such as several lamprey species, migratory salmonids and otters. As for the River Usk SAC, the survival of these species is dependent on the integrity of the river. The freshwater habitat and associated riverine faunal interest features within the river are regarded as being primarily phosphate limited (not nitrogen limited). APIS therefore provides no nitrogen critical loads for these features. The SAC is also designated for its transition mires and quaking bogs and the River Wye SAC partially runs directly alongside several busy roads, including the A466 to the north of Chepstow and the A40 in Monmouth. However, there are no transition mires and quaking bogs within 200m of these roads as the only SAC unit which supports this feature is Colwyn Brook Marshes (North & South) SSSI, a relatively remote site in Powys. Therefore traffic-related air quality on the River Wye SAC can be screened out.

The River Usk SAC is a riverine system of plain to montane levels, which supports a range of fish, such as several lamprey species, migratory salmon and otters. The survival of these species is tightly linked to the maintenance of the integrity of the river. Freshwater habitats are typically regarded as being primarily phosphate limited, with lesser regard being given to nitrogen input. The River Usk Management Catchment Plan summarises a variety of measures implemented to preserve the integrity of the SAC[64] and explicitly refers to reducing the deposition of nitrogen deriving from atmospheric pollution. However, 'Delivering the Nutrient Management Plan' on the Wye-Usk Foundation website indicates the focus on nutrient control in these catchments remains phosphate, which does not come from the atmosphere. Moreover, there are no atmospheric nitrogen critical loads available to use in assessments for riverine European sites. As such, the River Usk SAC is screened out from Appropriate Assessment regarding atmospheric pollution.

The ***Tilio-Acerion*** forest of slopes, screes and ravines in the Avon Gorge Woodlands SAC is identified as being sensitive to atmospheric pollution in APIS with a critical nitrogen load of 15-20 kg N/ha/yr. An increase of the nitrogen concentration beyond this limit is likely to lead to changes in ground vegetation. While the SAC lies adjacent to the A4, which is a fairly busy road, there is no obvious connection to commuter routes arising from Monmouthshire. Bristol, the most likely work destination for Monmouthshire residents in proximity to the SAC, can be more easily reached via alternative routes. As such, the Avon Gorge Woodlands SAC is screened out from Appropriate Assessment.

The qualifying features of the Wye Valley and Forest of Dean Bat Sites SAC, namely the lesser and greater horseshoe bat, are not directly sensitive to atmospheric nitrogen deposition. The species' broad habitat is broadleaved, mixed and yew woodland, which has an empirical critical nitrogen load of 10-20 kg N/ha/yr. However, exceeding the critical load primarily would lead to relatively nuanced changes in the habitat, such as changes in soil processes, nutrient levels and ground vegetation. Any atmospheric pollution impact would not be expected to result in a material effect on the viability of the bat population, the abundance of their invertebrate prey species or the availability of potential roost sites. The bats predominantly rely on trees with sufficient cracks and fissures that have a high potential as roosting or hibernation sites, and it is unlikely that atmospheric pollution would affect this potential. While the woodland at the site is sensitive to nitrogen deposition, increases in nitrogen deposition are very unlikely to materially affect either the woodland structure or its foraging value, as the impact on woodlands generally amounts to changes in botanical species distribution of the groundflora and epiphytes.

According to APIS nitrogen deposition is not believed to have a direct, major effect on tree growth in the UK. Therefore, the availability of roost resources is unlikely to be materially affected by changes in nitrogen deposition. Lesser horseshoe bats have a relatively broad diet feeding on flies (mainly midges), small moths, caddis flies, lacewings, beetles, small wasps and spiders, while greater horseshoe bats mainly eat chafers, dung beetles, noctuid moths, craneflies and caddis flies. Woodland moth abundance is mainly dependent on larval foodplant availability. In the UK the large number of woodland moth species collectively use a wide variety of larval foodplants including common and widespread species such as nettles, docks, bramble and ivy as well as most tree

[64] Page 12 of the document at https://naturalresources.wales/media/3214/usk-management-catchment.pdf. [Accessed on the 09/08/2024]

species such as birch, hazel and oak. Some rarer moths use specific foodplants that are themselves uncommon, but for lesser horseshoe foraging value it is the overall abundance (rather than species richness) of flying invertebrates that is the most important factor. Nitrogen deposition on woodlands particularly affects epiphytes, groundflora species richness and percentage grass cover, but the larval foodplants of lesser horseshoe prey are common and widespread species that are either unaffected by nitrogen deposition or would probably respond positively to nitrogen deposition (e.g. common grasses, brambles and nettles). It is therefore concluded that the Monmouthshire LP will not result in LSEs on the Wye Valley and Forest of Dean Bat Sites SAC regarding the impact pathway atmospheric pollution. The site is screened out from Appropriate Assessment.

The Aberbargoed Grasslands SAC are designated for their ***Molinia*** meadows on calcareous, peaty or clayey-silt laden soils, which identified on APIS as being sensitive to atmospheric nitrogen deposition. Here, a critical load of 15 – 25 kg N/ha/yr for these meadows is listed. However, the Core Management Plan published by Natural Resources Wales does not identify atmospheric pollution as a key management measure for the SAC. The closest significant road within 200m of the SAC is the A4049. However, the SAC is remote from locations of housing or employment growth in Monmouthshire being over 16km from the nearest development site allocation (HA12, Land west of Trem yr Ysgol, Penperlleni). The site is screened out from Appropriate Assessment.

The Sugar Loaf Woodlands SAC is designated for its old sessile oak woods, which have an empirical critical load of 10 – 15 kg N/ha/yr as outlined on APIS. Exceedance of this threshold would result in a decrease in mycorrhiza, loss of epiphytic lichens and bryophytes, and more general changes to the ground vegetation. However, the site is located further than 200m away from the nearest major roads. For example, it lies approx. 885m from the A40 and 1.1km from the A465. As such this SAC can be screened out and will not require Appropriate Assessment.

APIS highlights that the Llangorse Lake SAC is vulnerable to atmospheric nitrogen deposition, although critical loads for comparable habitats have not previously been established. While it is well known that meso- and eutrophic systems are often phosphate limited, nitrogen may be a co-limiting factor. However, despite the site's general sensitivity to atmospheric pollution, there is no major road within 200m of the SAC. The closest road that would provide a significant commuting corridor is the A40, which is located 1.9km to the south-west of Llangorse Lake SAC. This is beyond the screening distance for atmospheric pollution and the SAC is therefore screened out from Appropriate Assessment.

The Coed y Cerrig SAC is designated for its alluvial forests with ***Alnus glutinosa*** and ***Fraxinus excelsior***, which are sensitive to some atmospheric pollutants. APIS highlights that the SAC is not sensitive to total atmospheric nitrogen deposition or nitrogen oxides. However, due to the presence of lichens and bryophytes, the site is sensitive to ammonia deposition at a critical level of 1 ug NH_3/m^3. While a significant portion of ammonia is likely to derive from agricultural sources, some of it could derive from traffic sources. However, the closest major road (the A465) lies approx. 2.8km to the east of the SAC and therefore lies well beyond the screening distance for atmospheric pollution. The Coed y Cerrig SAC is therefore screened out from Appropriate Assessment.

The following policies of the Replacement Local Development Plan have been screened in for Appropriate Assessment because they allocate residential or employment growth, likely leading to increased atmospheric pollution and therefore LSEs on several European sites, sensitive to atmospheric pollutants:

- Strategic Policy S1 – Growth Strategy
- Strategic Policy S2 – Spatial Distribution of Development – Settlement Hierarchy
- Policy H1 – Residential Development in Primary and Secondary Settlements
- Policy H2 – Residential Development in Main Rural Settlements
- Policy H3 – Residential Development in Minor Rural Settlements
- Policy HA1 - Land to the East of Abergavenny
- Policy HA2 – Land to the East of Caldicot
- Policy HA3 - Land at Mounton Road, Chepstow

- Policy HA4 – Land at Leasbrook, Monmouth
- Policy HA5 – Land at Penlanlas Farm, Abergavenny
- Policy HA6 – Land at Rockfield Road, Monmouth
- Policy HA7 – Land at Drewen Farm, Monmouth
- Policy HA8 – Land at Tudor Road, Wyesham, Monmouth
- Policy HA9 – Land at former MOD Land, Caerwent
- Policy HA10 – Land South of Monmouth Road, Raglan
- Policy HA11 – Land-east of Burrium Gate, Usk
- Policy HA12 – Land west of Trem yr Ysgol, Penperlleni
- Policy HA13 – Land adjacent to Piercefield Public House, St Arvans
- Policy HA14 – Land at Churchfields, Devauden
- Policy HA15 – Land east of Little Mill
- Policy HA16 – Land North of Little Mill
- Policy HA17 – Land adjacent to Llanellen Court Farm, Llanellen
- Policy HA18 – Land West of Redd Landes, Shirenewton
- Strategic Policy S9 – Gypsy and Travellers
- Strategic Policy S10 – Employment Sites Provision
- Policy EA1 – Employment Allocations
- Policy EA2 – Protected Employment Sites
- Strategic Policy S12 – Visitor Economy
- Policy W3 – Identified Waste Management Sites

There are two minerals policies (Policy M2 – Minerals Safeguarding Areas and Policy M3 – Mineral Site Buffer Zones) but these do not allocate or promote minerals development. Rather they are safeguarding policies that prevent incompatible development from sterilising mineral resources. Proposals to exploit those resources would be assessed when applications were submitted and the safeguarding policies does not presume consent will be granted.

4.4 Background to Recreational Pressure

There is growing concern about the cumulative impacts of recreation on key nature conservation sites in the UK, as most sites must fulfill conservation objectives while also providing recreational opportunity. HRAs of Local Plans tend to focus on recreational pressure arising from a net increase in residents[65]. Generally, recreational use of a European site has the potential to:

- Cause disturbance to wildlife species, particularly overwintering waterfowl and wader species
- Cause damage through direct trampling damage, erosion and habitat fragmentation;
- Cause eutrophication through recreation, such as through dog fouling; and
- Prevent appropriate management or exacerbate existing management difficulties;

[65] The RTPI report 'Planning for an Ageing Population'(2004) which states that 'From being a marginalised group in society, the elderly are now a force to be reckoned with and increasingly seen as a market to be wooed by the leisure and tourist industries. There are more of them and generally they have more time and more money.' It also states that 'Participation in most physical activities shows a significant decline after the age of 50. The exceptions to this are walking, golf, bowls and sailing, where participation rates hold up well into the 70s'.

The sensitivity of European sites to different types of recreational pressure varies. Studies across a range of species have shown that the effects from recreation can be complex. It also should be emphasised that recreational use is not necessarily damaging. For example, in heathlands a certain level of physical disturbance (that is not continuous in nature) is considered beneficial, as this contributes to the maintenance of the overall habitat diversity and the maintenance of bare ground, the habitat feature that may harbour some of the rarest heathland species[66]. However, in practice, a benign level of disturbance is not quantifiable and is likely to be confined to within narrow limits. Once the optimum recreational pressure is exceeded, negative impacts of recreation are to be expected.

Some of the most prominent examples of recreational pressure relevant to the European sites within or close to Monmouthshire, namely disturbance to sensitive species of birds, trampling damage, erosion and nutrient enrichment, are discussed below.

4.4.1 Disturbance of overwintering waterfowl and waders (September – March)

Human activity can affect birds either directly (e.g. by causing them to flee) or indirectly (e.g. by damaging their habitat or reducing their fitness in less obvious ways e.g. stress). The most obvious direct effect is that of immediate mortality such as death by shooting, but human activity can also lead to much more subtle behavioural (e.g. alterations in feeding behaviour, avoidance of certain areas and use of sub optimal areas etc.) and physiological changes (e.g. an increase in heart rate). While these are less noticeable, they might result in major population-level changes by altering the balance between immigration/birth and emigration/death[67].

Concern regarding the effects of disturbance on birds stems from the fact that they are expending energy unnecessarily and the time they spend responding to disturbance is time that is not spent feeding[68]. Disturbance therefore risks increasing energetic expenditure of birds while reducing their energetic intake, which can adversely affect the 'condition' and ultimately survival of the birds. Additionally, displacement of birds from one feeding site to others can increase the pressure on the resources available within the remaining sites, as they then must sustain a greater number of birds[69]. Moreover, the more time a breeding bird spends disturbed from its nest, the more its eggs are likely to cool and the more vulnerable they, or any nestlings, are to predators. Multiple research reports have provided compelling links between changes in housing and access levels and impacts on different bird species in European protected sites[70] [71].

Evidence in the literature suggests that the magnitude of disturbance clearly differs between different types of recreational activities. For example, dog walking leads to a significantly higher reduction in bird diversity and abundance than hiking[72]. Scientific evidence also suggests that key disturbance parameters, such as areas of influence and flush distance, are significantly greater for dog walkers than hikers[73]. A UK meta-analysis suggests that important spatial (e.g. the area of a site potentially influenced) and temporal (e.g. how often or long an activity is carried out) parameters differ between recreational activities, suggesting that activity type is a factor that should be taken into account by HRAs[74].

There is also likely to be a temporal element to disturbance, creating different disturbance patterns in summer and winter. It can be generally assumed that there are fewer recreational users in winter and that disturbance at a population level may be reduced, because birds are not breeding. However, recreational disturbance in winter may still have negative impacts, because birds face seasonal food

[66] Key R. 2000. Bare ground and the conservation of invertebrates. British Wildlife 11: 183-192.
[67] Riley, J. 2003. Review of Recreational Disturbance Research on Selected Wildlife in Scotland. Scottish Natural Heritage.
[68] Riddington, R. ***et al***. 1996. The impact of disturbance on the behaviour and energy budgets of Brent geese. ***Bird Study*** 43:269-279
[69] Gill, J.A., Sutherland, W.J. & Norris, K. 1998. The consequences of human disturbance for estuarine birds. ***RSPB Conservation Review*** 12: 67-72
[70] Liley D, Clarke R.T., Mallord J.W., Bullock J.M. 2006a. The effect of urban development and human disturbance on the distribution and abundance of nightjars on the Thames Basin and Dorset Heaths. Natural England / Footprint Ecology.
[71] Liley D., Clarke R.T., Underhill-Day J., Tyldesley D.T. 2006b. Evidence to support the appropriate Assessment of development plans and projects in south-east Dorset. Footprint Ecology / Dorset County Council.
[72] Banks P.B., Bryant J.Y. 2007. Four-legged friend or foe? Dog walking displaces native birds from natural areas. Biology Letters 3: 14pp.
[73] Miller S.G., Knight R.L., Miller C.K. 2001. Wildlife responses to pedestrians and dogs. 29: 124-132.
[74] Weitowitz D., Panter C., Hoskin R., Liley D. The spatio-temporal footprint of key recreation activities in European protected sites. Manuscript in preparation.

shortages and are likely to be susceptible to any nutritional loss. Therefore, the abandonment of suitable feeding areas due to disturbance can have serious consequences for their ability to find suitable alternative feeding sites.

Scientific evidence of disturbance to waterfowl and waders is now widely available. For example, Tuite et al[75] used a large (379 sites), long-term (10-year) dataset (September – March species counts) to correlate seasonal changes in wildfowl abundance with the presence of various recreational activities. They determined that the shoveler was one of the most sensitive species to recreational activities, such as sailing/windsurfing and rowing. Studies on recreation in the Solent have established that human leisure activities cause direct disturbance to wintering waterfowl populations[76] [77].

A recent study on recreational disturbance on the Humber[78] assesses different types of noise disturbance on waterfowl referring to studies relating to aircraft (see Drewitt 1999[79]), traffic (Reijnen, Foppen, & Veenbaas 1997)[80], dogs (Lord, Waas, & Innes 1997[81]; Banks & Bryant 2007[82]) and machinery (Delaney et al. 1999; Tempel & Gutierrez 2003). These studies identified that there is still relatively little work on the effects of different types of water-based craft and the impacts from jet skis, kite surfers, windsurfers etc. (see Kirby et al. 2004[83] for a review). Some types of disturbance are clearly likely to invoke different responses. In very general terms, both distance from the source of disturbance and the scale of the disturbance (noise level, group size) will both influence the response (Delaney et al. 1999[84]; Beale & Monaghan 2005[85]). On UK estuaries and coastal sites, a review of WeBS data showed that, among the volunteer WeBS surveyors, driving of motor vehicles and shooting were the two activities most perceived to cause disturbance (Robinson & Pollitt 2002)[86].

A study in the Solent monitored bird disturbance across 20 different locations between December 2009 and February 2010[87]. This involved recording all recreational activities and relating these to behavioural responses of birds in pre-defined focal areas of intertidal habitat. The study recorded a total of 2,507 potential disturbance events, generating 4,064 species-specific behaviours. Roughly 20% of recorded events resulted in disturbance of waterfowl, including behaviours such as becoming alert, walking / swimming away, short flights (< 50m) or major flights. Generally, the likelihood of disturbance decreased with increasing distance to the disturbance stimulus (i.e. the recreational activity being undertaken). Importantly, the study also illustrated that recreational activities in the intertidal zone have the highest disturbance potential (41% of recorded events resulted in disturbance), followed by water-based activities (25%) and shore-based activities (12%).

The specific distance at which a species takes flight when disturbed is known as the ‘tolerance distance’ (also called the ‘escape distance’) and greatly differs between species. The tolerance distances of the study carried out for the Bird Aware project are summarised in Table 2. It is reasonable to assume from this evidence that disturbance is unlikely to be relevant at distances of beyond 200m. The data show that the sensitivity to disturbance differs between species, but that the intra-specific variation in response to disturbance is equally important. It was also examined how disturbance to different recreational activities varies between species, but for most species the number of recorded events was not enough for comparison (except for brent goose, oystercatcher

[75] Tuite, C.H., Hanson, P.R. & Owen, M. 1984. Some ecological factors affecting winter wildfowl distribution on inland waters in England and Wales and the influence of water-based recreation. ***Journal of Applied Ecology*** 21: 41-62
[76] Footprint Ecology. 2010. Recreational Disturbance to Birds on the Humber Estuary
[77] Footprint Ecology, Jonathan Cox Associates & Bournemouth University. 2010. Solent disturbance and mitigation project – various reports.
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[80] Reijnen, R., Foppen, R. & Veenbaas, G. (1997) Disturbance by traffic of breeding birds: evaluation of the effect and considerations in planning and managing road corridors. Biodiversity and Conservation, 6, 567-581.
[81] Lord, A., Waas, J.R. & Innes, J. (1997) Effects of human activity on the behaviour of northern New Zealand dotterel Charadrius obscurus aquilonius chicks. Biological Conservation, 82,15-20.
[82] Banks, P.B. & Bryant, J.V. (2007) Four-legged friend of foe? Dog-walking displaces native birds from natural areas. Biology Letters, 3, 611-613.
[83] Kirby, J.S., Clee, C. & Seager, V. (1993) Impact and extent of recreational disturbance to wader roosts on the Dee estuary: some preliminary results. Wader Study Group Bulletin, 68, 53-58.
[84] Delaney, D.K., Grubb, T.G., Beier, P., Pater, L.L.M. & Reiser, H. (1999) Effects of Helicopter Noise on Mexican Spotted Owls. The Journal of Wildlife Management, 63, 60-76.
[85] Beale, C.M. & Monaghan, P. (2005) Modeling the Effects of Limiting the Number of Visitors on Failure Rates of Seabird Nests. Conservation Biology, 19, 2015-2019.
[86] Robinson, J.A. & Pollitt, M.S. (2002) Sources and extent of human disturbance to waterbirds in the UK: an analysis of Wetland Bird Survey data, 1995/96 to 1998/99: Less than 32% of counters record disturbance at their site, with differences in causes between coastal and inland sites. Bird Study, 49, 205.
[87] Liley D., Stillman R. & Fearnley H. 2011. The Solent Disturbance and Mitigation Project Phase 2: Results of Bird Disturbance Fieldwork 2009/10. Report by Footprint Ecology for the Solent Forum.

and redshank). The results suggest that species might respond to recreational activities differently. For example, brent geese responded to dog walkers much further away than oystercatcher and redshank. It is noted that while these data have been collected in relation to the Solent, similar tolerance distances might apply to species in the Severn Estuary SPA / Ramsar.

Table 2: Tolerance distances in metres of 16 species of waterfowl to various forms of recreational disturbance, as found in recent disturbance fieldwork[88]. The distances are provided both as a median and a range.

Species	Disturbance Distance (metres from stimulus)		Activity			
	Median	Range	Cycling	Dog walking	Jogging	Walking
Brent goose	51.5	5 - 178	100	95	30	50
Oystercatcher	46	10 - 200	150	45		50
Redshank	44.5	75 - 150	125	50	40	58
Curlew	75	25 - 200				
Turnstone	50	5 - 100				
Coot	12	10 - 20				
Mute swan	12	8 - 50				
Grey plover	75	30 - 125				
Little egret	75	30 - 200				
Wigeon	75.5	20 - 125				
Dunlin	75	25 - 300				
Shelduck	77.5	50 - 140				
Great-crested grebe	100	50 - 100				
Lapwing	75	18 - 125				
Teal	60	35 - 200				
Mallard	25	10 - 50				

4.4.2 Trampling damage, erosion and nutrient enrichment

Most terrestrial habitats, especially grassland, heathland and woodland, can be affected by trampling and other mechanical damage, which in turn causes soil compaction and erosion. Some of the following studies have investigated the negative impacts of trampling, associated with different recreational activities:

- Wilson & Seney)[89] examined the degree of track erosion caused by hikers, motorcycles, horses and cyclists from 108 plots along tracks in the Gallatin National Forest, Montana. Although the results proved difficult to interpret, it was concluded that horses and hikers disturbed more sediment on wet tracks, and therefore caused more erosion, than motorcycles and bicycles.
- Cole et al[90] conducted experimental off-track trampling in 18 closed forest, dwarf scrub and meadow & grassland communities (each tramped between 0 – 500 times) over five mountain regions in the US. Vegetation cover was assessed two weeks and one year after trampling, and an inverse relationship with trampling intensity was discovered, although this relationship was weaker after one year than two weeks indicating some recovery of the vegetation. Differences in plant morphological characteristics were found to explain more variation in response between different vegetation types than soil and topographic factors. Low-growing, mat-forming grasses regained their cover best after two weeks and were considered most resistant to trampling, while

[88] Ibid.
[89] Wilson, J.P. & J.P. Seney. 1994. Erosional impact of hikers, horses, motorcycles and off road bicycles on mountain trails in Montana. Mountain Research and Development 14:77-88
[90] Cole, D.N. 1995a. Experimental trampling of vegetation. I. Relationship between trampling intensity and vegetation response. Journal of Applied Ecology 32: 203-214
Cole, D.N. 1995b. Experimental trampling of vegetation. II. Predictors of resistance and resilience. Journal of Applied Ecology 32: 215-224

tall forbs (non-woody vascular plants other than grasses, sedges, rushes and ferns) were considered least resistant. The cover of hemicryptophytes and geophytes (plants with buds below the soil surface) was heavily reduced after two weeks, but had recovered well after one year and as such these were considered most resilient to trampling. Chamaephytes (plants with buds above the soil surface) were least resilient to trampling. It was concluded that these would be the least tolerant of a regular cycle of disturbance.

- Cole [91] conducted a follow-up study (in 4 vegetation types) in which shoe type (trainers or walking boots) and trampler weight were varied. Although immediate damage was greater with walking boots, there was no significant difference after one year. Heavier tramplers caused a greater reduction in vegetation height than lighter tramplers, but there was no difference in the effect on cover.
- Cole & Spildie[92] experimentally compared the effects of off-track trampling by hiker and horse (at two intensities – 25 and 150 passes) in two woodland vegetation types (one with an erect forb understorey and one with a low shrub understorey). Horse trampling was found to cause the largest reduction in vegetation cover. The forb-dominated vegetation suffered greatest disturbance but recovered rapidly. Generally, it was shown that higher trampling intensities caused more disturbance.
- In heathland sites, trampling damage can also affect the value of a site to wildlife. For example, heavy use of sandy tracks loosens and continuously disturbs sand particles, reducing the habitat's suitability for invertebrates[93]. Species that burrow into flat surfaces such as the centres of paths, are likely to be particularly vulnerable, as the loose sediment can no longer maintain their burrow. In some instances, nature conservation bodies and local authorities resort to hardening paths to prevent further erosion. However, this is concomitant with the loss of habitat used by wildlife, such as sand lizards and burrowing invertebrates.

Some of the European sites relevant to the Monmouthshire LP are likely to be affected by more specialized recreational activities, which are carried out less frequently than more popular activities (e.g. walking, dog walking, exercising). These niche activities might include canoeing, fishing and caving. However, due to their disproportionate impact these activities nevertheless require consideration. For example, canoeists might affect wildlife and their habitats throughout long stretches of rivers, including disturbance to gravel bars, the macrophyte community and species that live along the rivers, such as otter. Recreational fishing, not a mainstream recreational activity, is known to have contributed to the global fish stock crisis. It is estimated that recreational fishing around the world contributes approx. 12% to the global annual fish harvest[94]. Furthermore, a global meta-analysis showed that fishing, both recreational and commercial, affects not only the population abundance of the target species but also leads to knock-on effects in the wider food web.[95]

A major concern for nutrient-poor terrestrial habitats (e.g. heathlands, bogs and fens) is nutrient enrichment associated through dog fouling, which has been addressed in various reviews (e.g.[96]). It is estimated that dogs will defecate within 10 minutes of starting a walk and therefore most nutrient enrichment arising from dog faeces will occur within 400m of a site entrance. In contrast, dogs will urinate at frequent intervals during a walk, resulting in a more spread out distribution of urine. For example, in Burnham Beeches National Nature Reserve it is estimated that 30,000 litres of urine and 60 tonnes of dog faeces are deposited annually[97]. While there is little information on the chemical constituents of dog faeces, nitrogen is one of the main components[98]. Nutrient levels are the major determinant of plant community composition and the effect of dog defecation in sensitive habitats (e.g.

[91] Cole, D.N. 1995c. Recreational trampling experiments: effects of trampler weight and shoe type. Research Note INT-RN-425. U.S. Forest Service, Intermountain Research Station, Utah.
[92] Cole, D.N., Spildie, D.R. 1998. Hiker, horse and llama trampling effects on native vegetation in Montana, USA. Journal of Environmental Management 53: 61-71
[93] Taylor K., Anderson P., Liley D. & Underhill-Day J.C. 2006. Promoting positive access management to sites of nature conservation value: A guide to good practice. English Nature / Countryside Agency, Peterborough and Cheltenham.
[94] Cooke S.J. & Cowx I.G. 2004. The role of recreational fishing in global fish crises. BioScience 54: 857-859.
[95] Blaber S.J.M., Cyrus D.P., Albaret J.-J., Ching C.V., Day J.W., Elliott M., Fonseca M.S., Hoss D.E., Orensanz J., Potter I.C., Silvert W. 2000. Effects of fishing on the structure and functioning of estuarine and nearshore ecosystems. ICES Journal of Marine Science 57: 590-602.
[96] Taylor K., Anderson P., Taylor R.P., Longden K. & Fisher P. 2005. Dogs, access and nature conservation. English Nature Research Report, Peterborough.
[97] Barnard A. 2003. Getting the facts – Dog walking and visitor number surveys at Burnham Beeches and their implications for the management process. Countryside Recreation 11:16-19.
[98] Taylor K., Anderson P., Liley D. & Underhill-Day J.C. 2006. Promoting positive access management to sites of nature conservation value: A guide to good practice. English Nature / Countryside Agency, Peterborough and Cheltenham.

heathland) is comparable to a high-level application of fertiliser, potentially resulting in the shift to plant communities that are more typical for improved grasslands.

4.4.3 Screening for LSEs

The following European sites within 15km of Monmouthshire are susceptible to recreational pressure (the sites that are screened in for Appropriate Assessment following discussion in the text are marked in **bold**):

- Severn Estuary SPA / Ramsar
- Severn Estuary SAC
- Usk Bat Sites SAC
- River Wye SAC
- River Usk SAC
- Avon Gorge Woodlands SAC
- Wye Valley and Forest of Dean Bat Sites SAC
- Wye Valley Woodlands SAC
- Sugar Loaf Woodlands SAC
- Cwm Clydach Woodlands SAC
- Aberbargoed Grasslands SAC
- Coed y Cerrig SAC

The qualifying waterfowl and wader assemblage in the Severn Estuary SPA / Ramsar is highly sensitive to recreational disturbance through activities on land (e.g. dog walking), in the intertidal zone and on the water (e.g. different forms of watersports). Disturbance of birds in feeding and roosting areas is likely to result in the displacement of birds and, potentially, in the decline of the SPA's / Ramsar's qualifying population. As highlighted in the site's Core Management Plan, human disturbance might result in reduced food intake and / or increased energy expenditure by the birds, with the potential for reducing the long-term viability of the population. LSEs of the Monmouthshire LP on the Severn Estuary SPA / Ramsar therefore cannot be excluded and the site is screened in for Appropriate Assessment.

The Severn Estuary SAC is designated for several habitats, which provide the basal support for qualifying species of the SPA / Ramsar. As such, the impact pathways of these European sites should not be viewed in isolation. Several habitats are especially sensitive to trampling damage and abrasion associated with recreational activities, such as the Atlantic salt meadows. Saltmarsh is highly vulnerable to terrestrial and water-based activities, such as through increased erosion rates associated with tyres of off-road vehicles and the wash resulting from boating / shipping. Similarly, sandflat and mudflat habitat is highly susceptible to both land- and water-based activities, such as boating, anchoring, bait digging and trampling. Overall, the Monmouthshire LP may result in LSEs on the Severn Estuary SAC regarding recreational pressure and the site is therefore screened in for Appropriate Assessment.

The lesser horseshoe bat population in the Usk Bat Sites SAC are likely to be highly susceptible to recreational disturbance. As identified in the Core Management Plan for the site, internal disturbance to the maternity roost and the hibernation sites is likely to be a major stressor for the bats. However, the habitat features that the bats are associated with are classified as 'Caves not open to the public'. This means that human disturbance to bats is kept to a minimum by restricting public access to their roost sites. However, while some caves (e.g. Agen Allwedd) are gated to prevent public access, this is not the case for all caves.

The Usk Bat Sites SAC also supports other habitats that are sensitive to recreational impacts, including its calcareous slopes with chasmophytic vegetation and its dry heathland elements. For example, rock climbing is an identified recreational activity causing disturbance to the plants and substrate of slopes. Heavy trampling damage might lead to erosion and bare ground, damaging the heathland habitats. While both caving and climbing are relatively rare recreational activities (in comparison to e.g. dog walking), the impact of individuals engaging in these activities might be disproportionately high. As a precautionary measure, the Usk Bat Sites SAC is therefore screened in for Appropriate Assessment.

The River Usk SAC is primarily designated for its anadromous fish species, including Atlantic salmon ***Salmo salar***, twaite shad ***Alosa fallax*** and allis shad ***Alosa alosa***. Generally, it is the adults travelling up the river to the spawning grounds, which are susceptible to the impacts of fishing. The Core Management Plan for the SAC identifies that both recreational and commercial fishing are threatening shad populations. These species are fished in large numbers and recreational fishing has been identified as one of the main reasons for their population declines. Relating to Atlantic salmon a seasonal catch restriction is already imposed by Natural Resources Wales, which require that all salmon caught before the 16th of June is released back to the water to protect fish stocks[99]. However, given that exploitation of shad is currently unregulated, the River Usk SAC is screened in for Appropriate Assessment.

The River Wye SAC is designated for its water course of plain to montane reaches, its salmonid species, white-clawed crayfish and otter. Principally, all its fish species are potentially sensitive to fisheries exploitation. Natural England's Site Conservation Objectives Supplementary Advice Note highlights that any rod fishing should be undertaken sustainably without adversely affecting the ability of fish species for natural regeneration[100]. Like the River Usk SAC, shad in the River Wye SAC are potentially fished in great numbers with uncertain effects on the SAC's population. Exploitation of shad is currently unregulated, but management controls are being considered by the review of freshwater fisheries legislation to identify sustainable levels of angling. Furthermore, Natural England's Site Improvement Plan for the English parts of the SAC also highlights recreational disturbance as a threat to the site, particularly the disturbance of otters by dog walkers and the disturbance of gravel bars and beds, which form important spawning grounds for the SAC's fish species, by canoeists[101]. Given the current evidence relating to recreational pressure in the SAC, LSEs cannot be excluded, and the site is screened in for Appropriate Assessment.

The Avon Gorge Woodlands SAC, designated for its ***Tilio-Acerion*** forests of slopes, screes and ravines, and semi-natural dry grasslands, is highly sensitive to recreational impacts, particularly from illegal mountain biking access to the steep sides of the gorge. Natural England's Site Improvement Plan highlights that the site suffers major pressures from public access and that there is a need for close monitoring and visitor engagement to ensure that current visitation rates are sustainable[102]. However, the SAC lies at a distance of approx. 9.5km from the boundary of Monmouthshire, and several kilometres further from the nearest settlement within Monmouthshire. Core Visitor Catchments (CVC's) are based on the distances that people are willing to travel to visit recreational destinations. This approach originates from the Thames Basin Heath Delivery Framework, which identified a precautionary CVC of 7km around the Thames Basin Heaths SPA. While no such visitor data is specifically available for the Avon Gorge Woodlands SAC, Monmouthshire is located beyond a precautionary 7km core visitor catchment from the SAC. In addition, the River Severn will act as a barrier and, in practice, it is unlikely that many Monmouthshire residents will use the M4 to cross the river to drive up the Avon Gorge. Therefore, it is concluded that there will be no LSEs of the Monmouthshire LP on the SAC and the site is screened out from Appropriate Assessment.

The lesser and greater horseshoe bat populations in the Wye Valley and Forest of Dean Bat Sites SAC are very vulnerable to recreational disturbance, especially during hibernation when human presence might cause the bats to wake up and burn valuable fat reserves. Natural England's Supplementary Conservation Objectives Advice Note highlights that hibernation sites, where possible, should be secured against unauthorised access using grilles. The upkeep and repair of grilles is being delivered by Natural England and Natural Resources Wales. Caving in the wider area of the SAC falls under the remit of the Royal Forest of Dean Caving Club (RFDCG), which provides background on the geology and ecology of selected caves. A permit system is operated for cavers by the Forest of Dean Cave Conservation and Access Group. Furthermore, detailed access guidelines for both caves and mines in the Forest of Dean area have been released by members of the access group. In contrast to the Usk Bat Sites SAC, which is located in the Bannau Brycheiniog National Park, the Wye Valley and Forest of Dean Bat Sites SAC is not considered to have a similarly strong recreational draw and it is therefore unlikely that the relatively small individual component sites of the SAC receive a high number of recreational visits. Given this and that access is tightly regulated by grilles and the RFDCG, it is

[99] https://naturalresources.wales/days-out/things-to-do/fishing/?lang=en [Accessed on the 09/08/2024]
[100] http://publications.naturalengland.org.uk/publication/6096799802589184 [Accessed on the 09/08/2024]
[101] p17 of the Site Improvement Plan; http://publications.naturalengland.org.uk/publication/5178575871279104 [Accessed on the 09/08/2024]
[102] http://publications.naturalengland.org.uk/publication/5021516609617920 [Accessed on the 09/08/2024]

concluded that there will be no LSEs of the Monmouthshire LP on the SAC regarding recreational pressure. The site is therefore screened out from Appropriate Assessment.

The Wye Valley Woodlands SAC is designated for several woodland habitats, including ***Asperulo-Fagetum*** beech forest, ***Tilio-Acerion*** forest of slopes, screes and ravines and ***Taxus baccata*** woods. The SAC is heavily used for walking, mountain biking and rock climbing. Areas of ancient forest within the SAC are likely to be more sensitive to negative recreational impacts including from trampling abrasion, soil compaction around root zones (results in less space available for water and air) and potential changes to ground flora due to nutrient enrichment (primarily from dog walkers). Natural Resources Wales have highlighted damage from recreational activities (particularly off-track mountain biking and climbing) to SAC features. Furthermore, the number of visitors engaging in climbing activities is increasing. Therefore, LSEs of the Monmouthshire RLDP on the Wye Valley Woodlands SAC regarding recreational pressure cannot be excluded and the site is screened in for Appropriate Assessment as a precautionary measure. It is noted that lesser horseshoe bats, Annex II qualifying species of the SAC, are highly sensitive to recreation, but access to the component sites of the SAC that act as maternity roosts or hibernacula is regulated by grills. Bats are, therefore, excluded from further assessment.

The Sugar Loaf Woodlands SAC, particularly its veteran trees within the old sessile oak woods with ***Ilex*** and ***Blechnum*** habitat component, is potentially sensitive to recreation. The SAC lies approx. 1km from development in Abergavenny, indicating that it is likely to be within walking distance for new local residents. While Natural Resources Wales' Core Management Plan[103] does not refer to low recreational pressure as a potential management requirement for the site, it is considered that the extension of Abergavenny may lead to recreational pressure effects in-combination with growth in the Bannau Brycheiniog National Park Local Development Plan (LDP). Therefore it cannot be excluded, and the site is screened in for Appropriate Assessment.

The Cwm Clydach Woodlands SAC is not considered to be particularly sensitive to recreational pressure. The ground vegetation beneath the beech woodland canopy is relatively sparse and the negative impacts of trampling are therefore likely to be limited. However, other disturbance effects have been identified, particularly fly-tipping of domestic and recreational waste along roadsides leading through the SAC. However, the barriers that have been installed, have been successful in reducing the incidence of fly-tipping. Provided that these barriers are maintained, it is considered that the Monmouthshire LP will not result in LSEs on the Cwm Clydach Woodlands SAC. The site therefore can be screened out and requires no further consideration in an Appropriate Assessment.

The Aberbargoed Grasslands SAC, designated for its ***Molinia*** meadows, are not considered vulnerable to recreational pressure due to their robust tussock structure. Said structure also makes such grasslands difficult to walk through such that they are not generally popular for recreation. However, in the past anti-social behaviours such as off-roading and burning have occurred on the grasslands. However, in 2005 Caerphilly Council were successful in obtaining Heritage Lottery funding to establish a conservation officer role for the site. In combination with a programme for education and establishing a newsletter for ongoing conservation activities within the site, this has improved the anti-social behaviours. Furthermore, given the distance of the Aberbargoed Grasslands SAC to Monmouthshire, it is considered that the Replacement Local Development Plan will not result in LSEs on the SAC.

The Coed y Cerrig SAC comprises alluvial forests in a valley bottom and is likely to be fairly popular for recreation. For example, the Coed-y-Cerrig National Nature Reserve is advertised as a place to visit on the Bannau Brycheiniog National Park website[104]. The Core Management Plan for the SAC highlights that recreational access has the potential to result in significant trampling damage to the site. However, the SAC has a circular boardwalk in place. Due to the ground being so wet, most visitors stick to the boardwalks provided. Given this, the Coed y Cerrig SAC is screened out from Appropriate Assessment.

The following policies of the Replacement Local Development Plan have been screened in for Appropriate Assessment because they allocate residential dwellings or encourage tourism, likely leading to increased recreational pressure and therefore LSEs on several European sites:

- Strategic Policy S1 – Growth Strategy

[103] https://naturalresources.wales/media/674063/Sugar_Loaf_Woodlands_core_management_plan_Mar_2008%20_A_.pdf [Accessed on the 09/08/2024]
[104] http://www.breconbeacons.org/coed-y-cerrig [Accessed on 09/08/2024]

- Strategic Policy S2 – Spatial Distribution of Development – Settlement Hierarchy
- Policy H1 – Residential Development in Primary and Secondary Settlements
- Policy H2 – Residential Development in Main Rural Settlements
- Policy H3 – Residential Development in Minor Rural Settlements
- Policy HA1 - Land to the East of Abergavenny
- Policy HA2 – Land to the East of Caldicot
- Policy HA3 - Land at Mounton Road, Chepstow
- Policy HA4 – Land at Leasbrook, Monmouth
- Policy HA5 – Land at Penlanlas Farm, Abergavenny
- Policy HA6 – Land at Rockfield Road, Monmouth
- Policy HA7 – Land at Drewen Farm, Monmouth
- Policy HA8 – Land at Tudor Road, Wyesham, Monmouth
- Policy HA9 – Land at former MOD Land, Caerwent
- Policy HA10 – Land South of Monmouth Road, Raglan
- Policy HA11 – Land-east of Burrium Gate, Usk
- Policy HA12 – Land west of Trem yr Ysgol, Penperlleni
- Policy HA13 – Land adjacent to Piercefield Public House, St Arvans
- Policy HA14 – Land at Churchfields, Devauden
- Policy HA15 – Land east of Little Mill
- Policy HA16 – Land North of Little Mill
- Policy HA17 – Land adjacent to Llanellen Court Farm, Llanellen
- Policy HA18 – Land West of Redd Landes, Shirenewton
- Strategic Policy S12 – Visitor Economy

4.5 Background to Loss of Functionally Linked Land

While most European sites have been geographically defined to encompass the key features that are necessary for coherence of their structure and function, and the support of their qualifying features, this is not always the case. A diverse array of qualifying species including birds, bats and amphibians are not confined to the boundary of designated sites.

For example, the highly mobile nature of both wildfowl and heathland birds implies that areas of habitat of crucial importance to the maintenance of their populations are outside the physical limits of European sites. Despite not being designated, this area is still integral to the maintenance of the structure and function of the interest feature on the designated site and, therefore, land use plans that may affect such areas should be subject to further assessment. Examples of other mobile qualifying species are great-crested newts and bats. The latter animal group is known to travel considerable distances from their roosts to feeding sites. For example, in a 2001 study, female adult Bechstein's bats regularly undertook commuting distances of up to 1km[105]. However, it is known that bat home ranges can be between 1-1.5km, with some individuals ranging up to 2.5km distance. Both spring migrations or regular foraging trips might take these species beyond the designated site boundary.

[105] Kerth G., Wagner M. & Koenig B. 2001. Roosting together, foraging apart: Information transfer about food is unlikely to explain sociality in female Bechstein's bats (***Myotis bechsteinii***). Behavioral Ecology and Sociobiology 50: 283-291.

There is now an abundance of authoritative examples of HRA cases on plans affecting bird populations, where the potential importance of functionally linked land is recognised[106]. For example, bird surveys in relation to a previous HRA established that approximately 25% of the golden plover population in the Somerset Levels and Moors SPA were affected while on functionally linked land, and this required the inclusion of mitigation measures in the relevant plan policy wording. Another important case study originates from the Mersey Estuary SPA / Ramsar, where adjacently located functionally linked land had a peak survey count of 108% of the 5 year mean peak population of golden plover. Similar to the above example, this led to considerable amendments in the planning proposal to ensure that the site integrity was not adversely affected.

Generally, the identification of an area as functionally linked land is now a relatively straightforward process. However, the importance of non-designated land parcels may not be apparent and require the analysis of existing data sources to be firmly established. In some instances, data may not be available at all, requiring further survey work.

4.5.1 Screening for LSEs

The following European sites within 15km of Monmouthshire are susceptible to the loss of functionally linked land because they are designated for mobile qualifying species (the site that is screened in for Appropriate Assessment following discussion in the text is marked in **bold**):

- **Usk Bat Sites SAC**
- **Wye Valley and Forest of Dean Bat Sites SAC**
- **Severn Estuary SPA / Ramsar**
- Aberbargoed Grasslands SAC

The lesser horseshoe bats in the Usk Bat Sites SAC are not only dependent on their roosts and foraging habitat in the SAC, but potentially also on habitat that lies outside the designated site boundary. Feeding areas and commuting routes (flightlines) outside the designation may therefore be integral to sustaining the bat population. The area of greatest bat activity surrounding a roost is defined as the Core Sustenance Zone (CSZ)[107], however this is not available for all sites and / or bat species. Generally, lesser horseshoe bats forage between 2 and 3km from their roost but they have been observed to range up to 4km in their nightly foraging trips[108]. The Bat Conservation Trust identifies a weighted average CSZ of 2km for lesser horseshoe bats. It is therefore recognised that linear features (required to navigate) and permanent pasture / unimproved grassland (favoured feeding areas) and woodlands within this distance outside the SAC boundary need to be maintained. Given that the Usk Bat Sites SAC is partially located within Monmouthshire and lies close to several settlements such as Gilwern, residential and employment site allocations might lead to LSEs on this SAC through the loss of supporting habitat. The site is therefore screened in for Appropriate Assessment.

The Wye Valley and Forest of Dean Bat Sites SAC lies partly within Monmouthshire and is designated for both its lesser and greater horseshoe bat populations. Relating to its lesser horseshoe bat population a CSZ of 2km therefore applies as for the Usk Bat Sites SAC above. Radio-tracking research on greater horseshoe bats has shown that they make longer foraging trips foraging from their roost sites than lesser horseshoe bats, up to 9-10km from their roost[109] [110]. This bat species uses commuting corridors along linear landscape features and forages in permanent pasture and woodland. The Bat Conservation Trust identifies a weighted average CSZ of 3km for greater horseshoe bats. Any linear features (required for navigation) and permanent pasture / unimproved grassland (favoured feeding areas) within this distance outside of the SAC's boundary need to be maintained. The Wye Valley and Forest of Dean Bat Sites SAC is partly located within Monmouthshire and the allocation of residential and employment sites

[106] Chapman C & Tyldesley D. 2016. Functional linkage: How areas that are functionally linked to European sites have been considered when they may be affected by plans and projects – A review of authoritative decisions. Natural England Commissioned Reports 207: 73pp.
[107] https://cdn.bats.org.uk/pdf/Resources/Core_Sustenance_Zones_Explained_04.02.16.pdf?mtime=20190219173135 [Accessed on the 28/10/2019]
[108] Schofield H.W. 2008. The Lesser Horseshoe Bat Conservation Handbook.
[109] Billington G. 2008. Radio-tracking Study of Greater Horseshoe Bats at Dean Hall, Littledean, Cinderford. Natural England Commissioned Report NERR012..
[110] Billington G. 2009. Radio Tracking Study of Greater Horseshoe Bats at Dean Hall, Littledean, Cinderford. Natural England Commissioned Report. NECR021.

in the Monmouthshire LP might therefore lead to LSEs on this SAC through the loss of supporting habitat. The site is therefore screened in for Appropriate Assessment.

The Severn Estuary SPA / Ramsar, designated for several species of waterfowl and its overall waterbird assemblage, supports several bird species that might regularly move beyond the designated site boundary. Above all, functionally linked land is relevant to Bewick's swans, which graze on a range of soft meadow grasses beyond the SPA's / Ramsar's site boundary, including wet meadows comprising ***Agrostis stolonifera*** and ***Alopecurus geniculatus***. The qualifying waterfowl assemblage also includes European white-fronted geese, which commute up to 10km to their daytime foraging sites, which might include functionally linked farmland and wetland. It is considered that the functional integrity of the Severn Estuary SPA / Ramsar partly depends on land beyond its site boundary. LSEs of the Monmouthshire LP on the SPA / Ramsar cannot be excluded and the site is screened in for Appropriate Assessment.

The marsh fritillary butterfly population in the Aberbargoed Grasslands SAC is a species that is known to require relatively large areas of suitable habitat for a population to remain functional. It is generally considered that 50ha of suitable habitat will suffice to maintain a sustainable population[111]. The SAC itself is 39.6ha in size and not all of it comprises the butterfly's preferred habitat of wet grassland and devil's-bit scabious, the caterpillars only foodplant. As such it is likely that the butterfly population from the Aberbargoed Grasslands SAC will also depend on using habitat patches outside the European site that contain significant areas of devils bit scabious. However, given that the boundary of Monmouthshire is approx. 12.5km away, it is considered unlikely that the Plan's implementation would result in the loss of functionally linked land for the marsh fritillary butterfly. The site is screened out from Appropriate Assessment.

The following policies of the Replacement Local Development Plan have been screened in for Appropriate Assessment because they allocate residential or employment growth, potentially leading to the loss of functionally linked land and LSEs on the above identified European sites:

- Strategic Policy S1 – Growth Strategy
- Strategic Policy S2 – Spatial Distribution of Development – Settlement Hierarchy
- Policy H1 – Residential Development in Primary and Secondary Settlements
- Policy H2 – Residential Development in Main Rural Settlements
- Policy H3 – Residential Development in Minor Rural Settlements
- Policy HA1 - Land to the East of Abergavenny
- Policy HA2 – Land to the East of Caldicot
- Policy HA3 - Land at Mounton Road, Chepstow
- Policy HA4 – Land at Leasbrook, Monmouth
- Policy HA5 – Land at Penlanlas Farm, Abergavenny
- Policy HA6 – Land at Rockfield Road, Monmouth
- Policy HA7 – Land at Drewen Farm, Monmouth
- Policy HA8 – Land at Tudor Road, Wyesham, Monmouth
- Policy HA9 – Land at former MOD Land, Caerwent
- Policy HA10 – Land South of Monmouth Road, Raglan
- Policy HA11 – Land-east of Burrium Gate, Usk
- Policy HA12 – Land west of Trem yr Ysgol, Penperlleni
- Policy HA13 – Land adjacent to Piercefield Public House, St Arvans
- Policy HA14 – Land at Churchfields, Devauden

[111] Butterfly Conservation, Dorset. 2009. Available at: https://butterfly-conservation.org/sites/default/files/ni-marsh-frit-leaflet-july-2010.pdf [Accessed on the 23/08/2019]

- Policy HA15 – Land east of Little Mill
- Policy HA16 – Land North of Little Mill
- Policy HA17 – Land adjacent to Llanellen Court Farm, Llanellen
- Policy HA18 – Land West of Redd Landes, Shirenewton
- Strategic Policy S10 – Employment Sites Provision
- Policy EA1 – Employment Allocations
- Policy EA2 – Protected Employment Sites
- Strategic Policy S12 – Visitor Economy
- Policy W3 – Identified Waste Management Sites

4.6 Background to Water Quality

The quality of the water that feeds European sites is an important determinant of the nature of their habitats and the species they support. Poor water quality can have a range of environmental impacts:

- At high levels, toxic chemicals and metals can result in immediate death of aquatic life, and can have detrimental effects even at lower levels, including increased vulnerability to disease and changes in wildlife behaviour.
- Eutrophication, the enrichment of plant nutrients in water, increases plant growth and consequently results in oxygen depletion. Algal blooms, which commonly result from eutrophication, increase turbidity and decrease light penetration. The decomposition of organic wastes that often accompanies eutrophication deoxygenates water further, augmenting the oxygen depleting effects of eutrophication. In the marine environment, nitrogen is the limiting plant nutrient and so eutrophication is associated with discharges containing available nitrogen.
- Some pesticides, industrial chemicals, and components of sewage effluent are suspected to interfere with the functioning of the endocrine system, possibly having negative effects on the reproduction and development of aquatic life.

The most significant issue in relation to the Monmouthshire LP is the discharge of treated sewage effluent into surface watercourses, which is likely to increase the nutrient concentration, most importantly phosphate levels, in European sites that are hydrologically linked to these watercourses. The LP assessed in this HRA provides for development in the Dwr Cymru Welsh Water catchment, responsible for the public water supply and waste water treatment for large parts of Wales.

4.6.1 Screening for LSEs

The following European sites within 15km of Monmouthshire are sensitive to changes in water quality:

- **River Usk SAC**
- **River Wye SAC**
- **Severn Estuary SAC**
- **Severn Estuary SPA / Ramsar**
- Llangorse Lake SAC

The River Usk SAC is a riverine freshwater system of plain to montane levels with ***Ranunculion fluitantis*** and ***Callitricho-Batrachion*** vegetation. While this is a non-primary feature of the SAC it is essential in supporting the primary Annex II species, such as the qualifying fish and the otter. The Core Management Plan[112] published by Natural Resources Wales highlights the water quality in the system as a primary determinant of its ecological status, which is currently classified as unfavourable. While the main water quality impact in this catchment originates from agriculture, pollutants from sewage effluent, particularly increases in phosphorus concentrations, have the potential to increase the abundance of filamentous algae and to decrease the aquatic flowering plants. Eutrophication can lead to reduced dissolved

[112] https://naturalresources.wales/media/673384/River_Usk%20SAC%20core%20plan.pdf [Accessed on the 23/08/2019]

oxygen concentrations, which in turn reduces the viability of fish populations. The River Usk SAC is therefore screened in for Appropriate Assessment.

Given the similar qualifying features to the River Usk SAC, the River Wye SAC is also sensitive to aquatic pollutants. Natural England's Site Conservation Objectives Supplementary Advice Note highlights that elevated nutrient levels in the SAC, especially the concentration of phosphorus, are likely to lead to eutrophication. This might change plant growth and community composition of the 'water courses of plain to montane levels' qualifying feature, as well as having knock-on effects (e.g. loss of substrate for spawning and early life stages, reduced dissolved oxygen (DO) concentrations, increased turbidity) on fish species, such as Atlantic salmon and shad, which generally require high DO and clear water. The Monmouthshire LP makes a provision for 6,210 new dwellings and up to 6,240 new jobs (57ha of employment space), which will increase the production of sewage effluent and therefore input of phosphorus into the River Wye SAC. There is also the potential for industrial pollutants to be affecting the SAC, including pollutants such as zinc, cadmium and copper. Overall, LSEs of the Monmouthshire LP on the River Wye SAC cannot be excluded, and the site is therefore screened in for Appropriate Assessment.

The Severn SAC is designated for several habitats (e.g. estuaries, mud- and sandflats, Atlantic salt meadows) and species (lampreys, twaite shad) that are highly sensitive to changes in water quality. The document jointly published by Natural England and Natural Resources Wales highlights physico-chemical parameters, such as oxygen, nutrients and turbidity in the water column as a primary attribute for protecting the integrity of the SAC. Significant changes to any of these parameters could trigger an increase in phytoplankton or macroalgal biomass, leading to changes in the distribution (including recruitment and spawning processes) of the qualifying fish species. Changes to water quality, such as reduced dissolved oxygen concentrations, are also known to act as barriers to migration for river lamprey, brook lamprey and twaite shad. Overall, LSEs of the Monmouthshire LP on the Severn Estuary SAC cannot be excluded, and the site is therefore screened in for Appropriate Assessment.

The Severn Estuary SPA / Ramsar, designated for individual waterbirds as well as its composite waterfowl assemblage, is considered to be sensitive to water quality issues. The Severn River Basin Management Plan states that only 17% of the estuarine water bodies currently achieve good ecological status, with the remainder being at moderate status. On page 13, Natural England's Site Improvement Plan specifically highlights water pollution as a threat to the SPA / Ramsar[113]. This high nutrient loading may lead to an increase in benthic macroalgae, which have been identified in several locations in the Severn Estuary SPA / Ramsar, which is likely to have negative knock-on impacts on resident invertebrate communities. In turn, eutrophication effects could cascade up the food chain affecting the qualifying bird species. For example, increased nutrient input might change the sward composition of the saltmarsh, affect the Bewick's swans' ability to forage and ultimately impact the availability of adequate feeding habitat within the SPA / Ramsar. Ultimately, it is to be noted that any negative impacts of nutrient loading on the qualifying features in the SPA / Ramsar will occur as indirect effects on the birds' preferred foraging habitat and prey species. The Appropriate Assessment section of this report will therefore focus on discussing the Severn Estuary SAC, as this provides the essential supporting habitats for the SPA's / Ramsar's waterfowl species. Therefore, while LSEs of the Monmouthshire LP on the Severn Estuary SPA / Ramsar cannot be excluded, the site is screened out from Appropriate Assessment.

The Llangorse Lake SAC is a natural eutrophic lake, and its plants and animals are highly sensitive to changes in water quality. Furthermore, given that the Afon Llynfi is its only water outlet, any pollutants also remain within the lake for long periods. A significant portion of the current water pollutants derive from nearby agricultural practices and septic tanks. However, the lake is located in a lowland catchment and receives its hydrological input from a very small geographic area. Monmouthshire lies approx. 11.4km to the south-east of the Llangorse Lake SAC and is therefore considered to be beyond its hydrological catchment. Furthermore, the SAC is upstream of any watercourses that would be expected to receive wastewater or industrial run-off from development in Monmouthshire. As such it is considered that there is no hydrological connectivity between the LP area and the SAC. The Llangorse Lake SAC is screened out from Appropriate Assessment.

The following policies of the Replacement Local Development Plan have been screened in for Appropriate Assessment because they allocate residential or employment growth, which might lead to

[113] http://publications.naturalengland.org.uk/publication/4590676519944192 [Accessed on the 28/10/2019]

LSEs on designated freshwater and marine sites through increased sewage effluent and the release of toxic pollutants:

- Strategic Policy S1 – Growth Strategy
- Strategic Policy S2 – Spatial Distribution of Development – Settlement Hierarchy
- Policy H1 – Residential Development in Primary and Secondary Settlements
- Policy H2 – Residential Development in Main Rural Settlements
- Policy H3 – Residential Development in Minor Rural Settlements
- Policy HA1 - Land to the East of Abergavenny
- Policy HA2 – Land to the East of Caldicot
- Policy HA3 - Land at Mounton Road, Chepstow
- Policy HA4 – Land at Leasbrook, Monmouth
- Policy HA5 – Land at Penlanlas Farm, Abergavenny
- Policy HA6 – Land at Rockfield Road, Monmouth
- Policy HA7 – Land at Drewen Farm, Monmouth
- Policy HA8 – Land at Tudor Road, Wyesham, Monmouth
- Policy HA9 – Land at former MOD Land, Caerwent
- Policy HA10 – Land South of Monmouth Road, Raglan
- Policy HA11 – Land-east of Burrium Gate, Usk
- Policy HA12 – Land west of Trem yr Ysgol, Penperlleni
- Policy HA13 – Land adjacent to Piercefield Public House, St Arvans
- Policy HA14 – Land at Churchfields, Devauden
- Policy HA15 – Land east of Little Mill
- Policy HA16 – Land North of Little Mill
- Policy HA17 – Land adjacent to Llanellen Court Farm, Llanellen
- Policy HA18 – Land West of Redd Landes, Shirenewton
- Strategic Policy S10 – Employment Sites Provision
- Policy EA1 – Employment Allocations
- Policy EA2 – Protected Employment Sites
- Strategic Policy S12 – Visitor Economy
- Policy W3 – Identified Waste Management Sites

4.7 Background to Water Quantity, Level and Flow

In addition to water quality, both the water level and flow (and its natural diurnal and annual variation) are important determinants of the ecological status of European sites. Hydrological processes are critical in influencing habitat characteristics, including current velocity, water depth, wetted area, dissolved oxygen levels and water temperature. In turn these habitat features determine the short- and long-term viability of plant and animal species, as well as overall ecosystem composition.

A highly cited review paper summarised the ecological effects of reduced flow in rivers[114]. Droughts (ranging in their magnitude from flow reduction to a complete loss of surface water) have both direct and indirect effects on stream communities. For example, a marked direct effect is the loss of water and habitat for aquatic organisms. Indirect effects include a deterioration in water quality, changes to the

[114]Lake P.S. 2003. Ecological effects of perturbation by drought in flowing waters. Freshwater Biology 48: 1161-1172.

food resources and alterations in interspecific interactions. An increased stability of baseflow and a reduction in the natural flow variability of rivers has been linked to the excessive growth of macrophytes and a reduction in fish populations[115].

The variability in hydrological discharge does not only have ecosystem-level effects, but also affects specific functional groups and species more directly. Anadromous fish, the qualifying features of several of Monmouthshire's European sites, are especially sensitive to water fluctuations and flow variability. This is primarily because their life stages critically depend on specific flow levels. For example, a recent modelling study demonstrated that low-flow conditions in summer, a critical time when adult anadromous fish must reach their upstream spawning grounds, significantly reduces production in salmonids[116].

4.7.1 Screening for LSEs

The following European sites within 15km of Monmouthshire are sensitive to changes in their water quantity, level and flow (the sites that are screened in for Appropriate Assessment following discussion in the text are marked in **bold**):

- River Usk SAC
- River Wye SAC
- Severn Estuary SAC
- Severn Estuary SPA / Ramsar
- Aberbargoed Grasslands SAC
- Llangorse Lake SAC
- Coed y Cerrig SAC

The integrity of the River Usk SAC is dependent on both the volume and the stability of water flow. The Conservation Objectives for the SAC state that the quantity of water, including the natural flow variability, is to be maintained or restored to maintain the site's qualifying features in the future[117]. Hydrological processes, most importantly river flow level and variability, are critical in determining various habitat properties, such as current velocity, water depth and dissolved oxygen levels. Furthermore, the water depth and flow velocity influence the ability of adult anadromous fish of reaching their upstream spawning grounds. Species of shad are particularly sensitive to variations in flow levels. An ideal flow regime is to encourage high flows in March-May to stimulate upstream migration and maximise the upstream penetration of adult fish. In June-September low flows should be encouraged to ensure that juveniles are not washed into saline water prematurely. The development outlined in the Monmouthshire LP will require the abstraction of water for households and industry, and therefore could result in LSEs on the River Usk SAC. This site is therefore screened in for Appropriate Assessment.

The River Wye SAC is designated for the same anadromous fish species as the River Usk SAC. As for the Usk, the natural flow regime is therefore also critical to all its qualifying fish species, particularly the shad. Since development allocated in the Monmouthshire LP could also be supplied with water abstracted from the River Wye SAC, LSEs cannot be excluded and the site is screened in for Appropriate Assessment.

Being hydrologically connected with, and therefore also being dependent on, both the River Usk SAC and the River Wye SAC, the Severn Estuary SAC is highly vulnerable to changes in water flow rates for several reasons. Firstly, changes in the water flow rate are likely to lead to increases in sediment erosion or accretion respectively, to which the seagrass in the estuary is highly sensitive. Furthermore, the SAC's biotopes are also considered to be sensitive to changes in salinity, such as a long-term increase in salinity. Water abstraction for the public water supply in Monmouthshire from the main rivers supplying the Severn Estuary SAC, might lead to decreased freshwater input and could, ultimately,

[115]Bunn S.E. & Arthington A.H. 2002. Basic principles and ecological consequences of altered flow regimes for aquatic biodiversity. Environmental Management 30: 492-507.
[116] Ohlberger J., Buehrens T.W., Brenkman S.J., Crain P., Quinn T.P. & Hilborn R. 2018. Effects of past and projected river discharge variability on freshwater production in an anadromous fish. Freshwater Biology 63: 331-340.
[117] Ibid.

increase salinity levels in the estuary. As such, LSEs of the Monmouthshire LP cannot be excluded, and the site is screened in for Appropriate Assessment.

The Severn Estuary SPA / Ramsar, which harbours several species of qualifying waterfowl and waders, is considered to have an indirect sensitivity to changes in the hydrological regime. It is unlikely that changes in the water flow rate would affect any of the qualifying species (e.g. Bewick's swans) directly, because there is no linking impact pathway. However, an altered hydrological regime would likely affect their supporting habitats, including the Atlantic salt meadows, and the mud- and sandflats. For example, this could occur through changes in the species composition of the saltmarsh and a subsequent impact on the suitability of the saltmarsh for the birds or changes to the pattern of habitat use. However, since this impact pathway is already screened in for the Seven Estuary SAC, which addresses impacts on the birds' supporting habitats, the Severn Estuary SPA / Ramsar is screened out from Appropriate Assessment regarding the impact pathway water quantity, level and flow.

The Aberbargoed Grasslands SAC is an area comprising 48% of humid grassland with impeded drainage. This grassland and its characteristic plant community is sustained by both groundwater and surface water flow, depending on the variable water table. While the hydrological regime is not explicitly mentioned in the site's Core Management Plan, the integrity of the site is clearly partly dependent on the continued supply of sufficient water. However, due to the site's relatively long distance of 12.7km to Monmouthshire and the fact that it only requires a limited amount of water, which will be associated with superficial deposits with poor drainage rather than underlying aquifers, it is considered unlikely that the Monmouthshire LP will result in LSEs on the SAC through changes in the water level. The site is therefore screened out from Appropriate Assessment.

The Core Management Plan for the Llangorse Lake SAC highlights that the site is sensitive to the hydrological input into the lake, which should follow a natural seasonal cycle. The lake only has a mean depth of 2-3m (with a maximum depth of 7.5m), which will be further reduced through the gradual infilling of the lake with sediment from its banks. Any changes to the water supply of the SAC, especially a reduction in inflow, is therefore likely to threaten the integrity of the site. However, Welsh Water produced a final Water Resource Management Plan in 2019. This identifies that there will be no adverse effects on Llangorse Lake SAC from public water supply up to 2050. The Core Management Plan highlights that no new structures that will reduce inflow should be established in the vicinity of the Llangorse Lake SAC. However, as discussed in the previous section, the SAC lies approx. 11.4km to the north-west of Monmouthshire, which is considered to be beyond its hydrological catchment. There is no realistic way in which the abstraction of water for new development in Monmouthshire would change the water quantity, level or flow in the SAC. The site is screened out from Appropriate Assessment.

The Coed Y Cerrig SAC comprises alluvial forest in a valley bottom, which is dependent on a constant supply of water to maintain its waterlogged conditions. A significant alteration in the water quantity supplied might cause a drying out of the site and might potentially affect the qualifying feature of the SAC. The Coed y Cerrig SAC is only approx. 294m from the River Usk and is therefore likely to be hydrologically connected with this river. Drinking water for the western part of Monmouthshire might be extracted from the River Usk, however an abstraction effect is likely to affect the river a relatively long distance downstream from the Coed y Cerrig SAC. Welsh Water produced a final Water Resource Management Plan in 2019. This identifies that there will be no adverse effects on this SAC from public water supply up to 2050. It is therefore concluded that there is no linking hydrological impact pathway between Monmouthshire and the SAC. The site is screened out from Appropriate Assessment.

The following policies of the Replacement Local Development Plan have been screened in for Appropriate Assessment because they allocate residential or employment growth, leading to increased water abstraction from local water resources and potentially LSEs on European sites through changes to the water quantity, level and flow:

- Strategic Policy S1 – Growth Strategy
- Strategic Policy S2 – Spatial Distribution of Development – Settlement Hierarchy
- Policy H1 – Residential Development in Primary and Secondary Settlements
- Policy H2 – Residential Development in Main Rural Settlements
- Policy H3 – Residential Development in Minor Rural Settlements

- Policy HA1 - Land to the East of Abergavenny
- Policy HA2 – Land to the East of Caldicot
- Policy HA3 - Land at Mounton Road, Chepstow
- Policy HA4 – Land at Leasbrook, Monmouth
- Policy HA5 – Land at Penlanlas Farm, Abergavenny
- Policy HA6 – Land at Rockfield Road, Monmouth
- Policy HA7 – Land at Drewen Farm, Monmouth
- Policy HA8 – Land at Tudor Road, Wyesham, Monmouth
- Policy HA9 – Land at former MOD Land, Caerwent
- Policy HA10 – Land South of Monmouth Road, Raglan
- Policy HA11 – Land-east of Burrium Gate, Usk
- Policy HA12 – Land west of Trem yr Ysgol, Penperlleni
- Policy HA13 – Land adjacent to Piercefield Public House, St Arvans
- Policy HA14 – Land at Churchfields, Devauden
- Policy HA15 – Land east of Little Mill
- Policy HA16 – Land North of Little Mill
- Policy HA17 – Land adjacent to Llanellen Court Farm, Llanellen
- Policy HA18 – Land West of Redd Landes, Shirenewton
- Strategic Policy S10 – Employment Sites Provision
- Policy EA1 – Employment Allocations
- Policy EA2 – Protected Employment Sites
- Strategic Policy S12 – Visitor Economy

5. Appropriate Assessment

5.1 Atmospheric Pollution

All traffic growth on major roads within 200m of the relevant European sites was modelled. This included both traffic growth due to Monmouthshire Local Plan and wider traffic growth on the road network over the plan period to 2033. The assessment is therefore inherently in combination with other plans and projects. All modelling results are presented in Appendix C. Oxides of nitrogen, ammonia and nitrogen deposition were modelled. Four scenarios were modelled:

- Baseline – the current situation based on traffic counts for the relevant roads.
- Future baseline – the situation in 2033 in the hypothetical situation of no traffic growth.
- Do minimum – the situation in 2033 allowing for traffic growth on the road network, including from other authorities (e.g. Blaenau Gwent) but excluding Monmouthshire Local Plan; and
- Do something – identical to the Do minimum scenario but including Monmouthshire Local Plan.

The difference between the Do something and Do minimum scenarios identifies the contribution of Monmouthshire Local Plan, while the difference between the Do something and Future baseline scenarios identifies the 'in combination' effect of all traffic growth. The air quality modelling is therefore inherently in combination with other plans or projects.

Paragraph 5.26 of Natural England guidance (the only detailed guidance on the issue)[118] states that '***An exceedance*** [of a critical level or load] ***alone is insufficient to determine the acceptability (or otherwise) of a project'***. Where an exceedance of the Critical Load is expected, it is also necessary to consider whether the forecast dose will be imperceptible. As per paragraph 4.25 of same guidance '… ***1% of critical load/level are considered by Natural England's air quality specialists (and by industry, regulators and other statutory nature conservation bodies) to be suitably precautionary, as any emissions below this level are widely considered to be imperceptible…There can therefore be a high degree of confidence in its application to screen for risks of an effect'***. However, the 1% threshold is not a damage threshold. Guidance goes on to state that Paragraph 5.28 of that guidance states '***In practice, where a site is already exceeding a relevant benchmark, the extent to which additional increments from plans and projects would undermine a conservation objective to 'restore' will involve further consideration of whether there is credible evidence that the emissions represent a real risk that the ability of other national or local measures and initiatives to otherwise reduce background levels will be compromised in a meaningful manner'*** [emphasis added].

5.1.1 Severn Estuary SAC/SPA/Ramsar

Three transects were modelled into this SAC/SPA/Ramsar site. These are transects E01a, E01b and E02b, all on the M48 road bridge as it traverses the site. The most sensitive designated habitat to atmospheric pollution is the saltmarsh habitat. Saltmarsh does not support significant lichen or bryophyte populations such that the appropriate critical level is 3 μgm^{-3}. For nitrogen deposition saltmarsh has a critical load range of 10-20 kgN/ha/yr. The lower part of the critical load range is appropriate to be used for upper saltmarsh (rarely inundated) while the upper part of the critical load range is appropriate for lower saltmarsh (frequently inundated).

All available critical loads (and levels) are based on research into impacts on 'rooted macrophytes' (i.e. conventional plants) or (for ammonia) lichens & bryophytes. In other words, they have all been based on impacts on plant communities which obtain their nutrients either through their roots or directly from atmosphere. Unvegetated intertidal mudflat has no such vegetation communities and therefore it is not considered sensitive to atmospheric nitrogen deposition.

5.1.1.1 NOx

Oxides of nitrogen (NOx) are not identified as a concern on any modelled transect as at no point on any transect will it exceed the critical level for all vegetation of 30 μgm^{-3}. Since the critical level is not forecast to be breached no adverse effect on integrity will arise notwithstanding traffic growth.

[118] http://publications.naturalengland.org.uk/publication/4720542048845824

5.1.1.2 Ammonia

The relevant critical level of 3 µgm^{-3} is not exceeded on any transect under any scenario for ammonia. Since the critical level is not forecast to be breached no adverse effect on integrity will arise notwithstanding traffic growth.

5.1.1.3 Nitrogen deposition

On the English side the nearest saltmarsh in the SAC (Transect E01b) is 20m from the road. At this point the modelled in combination effect from all traffic growth is 0.01 kgN/ha/yr, while on the Welsh side at 10m from the road it is 0.02 kgN/ha/yr. This is well below 1% of the critical load (10 kgN/ha/yr as a minimum) and therefore adverse effects on integrity can be dismissed. The forecast impact is very low despite the forecast in combination increase in traffic on the M48 because the modelled road is a bridge situated high above the SAC/SPA meaning the dispersion and deposition patterns are very different than if the road was at grade.

5.1.2 Wye Valley Woodlands SAC

Two transects were modelled into this SAC, transects E03 (A466) and E05 (A40), representing the two major roads within 200m of the SAC likely to be used by Monmouthshire traffic. Since the woodland for which the SAC is designated may support significant lichen or bryophyte populations the appropriate ammonia critical level is 1 µgm^{-3}. For nitrogen deposition the SAC woodlands have a critical load range of 10-20 kgN/ha/yr.

5.1.2.1 NOx

Oxides of nitrogen (NOx) are not identified as a concern on any modelled transect as at no point on any transect will it exceed the critical level for all vegetation of 30 µgm^{-3}. Since the critical level is not forecast to be breached no adverse effect on integrity will arise notwithstanding traffic growth.

5.1.2.2 Ammonia

The relevant critical level of 1 µgm^{-3} is exceeded throughout both transects under all scenarios due to background concentrations from existing sources such as agriculture. However, at the distances the SAC lies back from the road (100m and beyond), modelling shows that there is no impact of traffic growth (alone or in combination) on ammonia concentrations.

5.1.2.3 Nitrogen

At the closest point of the SAC to the road, the ‘in combination’ nitrogen impact is a maximum of 0.06 kgN/ha/yr or 0.6% of the lowest part of the critical load range. The contribution of the Monmouthshire Local Plan is also very small being 0.01 kgN/ha/yr on transect E03 and 0.02 kgN/ha/yr on transect E05. As a result a conclusion of no adverse effect on integrity alone or in combination can be reached.

5.1.3 Cwm Clydach Woodlands SAC/ Usk Bat Sites SAC

These two SACs are considered together because they both lie adjacent to A465 Heads of the Valleys Road at Daren-felen, with Cwm Clydach Woodlands SAC lying immediately beyond the Usk Bat Sites SAC to the south of the road. Three transects were modelled: E06, E07a and E07b. Transect E7a covers Cwm Clydach Woodlands SAC as well as Usk Bat Sites SAC. Cwm Clydach Woodlands is typically c. 50m from the road. Usk Bat Sites SAC is either side of the road, right up to roadside. Despite its name Usk Bat Sites SAC is designated for its habitats as well as its bat populations.

The part of Usk Bat Sites SAC relevant to this assessment (i.e. within 200m of the A465) is Management Unit 5 of Mynydd Llangatwg SSSI. That Management Unit contains the SAC interest feature ‘Tilio-Acerion forests of slopes, screes and ravines’. This habitat is of relatively low sensitivity to nitrogen deposition (with a critical load range of 15-20 kgN/ha/yr) but of high sensitivity to atmospheric ammonia due to the presence of lichens and bryophytes (critical level of 1 µgm^{-3}). The habitat within the relevant section of Cwm Clydach Woodlands SAC is W15a and W12a Fagus Sylvatica woodland, or scrub[119], which is an SAC interest feature (beech woodland) with a critical load range for nitrogen of 10-15 kgN/ha/yr.

[119] https://datamap.gov.wales/search/?title__icontains=Phase%202&abstract__icontains=Phase%202&keywords__name__icontai

5.1.3.1 NOx

Oxides of nitrogen (NOx) are not identified as a concern on any modelled transect as at no point on any transect will it exceed the critical level for all vegetation of 30 μgm^{-3}. Since the critical level is not forecast to be breached no adverse effect on integrity will arise notwithstanding traffic growth.

5.1.3.2 Ammonia

The relevant critical level of 1 μgm^{-3} is not exceeded on transect E06, or on E07a beyond 90m from the road. However, it is exceeded throughout the rest of E07a and throughout the entirety of transect E07b under all scenarios. This is due to background concentrations from existing sources such as agriculture. The in combination impact on ammonia concentrations does not exceed 1% of the critical level on transect E06 but does exceed 1% of the critical level within 70m of the road on transect E07a and within 50m of the road on transect E07b, although the contribution of Monmouthshire Local Plan is imperceptible in the modelling by 40m from the road, and 20m from the road, respectively. Adverse in combination effects cannot therefore be dismissed on purely numerical grounds.

5.1.3.3 Nitrogen

In combination nitrogen deposition rates exceed 1% of the critical load up to 50m from the road along transect E07a and 40m from the road on transect E07b, although the contribution of Monmouthshire Local Plan is imperceptible in the modelling beyond 10m from the road, and 5m from the road, respectively. As with ammonia, therefore, adverse in combination effects cannot therefore be dismissed on purely numerical grounds.

5.1.3.4 Interpretation

'In combination' effects on the two SACs from ammonia and nitrogen deposition from traffic growth on the A465 to 2033 cannot be dismissed. However, the A465 is one of the major trunk roads in Wales and is a main east–west route in South Wales along with the M4 motorway. Moreover, large sections of the road are being converted to dual carriageway by 2025. As such, traffic-related changes in air quality on the A465 are not a local (Monmouthshire) issues but a Wales-wide issue and is the responsibility of the Welsh Government or South Wales Trunk Road Agent (SWTRA). This is relevant because Joint Nature Conservation Committee (JNCC) guidance on the issue[120] states (pages 20/21) that: '***The trunk road network forms the core of the national transport system. Trunk roads are central to long distance travel and connectivity across the UK and traffic patterns on trunk roads are a consequence of predicted growth across the UK generally. The effects of development on traffic flows on truck roads are more appropriately taken into account as part of national and regional strategic plan level HRAs.'*** As such, this is considered to be an issue to be address at a strategic national scale rather than through the Monmouthshire Local Plan.

5.2 Recreational Pressure

5.2.1 Severn Estuary SPA / Ramsar

5.2.1.1 Existing Evidence Base

The Severn Estuary SPA / Ramsar is a destination with a unique funnel shape, meaning that it runs diagonally through several authorities, including Forest of Dean, Stroud and Monmouthshire. The site is likely to have a unique recreational draw on residents in these adjacent authorities and, given that the likelihood of visits decreases with distance from a destination, residents are likely to visit the stretches of the Severn Estuary SAC with suitable access points that are closest to home. However, Footprint Ecology undertook a visitor survey in Lydney (Forest of Dean) in 2017 to inform a recreation strategy for that part of the estuary[121]. A visitor survey was also undertaken by EPR in 2016 for the part of the SPA / Ramsar within Stroud District[122]. These surveys were undertaken to establish a

ns=Phase%202&purpose__icontains=Phase%202&f_method=or&limit=20&offset=0, and New map | DataMapWales (gov.wales)

[120] Main Report: Guidance on Decision-making Thresholds for Air Pollution (jncc.gov.uk)

[121] Liley D., Panter C. & Hoskin R. 2017. Lydney Severn Estuary Visitor Survey and Recreation Strategy. Unpublished report by Footprint Ecology for the Forest of Dean District Council. 55pp. Available at: https://www.footprint-ecology.co.uk/reports/Liley%20et%20al%202017%20Lydney%20Severn%20Estuary%20Visitor%20Survey%20and%20Recreation%20Strategy.pdf [Accessed on the 13/08/2024]

[122] Southgate J. & Colebourn K. 2016. Severn Estuary (Stroud District) Visitor Survey Report. Report for Stroud District Council. Ecological Planning & Research, Winchester. 68pp.

baseline of visitor pressure in the relevant parts of the SAC to these Councils, and to assess the potential impacts of residential growth in the respective authorities, similar to the development proposed in the Monmouthshire LP. The results of these surveys are not directly relevant to Monmouthshire, illustrated by the fact that the surveys did not capture visitors from Monmouthshire (likely due to the presence of stretches of the SAC much closer to home). Nevertheless, some of the patterns of visitor use highlighted in these surveys are likely to be similar in Monmouthshire (for example, the proportion of dog walkers), and are therefore discussed in the following.

5.2.1.2 Visitor survey

To obtain visitor data for the Severn Estuary SPA / Ramsar (and also the SAC), a survey (comprising visitor counts and interviews) was undertaken at four key access locations along the estuary. The survey followed a similar methodology to surveys carried out by Footprint Ecology in other European sites, which have provided the evidence base for numerous Habitats Regulations Assessments. To summarise, the key features of the survey methodology were:

- Interviewer roams survey location and approaches first adult seen (alone or part of a larger group) for interview – the interview involves a set of questions to obtain key information such as activity undertaken and home postcode; upon completion of the interview the next adult is approached
- Interviewer counts the number of adults, minors and dog walkers to get an overview of the 'busyness' of the site at a given location
- Survey day is divided into a morning (07:30 to 12:30) and an afternoon shift (12:30 to 17:30)
- Each location is to be surveyed on two days, a weekday (Monday to Friday) and a weekend day (Saturday and Sunday), avoiding public holidays and special events resulting in high footfall

Using satellite imagery and in collaboration with Monmouthshire's Countryside Team, AECOM identified four key access locations to the Severn Estuary SPA / Ramsar / SAC based on their proximity to existing conurbations, the presence of parking opportunities and dedicated foot access points. The following locations from east to west along the estuary were identified for surveying:

- Caldicot Coast Path (ST 48103 87124)
- Black Rock Car Park (ST 51308 88083)
- RSPB Newport Wetlands (ST 32771 82905)
- Lighthouse Inn Car Park (ST 30030 81596)

5.2.1.3 Key Results

The data summarised in Table 3 below provide the key results of the visitor survey. A fuller note on the survey is presented in Appendix D.

Table 3: Visitor counts (including adults and minors) at access points to the Severn Estuary SPA / Ramsar / SAC provided as totals and split by weekday / weekend.

Survey Location	Visitor Count Weekday	Visitor Count Weekend	Total Visitor Count
Caldicot Coast Path	73	54	127
Black Rock Car Park	58	212	268
RSPB Newport Wetlands	135	478	613
Lighthouse Inn Car Park	50	97	147

The total number of visitors varied significantly between survey locations. The RSPB Newport Wetlands was by far the busiest survey point (613 visitors over two survey days), followed by the Black Rock Car Park (268 visitors), Lighthouse Inn Car Park (147 visitors) and Caldicot Coast Path

(127 visitors). The relatively low visitor count at Caldicot is most likely due to it providing foot access only, whereas all other survey locations adjoin car parks. This increases accessibility and is expected to draw visitors from further afield, resulting in higher overall busyness.

In context, it appears that the stretch of the Severn Estuary SPA / Ramsar / SAC in southern Wales is busier than parts in other authorities, such as the Forest of Dean in England. For example, a visitor survey in Lydney showed that the busiest location had 98 people entering over two days[123]. That is a similar count to the one obtained for Lighthouse Inn Car Park in a single day of surveying. Visitor numbers ranged between 8 and 153 people across 20 survey locations in a survey conducted in the Humber Estuary[124]. Overall, these data indicate that the Severn Estuary SPA / Ramsar / SAC in Monmouthshire is already a key recreation destination for people (even in winter) and would be highly attractive to new residents moving to the wider area around the site. It also implies that recreational pressure is an impact pathway requiring thorough assessment in relation to future housing growth.

The geographic source of visitors was also assessed. Of the 188 interviewees, 80 (44.4%) visitors derive from Monmouthshire, the authority within which the surveyed stretch of the Severn Estuary SPA / Ramsar / SAC lies (Table 4). The second biggest contribution is made by Newport, where 40 (22.2%) of the interviewees live. Together, Monmouthshire and Newport account for 66.6% of the recreational burden in the estuary. Notable origins of visitors were also Cardiff (12 interviewees, 6.7%), Caerphilly (10 interviewees, 5.6%) and Torfaen (5 interviewees, 2.8%).

Table 4: Local Authorities from which visitors to the Severn Estuary SPA / Ramsar / SAC derived. Only authorities contributing over 1% to the recreational burden are shown.

Source of Visitors (Local Authority)	Number of Visitors	Percentage of Visitors (%)
Monmouthshire	80	44.4
Newport	40	22.2
Cardiff	12	6.7
Caerphilly	10	5.6
Torfaen	5	2.8
Forest of Dean	3	1.7
Bristol	2	1.1
Wiltshire	2	1.1
Total	**188**	**100**

The home postcodes of interviewees provide the key most important parameter that is used to identify recreational catchments. Typically, the 75th percentile of interviewees (i.e. the distance from the SPA / Ramsar from which 75% of interviewees originate) is used to denote the core recreational catchment. This cut-off point is used to remove the influence of outliers and to demark the catchment that forms the most likely visitor pool. Pooling the postcodes from all 'local' visitors (i.e. those on a day trip from home; n = 158), 75% of visitors travelled a linear Euclidean distance of 6.5km to the SPA / Ramsar. This core recreational catchment is broadly similar to those identified for stretches of the estuary in other geographic areas.

For example, a visitor survey carried out in the estuary in Stroud District in 2017 established a core catchment of 7.7km for that authority (though this has since been updated, see below). Survey work undertaken for the West of England authorities delineated a core catchment of 7.36km for survey

[123] Liley D, Panter C & Hoskin R. (2017). Lydney Severn Estuary Visitor Survey and Recreation Strategy. Unpublished report by Footprint Ecology for the Forest of Dean District Council.
[124] Fearnley H, Liley D & Cruickshanks K. (2012). Results of the recreational visitor surveys across the Humber Estuary. Unpublished report by Footprint Ecology for the Humber Management Scheme.

points in North Somerset and South Gloucestershire. One notable aspect of the various surveys undertaken in the Severn Estuary SPA / Ramsar / SAC is that the core recreational catchments, even though the surveys have been undertaken for different authorities, have a broad consistency of approx. 7km regarding the core catchment identified. This is useful since it is standard practice when European sites are involved for the affected authorities to agree on a standardized core catchment. For the Severn Estuary SPA / Ramsar / SAC it appears that 7km is a reasonable precautionary recreational buffer for all European sites.

Core recreational catchments were also drawn up for dog walkers and frequent visitors (ranging from daily visits to several visits per week). This was done to delineate the geographic zone that user groups with the highest ecological impacts on overwintering birds derive from. For dog walkers the core recreational catchment is approx. 3.1km, whereas for frequent visitors the core catchment is approx. 1.9km. This is notable because it highlights that the visitors with the highest impact potential come from a relatively small zone around the European sites.

Stroud Council (in England) and Forest of Dean Council (also in England) have both recently increased the recreational catchment in their area for Severn Estuary from 7km to 12.6km, based on more recent visitor survey from 2022[125]. It is to be expected that different parts of the Severn Estuary have different recreational catchments, and the survey data for Monmouthshire clearly indicates a smaller core catchment. However, there is also value in authorities around the Severn Estuary adopting a consistent core catchment. Therefore, it may be advisable for Monmouthshire Council to adopt 12.6km as their core catchment, and thus the zone within which financial contributions to recreational pressure mitigation on the SAC/SPA/Ramsar site would be collected.

5.2.1.4 Implications of the Visitor Survey for Monmouthshire

The data from the visitor survey presented here, which suggest that Monmouthshire contributes by far the highest proportion of visitor pressure in the stretch of the Severn Estuary SPA / Ramsar / SAC that was surveyed, have implications for the Monmouthshire RLDP. The catchment zones for dog walkers and frequent visitors, the user groups with the highest disturbance impacts, include both these Strategic Growth Areas. Furthermore, of the 188 interviewees, 19 (23.8%) live in Caldicot, further underlining the importance of this part of Monmouthshire to the SPA's / Ramsar's / SAC's visitor pool. Allocations within 7km and 12.6km of the SPA/Ramsar site are identified in Tables 5 and 6 below. It can be seen that increasing the catchment to 12.6km would only capture one more residential development site.

Table 5. Residential and Mixed Use Sites with 7km Severn Estuary SPA/Ramsar

Policy	Settlement	Site Name	Units	Area (ha)
HA3	Chepstow	Land at Mounton Road, Chepstow	146	12.8
HA2/ EA1m	Severnside	Land to the East of Caldicot	770	64
HA9/E A1l	Severnside	Land at Former MOD land, Caerwent	40	4.2
HA13	St Arvans	Land adjacent to Piercefield Public House, St Arvans	16	1.1
HA18	Shirenewton	Land west of Redd Landes, Shirenewton	26	1.76

Table 6. Residential Sites within 7km to 12.6km Severn Estuary SPA/Ramsar

Policy	Settlement	Site Name	Units	Area (ha)
HA14	Devauden	Land at Churchfields, Devauden	20	1

[125] Agenda Item 9 - Appendix A - Severn Estuary Mitigation Strategy.pdf (moderngov.co.uk)
https://www.stroud.gov.uk/environment/planning-and-building-control/conservation-biodiversity-listed-buildings-trees-and-hedgerows/habitats-regulations-assessment-hra/
https://www.stroud.gov.uk/environment/planning-and-building-control/conservation-biodiversity-listed-buildings-trees-and-hedgerows/habitats-regulations-assessment-hra/severn-estuary-special-area-of-conservation-sac/

Given the high sensitivity of the SPA / Ramsar to impacts resulting from recreational pressure, adverse effects on its site integrity due to additional residential development cannot be excluded. It is anticipated that mitigation measures will be required to avoid adverse effects on the SPA / Ramsar. These could be delivered in the form of Strategic Access Management and Monitoring (SAMM) in the estuary itself, and / or through access enhancements and improvements to appropriately sited, existing or newly developed greenspaces. This section does not advocate or propose a full mitigation strategy, but rather scopes out the options that are available to the Council to address the issue of recreational pressure.

In England, authorities within the recreational catchment of sites that are sensitive to recreational pressure have developed SAMM strategies to avoid adverse effects on the European sites; the most prominent examples being the Thames Basin Heaths SPA and the Dorset Heaths SPA. For example, to protect the Dorset Heaths, the authorities proposing residential development within the SPA catchment zones have set out the Dorset Heathlands Planning Framework Supplementary Planning Document (SPD)[126]. For example, in the case of the Dorset Heaths, the SPD proposes a series of SAMM projects, including undertaking of educational activities and employing wardens to manage visitor pressure. The funding for these measures is collected through a combination of Community Infrastructure Levy (CIL) and Section 106 agreements (planning obligations) payable by the developer. It is considered that similar measures (and funding mechanisms) could be deployed in the Severn Estuary SPA / Ramsar, to help manage recreational pressure. Such measures would have to be identified and developed in collaboration with all key stakeholders (i.e. authorities, private landowners) and in consultation with Natural Resources Wales.

The visitor survey data indicate that there are ample opportunities for SAMM projects in Monmouthshire's section of the Severn Estuary SPA / Ramsar / SAC. Most visitors are not aware of (125 interviewees, 66.5%) or unsure (21 interviewees, 11.2%) whether any conservation designations apply to the site. Furthermore, only one interviewee (0.5%) indicated that they knew about the site's SPA / Ramsar status and its international importance to overwintering birds. Regarding active conservation measures, a total of 87 interviewees (46.3%) had come across information boards along the estuary. Only 18 interviewees (9.6%) indicated that they were aware of any signage (e.g. dog-on-lead signs) along the estuary. Furthermore, only 3 interviewees (1.6%) had noticed a ranger presence along the estuary. These were all recorded at the RSPB Newport Wetlands, indicating that these are likely to have been RSPB employees rather than rangers specifically managing recreation in the estuary. Overall, 82 interviewees (43.6%) are not aware of any measures that are in place to deliver conservation in the SPA / Ramsar / SAC.

Therefore, various SAMM measures along the estuary could be deployed to decrease the likely impact of future housing growth delivered under the RLDP. For example, enhanced signage (e.g. dog-on-lead signs covering the overwintering period) along the estuary is likely to increase public awareness and reduce disturbance to sensitive bird species. Changes in how the estuary is managed may also be beneficial to the Severn Estuary SPA / Ramsar / SAC, provided they support the site Conservation Objectives. While 155 interviewees (82.5%) did not provide any changes they would like to see in how the area is managed, 23 interviewees (12.2%) highlighted footpath improvements (particularly in Caldicot) and 5 interviewees (2.7%) wanted more dog bins (Appendix D). Improvements to footpaths along the estuary could be a key tool in discouraging off-track walking and reducing the number of major bird disturbance events.

Opening new areas of greenspace to the public or enhancing existing greenspaces is the second pillar of mitigating recreational pressure. Importantly, these alternative greenspaces should be less sensitive to disturbance, while aiming to recreate as best as possible a feeling of expanse and wilderness. Regarding the Monmouthshire LP, growth around Caldicot and Chepstow is of primary concern. Therefore, it is considered that enhanced greenspace provision should be a priority for the Caldicot area. The most obvious candidate for improvements would be the Caldicot Castle Country Park (CCCP), which is approx. equidistant from existing residential development in Caldicot than the Severn Estuary SPA / Ramsar and therefore represents a realistic destination alternative. The CCCP is also owned and operated by Monmouthshire County Council, which facilitates the delivery of

[126] The consultation draft of the Dorset Heathlands Planning Framework 2020-2025 can be found at: https://www.bournemouth.gov.uk/planningbuilding/PlanningPolicy/PlanningPolicyFiles/dorset-heathlands-planning-framework/dorset-heathlands-spd-2019-consultation.pdf [Accessed on the 30/06/2020].

mitigation measures compared to sites under multiple ownership. It is noted that the CCCP is already an attractive destination for visitors[127] and any mitigation measures deemed acceptable are likely to have to improve the capacity of the park to attract further visitors. A list of potential enhancements may include[128]:

- Provision of a variety of routes (ideally at least one circular route) leading out from the castle into the woodland
- Enhancements to the existing main car park off Church Road (e.g. increasing capacity, renewing surfacing, etc.)
- Provision of enhanced information boards along the key walking routes, which may address the cultural / historical heritage of the CCCP and ecological features of interest in the site
- Incorporation of Nedern Brook as a main feature into the walking routes starting at the Castle

Notwithstanding the provision of enhanced local greenspaces, it is noted that these cannot fully alleviate the increase in recreational pressure on European sites. Estuarine and costal sites in particular, such as the Severn Estuary SPA / Ramsar, have a unique recreational draw (illustrated by their large core catchments) and will continue to attract visitors regardless of other destination alternatives. The enhancement of non-designated greenspaces most likely fulfils its most important role in attracting local residents that have frequent and relatively short outings, including dog walkers, walkers and people exercising. Therefore, such an approach is considered to be particularly effective for residential development in Caldicot, for which future residential development is expected to follow a similar access pattern to that established in the visitor survey.

It is concluded that, providing an appropriate set of mitigation measures in and / or the wider area around the Severn Estuary SPA / Ramsar is delivered (in agreement with the Natural Resources Wales), the Monmouthshire LP will not result in adverse effects on the designated site regarding recreational pressure. Furthermore, AECOM recommends that appropriate reference to these mitigation measures is made in the relevant policies, such as policies providing for housing growth or addressing ecological features that present (and require protection) in Monmouthshire.

It is noted that relevant Deposit Site Allocation policies, with the exception of Site HA14 include reference to the site being within 7km of the Severn Estuary European Marine Site (site HA14 is within 12.6km) and that a financial contribution may be required as part of a mitigation strategy as well the SANG requirements to reduce recreational pressures on the features of the estuary. These requirements are set out in the following site-specific policies:

- HA2 – Land to the East of Caldicot
- HA3 – Land at Mounton Road, Chepstow
- HA9 – Land at Former MoD, Caerwent
- HA13 – Land adjacent to Piercefield Pub House, St Arvans
- HA18 – Land West of Redd Landes, Shirenewton

Policy NR2 – Severn Estuary Recreational Pressure also sets out requirements for proposals that would result in visitor pressure on the Severn Estuary SAC, SPA, Ramsar site, or Functionally Linked land will not be supported unless it can be demonstrated that no adverse impact on the integrity of the European Marine Site will occur.

The supporting text links this requirement to a Core Recreational Catchment Zone of 7km identified by the HRA.

AECOM recommends that the mixed use sites EA1m and EA1l are also included in this solution along with residential site HA14. As such AECOM recommends that the same policy

[127] The Caldicot Castle Country Park is widely advertised as an attractive destination for outings, for example on the Monmouthshire tourism website available at: https://www.visitmonmouthshire.com/Caldicot-Caldicot-Castle-and-Country-Park/details/?dms=3&venue=1000670 [Accessed on the 30/06/2020].

[128] Note that rather than focussing on a specific site, greenspace enhancements may also be delivered as a series of small-scale projects designed to improve access to multiple greenspaces or to encourage responsible recreation in the estuary. This would be analogous to the Heathland Infrastructure Projects (HIPs) delivered in the Dorset Heaths.

requirement is included in those policies as has already been included in other relevant allocations.

5.2.1.1 In-Combination Assessment

In addition to growth within Monmouthshire, new dwellings are currently planned within 7-12.6km of the SAC, SPA and Ramsar site in Cardiff, Torfaen, North Somerset, South Gloucestershire, Bristol, Stroud District, Forest of Dean District, and the Somerset Council area (previously including Sedgemoor, Somerset West & Taunton, and other districts). At least 50,000 dwellings are therefore likely to have been delivered within 12.6km of the SPA and Ramsar site to 2040 and probably more as the Local Plans of several local councils in the vicinity are in the process of being updated. However, the mitigation strategy identified above would address Monmouthshire's contribution to any such in combination effect.

5.2.2 Severn Estuary SAC

As identified in the screening section for LSEs, the Monmouthshire LP might also result in negative impacts on sensitive habitat features of the Severn Estuary SAC, including the estuary feature, the subtidal sandbanks, the sand- and mudflats, and the Atlantic salt meadows. In contrast to the SPA / Ramsar features which would mostly be subject to direct disturbance, the SAC features are likely to be affected by trampling, erosion, pollution and abrasion associated with boating activities. The estuaries feature of the SAC is defined as highly vulnerable to physical disturbance and abrasion, which could result from anchoring, power boats, jet skis, bait digging, littering and walking on sensitive habitat features. In the intertidal sand- and mudflats, boating, anchoring, trampling and the use of off-road vehicles are most likely to cause physical disturbance, such as the compaction of substratum. For example, trampling and the use of vehicles results in the collapse of burrows of clam species, heart urchin and razor shell. Due to the longevity of these species, these habitats have long recovery rates of up to five years following disturbance events. Physical disturbance and abrasion are also key issues for saltmarsh communities, where they can cause damage to individual plants and change the ecological structure of the sward. Furthermore, wash arising from boating increases saltmarsh erosion. The assessment and mitigation strategy relevant to Severn Estuary SPA/Ramsar would also serve to protect the SAC features.

It is generally considered that adverse effects on the site integrity of the Severn Estuary SAC could be avoided within the remit of a Strategic Access Management and Monitoring Strategy. While this would be primarily designed to mitigate recreational pressure on the SPA / Ramsar features, any suite of measures could be extended to include the SAC features. For example, information boards for the general public could be enhanced to provide background information on the negative impacts of boating or bait-digging, thereby helping to raise awareness. Furthermore, detailed information about the distribution of the most important SAC habitats could be provided to encourage that boating visitors avoid such areas. A Code of Conduct for boaters could be published online, via leaflets and on information boards.

There are also several policy mechanisms through which the Severn Estuary SAC could be protected, for example by introducing the following wording into a policy addressing the protection of European sites in Monmouthshire: **'Any development proposals that would increase visitor access to sensitive habitat features in the Severn Estuary SAC, SPA and Ramsar site, especially on to saltmarsh and mudflat habitat, will not be supported unless no adverse effect on the integrity of the sites could be confirmed.'**

5.2.2.1 In-Combination Assessment

The in combination assessment for Severn Estuary SPA/Ramsar site also applies to Severn Estuary SAC.

5.2.3 Usk Bat Sites SAC

Primarily, the Usk Bat Sites SAC is designated for its lesser horseshoe bat population of European significance. Both the maternity roost and the numerous hibernation sites (e.g. in Agen Allwedd Cave and Clydach Gorge Cave) are highly sensitive to recreational disturbance due to potential changes to a variety of habitat conditions, such as ventilation, temperature, light level and noise level.

Given the high sensitivity of this bat species to disturbance, the most important caves have been gated for conservation reasons, including Agen Allwedd, Craig a Ffynnon and Daren Cilau. Access to these caves requires prior application for a permit to the Mynydd Llangatwg cave Management Advisory Committee[129]. However, numerous other roost and hibernation sites are not gated and as such potentially sensitive to higher visitor footfall. However, the Bannau Brycheiniog National Park (BBNP) website identifies caving as a potentially dangerous activity that requires prior consent of a local caving club and the assistance of a qualified expedition leader[130]. Furthermore, the Caves of South Wales website outlines the Cave Conservation Code, which aims at minimising impacts on cave biota as well as geological formations[131].

In the BBNP visitor survey, Brecon Canal was identified by 154 interviewees (9%) as one of the destinations during their visit. The Brecon Canal was the closest destination to the Usk Bat Sites SAC (1.7km) given by interviewees, which may also involve a visit to the SAC. Assuming the same proportion of Monmouthshire visitors than that obtained for the whole visitor survey dataset (i.e. 8%), this would imply that the area of NP in proximity to the Bat Sites SAC is visited by roughly 12 visitors travelling from Monmouthshire per every two days (the survey effort in the BBNP). It should also be highlighted that caving was not among the most popular recreational activities mentioned by interviewees and as such is likely to be carried out by very few people. Given its specialised nature, it cannot be assumed that this activity is directly linked to a general increase in the local population, in the same way as dog-walking.

Given the relatively small number of Monmouthshire residents that visit the approximate area around the SAC, the existing access controls (e.g. locked gates) of the most important roost and hibernation caves and the wider regulation of caving activities, it is considered that the implementation of the Monmouthshire RLDP would not result in adverse effects on the integrity of the caves in the Usk Bat Sites SAC, both alone and in-combination.

The residential growth outlined in the Monmouthshire RLDP might also result in additional recreational pressure on various sensitive habitat elements of the Usk Bat Sites SAC. Notably, European dry heath elements are likely to be negatively impacted by off-trail trampling damage. Undoubtedly, any potential negative effects of recreation related to the physical modification of habitats, are likely to be linked to the amount of visitor footfall and the maintenance of the available path network. The Usk Bat Sites SAC lies within easy walking distance (c.1km) of only a small number of dwellings in Monmouthshire. Car-based visitors will of course visit sites further afield but scrutiny of the small number of public roads that provide access into the SAC's component sites indicates that they are generally narrow, and parking is very limited, which will inherently control the number of casual visitors. The site will therefore not be a destination for mass recreational visits arising from Monmouthshire.

Consulting the results of the BBNP visitor survey, most visitors find that the NP is well managed (92% agree) and that information about the NP is easy to find before a visit (81% agree). This is important because it demonstrates the general access conditions in the NP and how easy it is for people to plan their visits, which crucially includes the planning of hiking or exercising routes. Furthermore, 'conditions of upland paths' (rated highly by 52%), 'conditions of lowland paths' (49%) and 'signage' (36%) were all features that were rated highly by interviewees. These results appear to indicate that the path network in the NP is well managed / maintained. This is important because having a variety of well-maintained paths to choose from, encourages visitors to stay on paths and reduces off-path trampling damage.

The potential adverse effects of recreational climbing in the SAC are appropriately addressed in the Core Management Plan of the site. This highlights that climbing in the management units 1 and 2 of the Mynydd Llangatwg SSSI, a component of the Usk Bat Sites SAC, requires the issue of a permit. Therefore, the number of climbers affecting the sensitive rocky slopes can be relatively easily controlled. Like caving, rock climbing is a niche activity undertaken by relatively few people (compared to mainstream activities such as walking and dog walking). This is reflected in the BBNP visitor questionnaire, where rock climbing was not among the reported recreational activities. The overall increase in the number of climbers as a result of the Monmouthshire RLDP is therefore

[129] http://mlcmac.org/llangtwg.htm [Accessed on the 27/08/2019]
[130] http://www.breconbeacons.org/caves [Accessed on the 27/08/2019]
[131] http://www.ogof.org.uk/ [Accessed on the 27/08/2019]

expected to be limited and is adequately addressed through the permit system that already operates in the SAC.

5.2.3.1 In-Combination Assessment

Authorities adjacent to Monmouthshire, including Powys and Blaenau Gwent (both authorities that encompass components of the Usk Bat Sites SAC), would have also had to undertake HRA of their proposed Plans prior to adoption. For example, the Powys Deposit Plan HRA Screening Report concludes that there is no linking impact pathway between development in the Plan and the SAC, and the site therefore can be screened out. Furthermore, the HRA of the previous Blaenau Gwent LDP did not conclude adverse impacts on the Usk Bat Sites SAC regarding recreational pressure. Given the relatively small additional number of visitors likely arising from the Monmouthshire RLDP, it is considered that the implementation of the Monmouthshire RLDP would not result in adverse effects on the integrity of habitats in the Usk Bat Sites SAC, in-combination with development Plans in surrounding authorities.

5.2.4 River Usk SAC

The River Usk SAC is a freshwater system that is designated for its plain to montane water course, several anadromous fish species and otter. The source of the River Usk SAC lies in upland Wales and it then flows in a south-easterly direction, entering Monmouthshire to the west of Abergavenny. The SAC then runs south through the authority before entering the Severn Estuary.

As highlighted in the LSEs screening section, the Core Management Plan for the SAC highlights that recreational pressure is a potential threat to the interest features of the site. For example, both twaite and allis shad are under pressure from recreational anglers, which sometimes take large numbers of these species. Rod fishing is also a potential concern for some of the other qualifying fish species, such as Atlantic salmon. There are several other mechanisms through which SAC features might be impacted, including disturbance of otters by dog walkers, the cutting of water crowfoot beds for boat navigation and effects on the riverine system by canoeists (e.g. disturbance of gravel beds that are used for spawning by the qualifying fish). Given that the Monmouthshire RLDP allocates additional residential housing, there is a clear impact pathway potentially linking to this riverine SAC.

The Monmouthshire RLDP allocates new residential housing within three PSSAs not all of which will be equally relevant to the River Usk SAC. In relation to the River Usk SAC, the PSSA in Abergavenny is most relevant, the outskirts of the town lying only approx. 100m from the SAC. Further individual sites in the vicinity of the SAC may be allocated in the Deposit Plan. Overall, this increase in the local population might lead to more people visiting local greenspaces, including the river. Therefore, this HRA assesses suitable access points to and paths adjoining the SAC, which might facilitate an increase in visitor numbers.

The Ordnance Survey Map on ViewRanger was consulted to investigate the path access network to the Usk around Abergavenny. The map indicates that there are Public Right of Ways (PRoWs) on both sides of the river leading from the Llanfoist bridge approx. 2.8 miles upstream to Glangrwyney. South of Abergavenny, there is no PRoW along the river for several kilometres until Llanellen. Notably, near Llanellen, the Usk Valley Walk (an advertised long-distance hiking route) tracks the river until Llantrisant in southern Monmouthshire. The Usk Valley Walk is an 80km long-distance hiking trail from Brecon to Caerleon (Newport), which is widely advertised online and social media platforms (e.g. [132]). Regarding canoeing, the primary river access point is the Brecon Promenade a long distance upstream from Abergavenny where recreationists can launch their own canoes or rent one. However, in practice canoes can be launched from various other points along the bank of the SAC. Overall, given that the site is easily accessible to various forms of recreation, including hiking, canoeing and fishing, it is likely that the Monmouthshire RLDP would result in an increase in recreational pressure within the SAC. However, it is to be noted that several mechanisms are already in place, which buffer adverse recreational impacts within the site.

Overall, it is considered that adverse disturbance impacts on otter from dog walkers and other recreational activities are very unlikely to arise. Otter are nocturnal animals and therefore predominantly active when recreational activities typically are not taking place. Furthermore, otter show high adaptive resilience towards disturbance, illustrated by the presence of breeding sites in

[132] https://www.ldwa.org.uk/ldp/members/show_path.php?path_name=Usk+Valley+Walk [Accessed on the 01/11/2019]

highly disturbed conurbations (e.g. Glasgow)[133]. They are likely to be most sensitive when being disturbed in their holts or resting on couches. A typical response of radio-tracked otters to anglers and dog walkers is to move to a position where they can see the disturbance stimulus, followed by a 50m dive and resting on a riverbank for 30 minutes[134]. Overall, it is concluded that the overall health of otter populations is not adversely impacted by human disturbance. In the context of disturbance to otter, it should also be noted that for adverse impacts to arise, pathways should be 'real' rather than 'hypothetical'. There is no hard evidence that recreation in the River Usk SAC is negatively impacting its qualifying otter population.

For example, canoeing access in specific stretches of the River Usk SAC is subject to voluntary access arrangements by the Wye and Usk Foundation[135]. The advice set out by this organisation stipulates that canoeing and kayaking should only be undertaken freely in winter, when the rivers are in spate flow. The Foundation gives clear guidance on where paddling is permitted and has live webcams that show the rivers' water levels. Restricting boating activities to the winter ensures that damage to the qualifying species and habitat is minimised. For example, it is less likely that canoeists will disturb gravel bars in high water flows and paddling in winter also protects the spawning period, when the anadromous fish are most sensitive. The Bannau Brycheiniog National Park website, which promotes canoeing in the River Usk SAC, advises all users to follow both the Countryside Code[136] and the Waterways Code[137]. These Codes of Conduct are designed to raise public awareness to reduce disturbance and pollution of the countryside.

Regarding recreational fishing, catch and release is now promoted by Natural Resources Wales as an angling technique to aid the conservation of fish stocks. Furthermore, any Atlantic salmon that is caught before the 16th of June must be returned to the river[138]. There are also rod fishing byelaws in place for Wales, detailing the open seasons for a range of fish species, which are designed to protect the integrity of qualifying fish populations.

While canoeing and fishing are popular in the River Usk SAC, these activities should be set into context of the number of people undertaking other recreational activities. While canoeing and fishing can result in damaging effects, they are undertaken by a small percentage of the population. For example, only approx. 1.5% of the UK population engage in recreational fishing[139], which is exceedingly small compared to more popular recreational activities such as dog walking. Therefore, of the new residents arising from the RLDP, only a small fraction would add to the number of canoeists and fishers along the river corridor. Consequently, a direct link between the delivery of new housing in an area and a significant increase in the number of people that will engage in fishing or canoeing cannot be drawn. Furthermore, the qualifying species are considered to be at relatively low risk of negative impacts from a general increase in the surrounding population. While an increase in river recreation infrastructure (e.g. further boat moorings) may pose a threat to the ***Ranunculus*** vegetation, this is not an automatic consequence of the Monmouthshire RLDP.

Overall, given that only a very small portion of new residents are expected to undertake activities that would threaten the integrity of the riverine SAC, and the fact there are current regulatory measures of these activities in place, it is concluded that there will be no adverse effects of the Monmouthshire RLDP alone on the site integrity of the River Usk SAC. Moreover, there is currently a motion towards introducing new, more protective catch controls for some of the qualifying fish species in these SACs. For example, the River Usk SAC's Core Management Plan highlights that exploitation of shad is currently unregulated and that a cessation of fishing activity might become necessary near known spawning grounds. Controls on shad catches are currently being considered in the review of freshwater fisheries legislation. Furthermore, Natural Resources Wales is applying for more protective catch controls on Atlantic salmon, which are being reviewed by the Welsh Government.

[133] Chanin P. (2003). Ecology of the European otter. ***Conserving Natura 2000 Rivers Ecology Series No.10.*** English Nature, Peterborough. 68pp.
[134] Durbin L.S. (1993). ***Food and habitat utilisation of otters (Lutra lutra) in a riparian habitat – the River Don in north-east Scotland.*** Unpublished PhD thesis, University of Aberdeen.
[135] https://www.wyeuskfoundation.org/ [Accessed on the 01/11/2019]
[136] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/701188/countryside-code.pdf [Accessed on the 01/11/2019]
[137] http://www.britishwaterways.co.uk/media/documents/publications/Waterways_Code_Leaflet.pdf [Accessed on the 01/11/2019]
[138] https://naturalresources.wales/days-out/things-to-do/fishing/?lang=en [Accessed on the 01/11/2019]
[139] approximately 1 million fishing licences are sold annually in the UK, equating to approximately 1.5% of the UK population; even assuming that an equal number of people regularly fish without licences that still equates to only 3% of the population

5.2.4.1 In-Combination Assessment

Authorities adjacent to Monmouthshire, including the Bannau Brycheiniog National Park, Newport (closest to the River Usk SAC), Forest of Dean, Hereford, South Gloucestershire and Bristol, also undertook HRAs of their proposed Plans prior to adoption. Given the relatively small additional number of residents undertaking canoeing and fishing that are likely to arise from the Monmouthshire RLDP, it is considered that the implementation of the plan is unlikely to result in adverse effects on the integrity of the River Usk SAC in-combination.

5.2.5 River Wye SAC

The River Wye SAC is a freshwater system that is designated for its plain to montane water course, various anadromous fish species and otter. It rises in the Welsh mountains (at Plynlimon), from where it runs in an easterly direction, before turning in a southerly direction, straddling the English-Welsh border and entering the Severn Estuary near Chepstow.

The Core Management Plan for the River Wye SAC indicates that some qualifying features of the site are sensitive to recreational impacts. For example, it states that '***anglers occasionally fish for shad, and they are sometimes taken in quite large numbers. Further research is necessary to define sustainable levels of angling. If this shows there is cause for concern a temporary cessation of fishing activity in the vicinity of known spawning grounds during the spawning period should be considered, particularly where shad are known to be taken regularly. Exploitation of shad is currently unregulated…***' Rod fisheries are a potential concern for Atlantic salmon, but this is regulated by EA licensing and byelaws by defining the fishing season and permissible methods of catching. As highlighted in the section on the River Usk SAC, the designated features may be impacted by a range of other pathways, such as the cutting of aquatic vegetation for navigational purposes, disturbance of spawning gravels by canoeists and disturbance to otter by dog walkers.

The Monmouthshire RLDP allocates new residential housing in three PSSAs, not all of which will be equally relevant to the River Wye SAC. For example, potential new residents in the PSSA of Chepstow, which are interested in visiting a river for recreation, are likely to visit the River Wye SAC, which is only a short travel distance from home. Further individual sites in proximity of the River Wye SAC may be allocated in the Deposit Plan. Overall, this increase in the local population might lead to more people visiting local greenspaces, including the river. Therefore, this HRA assesses suitable access points to and paths adjoining the SAC, which might facilitate an increase in visitor numbers.

Ordnance Survey Maps show that the River Wye SAC is very accessible to recreationists. There is a PRoW, the Wye Valley Walk, straddling both sides of the banks of the River Wye in the area of Monmouth. Upstream of central Monmouth, the path lies on the western side of the river with no footpath on its eastern side. At the Wye Bridge, the Wye Valley Walk traverses to the eastern side of the river, from where it follows the meandering river downstream all the way to Chepstow. Access to the River Wye SAC by Chepstow residents is likely to be less of an issue, because the SAC is less accessible near its confluence with the Severn Estuary. The available evidence indicates that canoeing is a highly popular activity on the River Wye. For example, a google search for 'canoeing the Wye Valley' brings up 279,000 results and five different companies that offer canoeing activities. In Monmouth there is a facility for canoe hiring just north of the Wye Bridge, which is accessible to new Monmouthshire residents that are interested in canoeing. As is the case for the River Usk SAC, while most canoeists might launch from the main canoeing hubs, canoes can be launched from many other locations on the banks of the Wye. Overall, there is clearly a potential of the Monmouthshire RLDP to result in disturbance to the qualifying features of the River Wye SAC.

Regarding the River Wye SAC otter population, it is concluded that there will be no adverse disturbance impacts of the RLDP. This is because otters are relatively tolerant of human presence (see discussion of this in the section on the River Usk SAC) and there is no current evidence that recreation along the River Wye is negatively impacting its qualifying otter population.

There are several existing mechanisms in place that will reduce the potential impacts of recreational pressure on the SAC features. As highlighted previously, the Wye and Usk Foundation oversees voluntary access codes along the R. Wye, including advice on when paddling activities are advised (e.g. in winter under spate flows). The R. Wye is navigable, with the Environment Agency (EA) or Natural Resources Wales being responsible for non-tidal navigation (mainly canoeing and rowing) to

Bigweir Bridge. Gloucester Harbour Trustees are the navigation authority for the tidal section of the river south of Bigweir Bridge, although this section is less relevant for recreation. The EA has published a River Wye Code of Conduct[140], which stipulates that waterweed and gravel beds should not be disturbed. Furthermore, '***it is an offence to willfully disturb breeding fish or spawning beds.***' The guidance also identifies that trampling and launching on spawning gravels used by salmon and trout between October and April should be avoided. Furthermore, the EA canoeists' guide to the River Wye[141] provides detailed information on the nature conservation features of the site and sets out good practice guidelines to follow. It addresses qualifying features of the SAC, such as migratory allis and twaite shad. For example, disturbance of fast-flowing gravel areas of the river must be avoided. Ignoring the advice set out in the guide could lead to a criminal offence being committed and enforcement action to be taken. The Forest of Dean and Wye Valley tourism website also promotes a Code of Conduct for canoeists[142], which includes avoiding damage to beds of waterweed and disturbance of nesting birds along the riverbanks.

Measures are also in place to protect the qualifying fish populations from recreational angling. For example, catch and release is now promoted by Natural Resources Wales as an angling technique to aid the conservation of fish stocks. Furthermore, any Atlantic salmon that is caught before the 16th of June must be returned to the river[143]. There are also rod fishing byelaws in place for Wales, detailing the open seasons for a range of fish species, which are designed to protect the integrity of qualifying fish populations.

Canoeing and fishing in the River Wye SAC are certainly popular activities, drawing visitors from across the country. However, these activities are only undertaken by a small percentage of the population (e.g. only 1.5% of the UK population engages in recreational fishing). Furthermore, these activities are much less relatable to Local Plan growth than more frequently undertaken activities such as dog walking, walking and cycling (which often have very small core recreational catchments). A direct link between residential growth proposed in the RLDP and a significant increase in the number of canoeists and anglers cannot be drawn.

Overall, given that only a very small portion of new residents are expected to undertake activities that would threaten the integrity of the River Wye SAC and there are current regulatory measures of these activities in place through the Environment Agency and Natural Resources Wales, it is concluded that there will be no adverse effects of the Monmouthshire RLDP alone on the site integrity of the SAC.

5.2.5.1 In-Combination Assessment

Authorities adjacent to Monmouthshire, including the Bannau Brycheiniog National Park, Newport, Forest of Dean, Hereford, South Gloucestershire and Bristol, also undertook HRAs of their proposed Plans prior to adoption. For example, the HRA of the adopted Herefordshire Core Strategy concluded that there would be no adverse effects of the plan on the River Wye SAC in relation to recreational pressure. Given the relatively small additional number of residents undertaking canoeing and fishing that are likely to arise from the Monmouthshire RLDP, it is considered that the implementation of the plan is unlikely to result in adverse effects on the integrity of the River Wye SAC in-combination.

5.2.6 Sugar Loaf Woodlands SAC

The Sugar Loaf Woodlands SAC is a composite site that encompasses three distinct areas, The Park, St Mary's Vale and The Deri. Approx. 70% of the site is covered by woodland with mature sessile oaks dominating the canopy layer. The underlying ground flora comprises native plants such as hazel, holly, common bent, wavy-hair grass, creeping soft-grass, wood sorrel, heath bedstraw and bracken. As highlighted in the background chapter, an increase in recreational pressure (particularly when people venture off-path) may lead to increased soil compaction around the sensitive root systems of ancient trees. Furthermore, trampling could lead to direct damage to tree roots and the surrounding ground flora. The emerging Monmouthshire RLDP makes provision for approximately 5,400 – 6,210 new homes, of which at least some will be delivered in the Abergavenny PSSA within potential walking distance of the SAC. Recreational pressure could especially arise in-combination with the

[140] Available at: https://www.gov.uk/guidance/river-wye-conditions-closures-and-restrictions [Accessed on the 28/10/2022]
[141] Environment Agency. (2011). Why canoe? Canoeists' guide to the River Wye. 63pp. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/301603/gemi1011bujd-e-e.pdf [Accessed on the 28/10/2022]
[142] http://www.wyedeantourism.co.uk/canoe_conduct [Accessed on the 05/11/2019]
[143] https://naturalresources.wales/days-out/things-to-do/fishing/?lang=en [Accessed on the 01/11/2019]

adopted Bannau Brycheiniog National Park (BBNP) LDP, which allocates 1,990 dwellings. The area covered by the BBNP LDP adjoins Monmouthshire and the provision of housing in Crickhowell would place new residents within easy travel distance of the SAC.

The area encompassing the Sugar Loaf Woodlands SAC is managed by the National Trust. The Sugar Loaf mountain is a very popular recreation destination. The community app outdooractive shows that 40 visitor routes (varying in length from 0.9 to 32.5 miles) have been mapped within and near the SAC woodland parcels. Furthermore, the National Trust (NT) website advertises the Sugar Loaf circuit walking trail, which starts in the town centre of Abergavenny, leads through SAC woodland, Sugar Loaf summit and back to Abergavenny. The NT describes the mountain as an '***iconic peak***', offering wildlife adventures and '***glorious panoramic views'*** over the surrounding countryside.

Despite being a highly rated recreation area, the integrity of the Sugar Loaf Woodlands SAC is unlikely to be at significant risk from housing proposed in the Monmouthshire RLDP. Several well-established tracks cut through the three component parts of the SAC. These paths would avoid the most sensitive parts of the site (e.g. roots of mature trees) and are maintained in good condition by the NT. Given that a suitable path network is in place, there is little incentive for visitors to walk off-track. The steep terrain of the woodland also discourages off-track activities (which are most damaging to sensitive habitat features) and the creation of new desire lines. Overall, given that the steep gradient of the SAC restricts visitor activities to the main paths and the site is under appropriate management by the NT, it is concluded that the Monmouthshire RLDP will not lead to adverse effects on site integrity regarding recreational pressure in-combination. No policy recommendations are made in relation to this impact pathway.

5.2.6.1 In-Combination Assessment

Authorities adjacent to Monmouthshire, including the Bannau Brycheiniog National Park (most relevant to the Sugar Loaf Woodlands SAC), Powys (most relevant to the River Usk SAC), Herefordshire and Forest of Dean (the latter two being most relevant to the River Wye SAC), have undertaken their own HRAs in relation to European sites, both alone and in-combination. For example, the Powys Deposit Plan HRA Screening Report concludes that there is no linking impact pathway between development in the Plan and the River Usk SAC, the site therefore being screened out from Appropriate Assessment. The HRA of the previous Blaenau Gwent LDP determined that there were no adverse impacts on the River Wye SAC regarding recreational pressure. It is therefore concluded that the implementation of the Monmouthshire RLDP would not result in adverse effects on the integrity of these SACs, in-combination with development Plans in surrounding authorities.

5.2.7 Wye Valley Woodlands SAC

The Wye Valley Woodlands SAC is designated for several woodland habitats, including ***Asperulo-Fagetum*** beech forest, ***Tilio-Acerion*** forest of slopes, screes and ravines and ***Taxus baccata*** woods. These habitats are not generally considered to be highly sensitive to recreational pressure due to the difficult topography, but the segments of ancient forest within the SAC are potentially more vulnerable. It is well known that the condition in the soil surrounding mature trees affects their roots, mycorrhizal fungi, nutrient uptake and growth rate. Recreational activities might lead to compacted soil with less space for air and water, both essential for plant growth, and could negatively impact trees in the SAC. However, walking routes in the general area of the Wye Valley Woodlands SAC appear to be well publicised, waymarked and used by the public (e.g. near Beacon View, Monmouth[144]).

The woodland walks maintained by Natural Resources Wales (or by Natural England within SAC components in England) would have considered ecological interest features (e.g. ancient trees) and their use by the public is not considered to negatively impact the qualifying habitats of the SAC. It was, however, anecdotally noted by Natural Resources Wales in comments on the Preferred Strategy HRA that damage had been caused to the SAC by walking, mountain biking and rock climbing activities. A review of the contours on Ordnance Survey Maps indicates that most of the SAC's woodland components are very steep and that visitors are therefore likely to stick to the paths provided, which would further protect the site's interest features. The lesser horseshoe bats, Annex II qualifying species

[144] https://naturalresources.wales/days-out/places-to-visit/south-east-wales/beacon-view/?lang=en [Accessed on the 09/08/2024]

of the SAC, are highly sensitive to recreation, but access to the component sites of the SAC that act as maternity roosts or hibernacula is regulated by grills.

To further investigate potential impacts on Wye Valley Woodlands SAC a visitor survey was undertaken for the Monmouthshire Replacement Local Plan in 2023. The results are discussed in detail in Appendix E. The home postcodes of interviewees provide the key parameter that is used to identify recreational catchments. Typically, the 75th percentile of interviewees (i.e. the distance from the SAC from which 75% of interviewees originate) is used to denote the core recreational catchment. This cut-off point is used to remove the influence of outliers and to demark the catchment that forms the most likely visitor pool.

Using these data, the 75th percentile of all visitors that travelled to the SAC is 39.3km. In other words, three quarters of visitors live within 39.3km of the SAC boundary. This is a very large catchment and represents the importance of the SAC in drawing visitors from long distances. For example, visitors come from as far afield as Lincolnshire, Sheffield, Devon, Hampshire and Nottinghamshire, and visitors from outside Monmouthshire and Wales, make up a large proportion of the survey pool. Even excluding people on holiday to focus entirely on people 'visiting from home' still leaves a relatively large catchment of 24km. This indicates that the Wye Valley Woodlands SAC has a regional, not to say national, draw rather than a local one. In contrast, during surveys of the Severn Estuary SPA/Ramsar/SAC, 75% of visitors lived within 6.5km of the site, indicating the much greater proportion of local residents in the visitor pool. The core recreational catchment for the Wye Valley Woodlands SAC for residents of Monmouthshire (i.e. the zone within which 75% of Monmouthshire-resident visitors are found) is 7km, but it is important to remember that Monmouthshire residents make up a minority of visitors, with 71% of visitors living in other local authorities.

The data from the visitor survey strongly suggest that:

- The visitor pressure in the Wye Valley Woodlands SAC is relatively low compared to other European sites. This is relevant given that, like most sites designated for their habitats, the SAC is more resilient to recreational pressure than a site harbouring easily disturbed/displaced interest features such as Severn Estuary SPA/Ramsar.
- The visitor profile is dominated by residents of other local authorities, some very far afield, who visit site infrequently (51% of survey respondents), possibly even just once given the high percentage who are on their first visit, but who stay on site for a considerable time (3-4 hours or more).
- A total of 71% of visitors derive from local authorities other than Monmouthshire, with only 29% of visitors being Monmouthshire residents.
- This visitor profile influences the core recreational catchment, yielding a very large core catchment of 39km. Even excluding holidaymakers, the SAC still has a large core catchment of 25km, indicating that some people travel a considerable distance from home to visit Wye Valley Woodlands SAC. For example, five visitors had travelled over 30km from home to visit the SAC, including one person from Swindon, located more than 60km away.
- The large distances travelled to visit the SAC do not apply to residents of Monmouthshire, who travel an average distance of 3km to visit the SAC, with 75% of Monmouthshire-based visitors living within 7km.

Given these data it is considered that visitor pressure within the SAC is limited, is a regional or national issue, and will not be heavily affected by housing and population growth within Monmouthshire. As such, no mitigation strategy for the Local Plan is required and a conclusion of no adverse effect on integrity is reached. The foregoing assessment inherently takes account of growth in Monmouthshire in combination with growth elsewhere in the recreational catchment of the SAC.

5.3 Loss of Functionally Linked Land

5.3.1 Usk Bat Sites SAC & Wye Valley and Forest of Dean Bat Sites SAC

Given that both SACs are designated for similar species and that the impact mechanisms relating to the Monmouthshire LP are the same, the Appropriate Assessment of the two sites is combined in the following. The concept of functionally linked land addresses that mobile qualifying species, such as the lesser horseshoe bat (qualifying species of both the Usk Bat Sites SAC and the Wye Valley and Forest of Dean SAC) and the greater horseshoe bat (qualifying species of the latter SAC only), are not only dependent on the designated European sites, but also on habitat features (e.g. commuting corridors, foraging sites) that are not part of the formal site designation. The highly mobile nature of bats implies that areas of habitat of crucial importance to the maintenance of their populations, for example linear features such as hedgerows that are used as flightlines, are located outside the physical limits of Habitats Sites.

The same also applies to suitable foraging habitat and loss of seasonal roosts. These can be affected directly by removal, or effectively rendered unsuitable by inappropriate lighting. Such functionally linked land is considered to be important for maintaining the integrity of bat populations within SACs. Both SACs lie partly within Monmouthshire and the LP might therefore result in land parcels that are functionally linked to these European sites. The Usk Bat Sites SAC is located partly within the north-western section of Monmouthshire and The Wye Valley and Forest of Dean Bat Sites SAC comprises several component parts in the eastern section of Monmouthshire.

To assess the impact pathway loss of functionally linked land, an assessment of the behaviour and habitat requirements of bats is required in the first instance. Most bats are likely to use natural linear landscape features (e.g. hedges and treelines) to navigate and open areas of grassland for foraging. Therefore, it is generally the allocation of greenfield sites for development, which is expected to have the largest impact on lesser and greater horseshoe bat populations. Developing greenfield sites is likely to mean that such features are lost, (or effectively loss such as through inappropriate lighting) resulting in the loss of functionally linked land parcels. Conversely, redeveloping existing brownfield sites is likely to be less damaging because these are generally presumed to have a lower ecological value to the bats. However, it is to be noted that bats also use man-made habitat features to roost and / or navigate. Therefore, even the conversion of a brownfield site could mean that functionally linked land is lost. The Monmouthshire LP currently allocates primarily greenfield sites, which are likely to be most suitable as functionally linked land.

The linear landscape features and grassland used by bats for navigating, commuting and foraging provide an adequate starting point for an assessment of functionally linked land. Review of online satellite imagery indicates that there are various areas with suitable bat off-site supporting habitat in the vicinity of new development. The following provides a brief overview of some of these. For example, the area to the north of the A465 (Heads of the Valley Road) and the south of the settlement of Clydach, comprises open habitat with streams, treelines and semi-improved grassland; and this habitat might be used by lesser horseshoe bats stemming from the nearby Usk Bat Sites SAC. Furthermore, two component parcels of the Wye Valley and Forest of Dean Bat Sites SAC lie relatively close to the development around Monmouth. The Newton Court Stable Block, SSSI component of the SAC, is in an area of tree- and hedge-lined fields, adjacent to Mally Brook and the River Wye. Given that the designation here only covers the stables, it is certain that the bats will be using some of these habitat features, which are not part of the designation. Equally, the Wye Valley Lesser Horseshoe Bat Site (another SSSI component) also lies adjacent to fields with linear habitat features and the River Wye. The lesser horseshoe bats are likely to utilise some of these features for commuting and / or foraging.

Further scientific evidence relating to the use of functionally linked land is provided by the Bat Conservation Trust's Core Sustenance Zones (CSZs)[145], within which habitat preservation will have a significant influence on the conservation status of a bat species. The CSZs are calculated by

[145] Research published by the Bat Conservation Trust. 2016. Core Sustenance Zones: Determining zone size. Available at: https://cdn.bats.org.uk/pdf/Resources/Core_Sustenance_Zones_Explained_04.02.16.pdf?mtime=20190219173135 [Accessed on the 04/11/2019]

averaging the mean-maximum foraging radii across all studies reporting this metric, weighted by the number of bats tracked in the study. The weighted average is then rounded to the nearest kilometre to reflect the level of precision in the bat tracking. According to the Trust, lesser horseshoe bats have a CSZ of 2km, while greater horseshoe bats have a CSZ of 3km. Given the scientific knowledge on CSZs, this impact pathway will only have to be reassessed further, if development is allocated within a 2km buffer zone of the Usk Bat Sites SAC and / or within a 3km buffer zone of the Wye Valley and Forest of Dean Bat Sites SAC. Any development sites within these buffers will require further assessment regarding their suitability for and usage by the lesser and greater horseshoe bat.

Note that the use of a 2km and 3km CSZ for the bat SACs in this assessment does not mean that bats from these SACs will not travel more widely across the countryside. Rather, it is intended to identify those allocations where the risk of an adverse effect on SAC bats is particularly high (in the absence of detailed mitigation) given the presence of suitable habitat. Since lesser and greater horseshoe bats are legally protected species wherever they roost, and thus material considerations in the planning process, any site identified to be used by these species of bat will require further assessment and potentially mitigation for any planning application, irrespective of distance from these SACs.

No sites have been allocated by the local plan within the CSZ of Usk Bat Sites SAC. Table 7 details the sites that have been allocated within the CSZ of the Wye Valley and Forest of Dean Bat Sites SAC.

Table 7. Local Plan Allocations within 3km of Wye Valley and Forest of Dean Bat Sites SAC

Policy	Settlement	Site_Name	Units	areaha
HA8	Monmouth	Land at Tudor Road, Wyesham, Monmouth	50	2.1
EA1b	Monmouth	Poultry Units, Rockfield Road, Monmouth	N/A	1.3
HA4	Monmouth	Land at Leasbrook, Monmouth	270	11
HA13	St Arvans	Land adjacent to Piercefield Public House, St Arvans	16	1.1
HA18	Shirenewton	Land west of Redd Landes, Shirenewton	26	1.76

With the exception of the existing poultry units at Monmouth, which are industrial agricultural, and the existing industrial/employment sites in Chepstow, these appear to be greenfield sites and potentially of use to SAC bats. Moreover, there was a lesser horseshoe roost at the poultry units identified during surveys for a planning application (DM/2018/02026) for the site confirming that this site is used by bats potentially linked to the SAC.

It is recommended that the following text (or similar) is inserted into a suitable policy in the next iteration of the LP: ***'To meet the requirements of the Habitats Directive regarding allocated greenfield sites within the Core Sustenance Zones (CSZs) of the Usk Bat Sites SAC and the Wye Valley and Forest of Dean Bat Sites SAC, the applicant is required to provide evidence that the development will not result in adverse effects on site integrity. To achieve this, a habitat assessment will have to be undertaken by a suitably qualified professional. Where habitats are suitable, a suite of bat surveys (e.g. bat activity surveys, roost emergence surveys) will need to be undertaken between April and September. Where a land parcel is demonstrably used by SAC bats, mitigation and avoidance measures might be required, and the planning application will likely need to be assessed through a project-level Habitats Regulations Assessment and will need to consider matters such as habitat connectivity, foraging value and minimised lighting'***.

This would not only apply to development that is specifically allocated within the Local Plan but would also apply to development that would come forward for planning consent (including the potential solar

farm identified in Policy CC2) but is not specifically allocated, such as renewable energy development (wind turbines if such were to come forward in response to Policy CC3).

With regard to this recommendation Monmouthshire Council expressed concern as to whether the extent of the suggested wording is needed as it is too prescriptive. Instead, the Deposit Plan addresses these recommendations by providing less prescriptive form of wording in Policy NR1 – Nature Recovery and Geodiversity and its supporting text in paragraphs 11.10.2 – 11.10.8 under the heading International/National (Statutory) Sites and Protected Sites and Species with specific reference to Functionally Linked Land in paragraph 11.10.5, but without providing specific details of the need for bat surveys, survey seasons and the potential need for mitigation . Policy LC5 – Dark Skies and Lighting, offers further policy requirements in relation to external lighting and potential impacts on biodiversity and ecology. Strategic Policy S8 – Site Allocation Placemaking Principles also covers dark corridors as well as requirements in the site-specific allocation policies where relevant, for example Policy HA4 – Land at Leasbrook, Monmouth. Further specific requirements can be set out in Supplementary Planning Guidance.

The recommendation was made to provide guidance to developers over the specific issue and investigations that would need to undertake. However, it is recognised that the inclusion of further details in guidance such as Supplementary Planning Guidance or by reference to this HRA report would provide advice to developers regarding the steps needed to investigate this specific issue of functionally-linked land for bats, without being too specific in policy, given that functionally linked land is a consideration for other European sites such as Severn Estuary SPA/Ramsar, and bat surveys at periods other than April to September may sometimes be required. It is therefore considered that the policy in the Local Plan does provide a sufficient policy framework to ensure no adverse effects on the integrity of European sites will arise.

5.3.1.1 In-Combination Assessment

Authorities adjacent to Monmouthshire, including Powys and Blaenau Gwent (both authorities that encompass components of the Usk Bat Sites SAC) and Forest of Dean (containing components of Wye Valley & Forest of Dean Bat Sites SAC) also have potential to impact functionally linked land associated with the SAC using the same Core Sustenance Zones as in this HRA. However, given the implementation of the recommendations in the preceding section it is considered that the implementation of the Monmouthshire RLDP would not result in adverse effects on the integrity of the Usk Bat Sites SAC or Wye Valley & Forest of Dean Bat Sites SAC, in-combination with development Plans in surrounding authorities.

5.3.2 Severn Estuary SPA / Ramsar

Generally, it is to be noted that the Severn Estuary SPA / Ramsar covers most of the habitat that is used by its qualifying bird species, including the wet coastal grazing marsh, improved grassland and open standing water. However, some of its more mobile waterfowl and wader species, most notably the Bewick's swan and the white-fronted goose, might be expected to move the longest distance beyond the site boundary. The Natural England Advice Note[146] identifies that '***some species will also use areas of land and coastal waters outside the boundaries of both the European Marine Site, SPA and Ramsar site. Relevant authorities need to have regard to such adjacent interests, as they might be affected by activities taking place within, or adjacent to the European Marine Site.***' Effectively, this statement highlights that regarding the Severn Estuary SPA / Ramsar, due consideration must be given to the loss of functionally linked land.

Bewick's swans feed on several species of soft meadow grasses, including ***Agrostis stolonifera*** and ***Alopecurus geniculatus*** that are component species of wet meadows. Some of such habitat features might be located outside the European site. The distance travelled to foraging grounds beyond the boundary of the SPA / Ramsar is likely to depend on the time of year, resource conditions within the SPA / Ramsar and interspecific competition. Due to a combination of these factors, Bewick's swans

[146] Published by Natural Resources Wales and Natural England. Available at: https://naturalresources.wales/media/673887/severn-estuary-sac-spa-and-ramsar-reg-33-advice-from-ne-and-ccw-june-09.pdf [Accessed on the 05/11/2019]

partially forage in fields at relatively great distances from their roosting locations. A study in the Netherlands determined that Bewick's swans foraged in arable fields 7.1km away from their roosts[147].

A review of satellite imagery of the growth area of Severnside, shows an extensive network of drainage ditches to the north of the SPA / Ramsar, in proximity to the M4 motorway. The land around Chepstow also comprises a combination of wet grassland and arable fields, with the potential to act as supporting habitat to the SPA / Ramsar. However, given that the distance to the SPA / Ramsar is further, a potential for the M48 to act as a barrier and the more built-up nature of the wider area, its general suitability is considered to be slightly lower than the Severnside area. It is less likely that birds from the SPA's / Ramsar's intertidal zones would traverse the motorways and the River Wye to settle on fields around Chepstow. In other areas (e.g. Merseyside) SPA birds travel considerable distances inland to roost or feed, but that is most likely because the immediate coastal zone is heavily urbanised. Given that southern Monmouthshire is less built up, it is expected that the birds will fly the shortest possible distance to find suitable feeding grounds. However, in the absence of bird monitoring data for the arable fields in question, it remains a possibility that the birds are using greenfield sites in the vicinity of Chepstow.

The Severn Estuary SPA/Ramsar is designated for its large population of waterfowl and waders generally, and for its specific populations of non-breeding Bewick's swan, white-fronted goose, dunlin, redshank, shelduck, gadwall, ringed plover, curlew and pintail. To aid consideration of functionally-linked land issues Natural England has produced unpublished guidance (there is no Natural Resources Wales equivalent). This guidance groups birds by their maximum foraging distance. According to this guidance most waterfowl and waders remain within 2km of their core roost areas (i.e. the SPA/Ramsar site) when foraging. Of those species for which Severn Estuary SPA/Ramsar is designated the exceptions are Bewick's swan and white-fronted goose which forage up to 10km from their core roost sites. The same Natural England guidance considers that residential development could have an adverse effect on these two species if it resulted in loss of functionally-linked land up to 5km from the core roost areas (the SPA/Ramsar).

The following sites in Table 9 were identified as being of sufficient size and proximity to the SPA and Ramsar to be utilised by SPA birds.

Table 8. Local Plan sites over 2ha and within 5km of Severn Estuary SPA/Ramsar

Policy	Settlement	Site Name	Units	Area ha
HA3	Chepstow	Land at Mounton Road, Chepstow	146	12.8
HA2/EA1m	Severnside	Land to the East of Caldicot	770	64
HA9/EA1l	Severnside	Land at Former MOD land, Caerwent	40	4.2
EA1d/W3c	Chepstow	Newhouse Farm, Chepstow	N/A	2
EA1f/W3d	Magor	Quay Point, Magor	N/A	14
EA1g	Undy	Rockfield Farm, Undy	N/A	3.2
EA1h/W3e	Magor	Gwent Euro Park, Magor	N/A	7
EA1/W3f	Caldicot	Land adjoining Oak Grove Farm, Caldicot	N/A	6

These sites were all identified as greenfield sites, although without further survey the level of suitability is difficult to assess. These are generally the parameters that are used for the identification of potential functionally linked land.

[147] Nolet B.A., Bevan R.M., Klaassen M., Langevoord O. & van der Heijden Y.G.J.T. 2002. Habitat switching by Bewick's swans: Maximisation of average long-term energy gain? Journal of Animal Ecology 71: 979-993.

In addition to the size of the candidate sites and distance of the candidate sites from the Severn Estuary, the Monmouthshire Council ecologists reviewed Preliminary Environmental Appraisals where available and undertook a desk study to determine whether housing sites should be considered (during plan preparation / application preparation) for potential use by overwintering birds. This formed part of the proforma preparation for candidate sites. Of the sites listed in Table 9 many were determined to be unsuitable with the exception of the Caldicot site HA2 due to habitats present, disturbance levels, agricultural practices. This assessment also applies to site EA1/W3f, which has been considered to have potential for overwintering birds. Other sites considered to be suitable are Gwent Europark and Quay Point.

Given that the area north of the SPA / Ramsar contains habitat of sufficient size and several parcels were deemed suitable as functionally-linked land, it was recommended as part of the Preferred Strategy HRA that the following text (or similar) was inserted into an appropriate policy of the Deposit Plan: '***To meet the requirements of the Habitats Directive, the applicant should be required to provide evidence that the development will not result in adverse effects on the integrity of the Severn Estuary SPA / Ramsar regarding its qualifying bird species. To demonstrate this, a survey will be required to determine the habitats and current site use to verify if the land parcel is indeed suitable for supporting a significant population[148] of designated bird species. Where habitats are suitable, non-breeding bird surveys will be required to determine if the site and neighbouring land constitute a significant area of supporting habitat. Bird surveys will need to be undertaken during autumn, winter and spring. If habitat within the site or adjacent land are identified to support significant populations of designated bird species, avoidance measures and mitigation will be required, and the planning application will likely need to be assessed through a project specific Habitats Regulations Assessment to ensure that the development does not result in adverse effects on integrity.***'

With regard to this recommendation, Monmouthshire Council expressed concern as to whether the extent of the suggested wording is needed as it is too prescriptive. Instead, the Deposit Plan addresses these recommendations by providing a less prescriptive form of wording in Policy NR1 – Nature Recovery and Geodiversity and its supporting text in paragraphs 11.10.2 – 11.10.8 under the heading International/National (Statutory) Sites and Protected Sites and Species. Site specific allocation policies also set out policy requirements, such as for Policy HA2 – Land to the East of Caldicot.

The recommendation was made to provide guidance to developers over the specific issue and investigations that would need to undertake. However, it is recognised that the inclusion of further details in development application specific consultations, or by reference to this HRA report, would provide advice to developers regarding the steps needed to investigate this specific issue of functionally-linked land for birds, without being too specific in policy, given that functionally linked land is a consideration for other European sites such as Usk Bat Sites SAC. It is therefore considered that the policy in the Local Plan does provide a sufficient policy framework to ensure no adverse effects on the integrity of European sites will arise.

5.3.2.1 In-Combination Assessment

In addition to growth within Monmouthshire, new dwellings are currently planned within 5km of the SPA and Ramsar site in Cardiff, Torfaen, North Somerset, South Gloucestershire, Bristol, Stroud District, Forest of Dean District, and the Somerset Council area (previously including Sedgemoor, Somerset West & Taunton, and other districts). However, the implementation of the recommendations in the preceding section would address Monmouthshire LDPs contribution to any in combination effect.

5.4 Water Quality

5.4.1 River Usk SAC & River Wye SAC

Due to the similar ecological nature and qualifying features of the River Usk SAC and the River Wye SAC, this section combines the Appropriate Assessment for both sites.

[148] A significant population is classified as a site that regularly used by 1% or more of the population of qualifying bird species

Both SACs are designated for a variety of features that are dependent on water quality. For example, the ***Ranunculion fluitantis*** and ***Callitricho-Batrachion*** vegetation elements are highly dependent on good water quality status. Under high nutrient conditions, the growth of algae and the risk of eutrophication increases. In turn the excessive growth of epiphytic algae is likely to suppress the flowering of aquatic plants. However, unfavourable water quality status will also affect the fish species that the sites are designated for. For example, both sea and brook lampreys require clear, well-oxygenated water for spawning, and eutrophication associated with domestic sewage effluent will reduce their spawning success. Atlantic salmon also need high water quality, particularly high dissolved oxygen levels, for survival. Maintaining the good chemical status within the rivers is therefore integral to protecting their integrity.

The River Usk rises on the northern slopes of the Black Mountain and flows 125km in a south-easterly direction through the towns of Brecon, Crickhowell, Abergavenny and Usk, before discharging into the Severn estuary at Newbridge. The SAC comprises a long narrow catchment, partly owed to the surrounding rugged terrain that receives inflow from various tributaries. The Environment Agency (EA) river catchment data explorer highlights that the north-western part of Monmouthshire (for example the area surrounding Abergavenny) lies in the River Usk catchment[149]. The developments allocated in the Monmouthshire LP will result in the increased production of wastewater in this part of Monmouthshire. It is expected that new housing in the western part of Monmouthshire will be served by local Wastewater Treatment Works, such as the one just south of Abergavenny. Any WwTWs in this area of Monmouthshire will discharge treated sewage effluent directly into the River Usk SAC, or in tributaries feeding it. As such, there is a clear linking impact pathway between the new development in Abergavenny and the SAC.

The Lower Wye flows from Glasbury in Wales south through Herefordshire, Monmouthshire, Gloucestershire and then joins the Severn Estuary near Chepstow. The surrounding area is primarily rural with mixed agricultural land use, including livestock, arable and horticulture. As identified in the EA catchment explorer development within the vicinity of Monmouth and Chepstow may lie within the operational catchment of the River Wye. Therefore, it is likely that sewage treated near these settlements will be discharged into the River Wye SAC. As for the River Usk SAC, there is therefore a clear linking impact pathway between Monmouth and Chepstow, and the River Wye SAC.

The Core Management Plans for both SACs indicate that the most significant source of water pollution is agriculture, including the input of fertiliser run-off, livestock manure, silage effluent and soil erosion from ploughed land. However, they also highlight that discharges from sewage treatment works, urban drainage systems and other urban sources are also significant sources of aquatic pollution and require consideration. To assess the likely impacts of sewage discharge on the SAC, it is important in establishing the rivers' current performance in relation to the Environment Agency's current water quality standards. For example, targets of 0.06 mg/l for phosphorus and 80% saturation for dissolved oxygen have been set for the River Usk SAC, to protect the integrity of the site. For the River Wye SAC, the site's Conservation Objectives Supplementary Advice Note states that dissolved oxygen should be at 85% saturation, the mean biological oxygen demand at 1.5 mg/l and the total ammonia 0.25 NH_3-N mg/l[150]. The Usk catchment management summary[151] highlights that out of 45 river water bodies, eight fail to achieve good chemical status due to pollution from sewage and waste water. A particular cause of concern is the Llwyd operational catchment, a sub-catchment of the Usk, where four of the five water bodies fail to reach their water quality target. In the River Wye SAC, the water industry (including wastewater) is cited as being responsible in 11 instances for water bodies in the Wye catchment not achieving good chemical status[152].

In Wales, the water quality of rivers is protected through the Review of Consents process agreed upon by the Environment Agency Wales (now Natural Resources Wales). This sets out the volume of sewage effluent that can be discharged into local watercourses by WwTWs, including thresholds for the discharge of phosphate, nitrogen, dissolved oxygen, biological oxygen demand and ammonia. WwWTs have a permitted headroom, based on their ability to process additional sewage effluent whilst remaining within the consented volume of discharge and water chemistry thresholds. While

[149] https://environment.data.gov.uk/catchment-planning/ManagementCatchment/3107
[150] http://publications.naturalengland.org.uk/publication/6096799802589184
[151] Published by Natural Resources Wales. Available at: https://naturalresources.wales/media/3214/usk-management-catchment.pdf
[152] Published by the Environment Agency Wales. Available at: https://environment.data.gov.uk/catchment-planning/OperationalCatchment/3549/Summary

these discharge consents typically consider the requirements of designated SAC features (implying that remaining within the permitted headroom would not lead to adverse effects on site integrity), there is new evidence that the existing WwTWs technology, sewer infrastructure and discharge consents are insufficient to protect SAC water quality.

For example, data on the Environment Agency Catchment Data Explorer indicate that various stretches of the River Wye SAC are failing the Water Framework Directive (WFD) target of good ecological status, partially fuelled by elevated phosphorus concentrations. Furthermore, the sewerage network feeding relevant WwTWs have not been upgraded to accommodate further growth. Combined sewers are designed to collect rainwater runoff, domestic sewage and industrial wastewater in the same pipe. In periods of heavy rainfall, their capacity can be exceeded, and these systems are designed to discharge untreated sewage directly to the environment (a process known as Combined Sewer Overflows; CSOs). CSOs are an existing issue in several waterbodies, including the Gavenny (in Abergavenny), Clydach and Llwyd. Other sources (e.g. agriculture, private Package Treatment Plants; PTPs) contribute additional phosphorus to the hydrological catchments of the two SACs. Elevated phosphorus concentrations within the River Usk SAC and River Wye SAC have been directly linked to negative changes in their ecosystems. High levels of algae have been recorded in both SAC rivers in summer 2021, coinciding with peak phosphorus concentrations (due to the combined input from agricultural and domestic sources).

Due to the increasing concern about high phosphorus concentrations in both riverine systems, Natural Resources Wales and Natural England have recently advised that development plans should not result in a net increase in phosphorus levels, a concept known as nutrient neutrality. Where developments do not achieve nutrient neutrality, mitigation measures are required to offset any increased phosphorus input. Natural Resources Wales provides detailed guidance on nutrient neutrality on their website[153]. Specifically, all new housing or development that leads to a temporary increase in the local population (e.g. self-service and serviced tourism accommodation) within the identified nutrient-sensitive areas is likely to increase phosphorus concentrations within the SAC rivers. While agricultural businesses (e.g. pig, poultry farms and organic manure developments / slurries) are a major source of nutrients, they are not typically allocated in Local Development Plans (LDPs) and, therefore, are excluded from further consideration on this HRA. Private sewage treatment systems (or PTPs) are deployed where it is unfeasible to connect new housing to the sewerage network and fall within the remit of LDPs.

Natural Resources Wales is currently undertaking a review of existing phosphorus discharge permits against the revised phosphorus targets, which is likely to result in lowered permits for some WwTWs. For residential developments that will connect to WwTWs which have been reviewed in context of the revised Conservation Objectives and where headroom is available to accommodate this additional wastewater, a conclusion of no adverse effects on site integrity can be drawn. Development proposals for which this is the case should be supported by a formal response from the sewerage undertaker, confirming the following:

- Headroom is available to treat additional wastewater from the development within the revised environmental permits (where applicable); and
- Headroom availability is guaranteed to be delivered in the agreed Asset Management Plan (AMP) period.

There is also additional information on the Council website[154]. A proposed development within a Phosphate sensitive area will need to ensure that it complies with the Planning Guidance from Natural Resources Wales (Version 3) referenced earlier. Head of planning on the SAC River Planning all Wales working group is reviewing the implications of NRW planning guidance and to try and work collaboratively to find solutions to the issue and allow development proposals. This working group is attended by NRW, Dwr Cymru Welsh Water, Welsh Government (Planning) and Local Planning Authorities that are impacted by the development. Monmouthshire Council has been meeting with DCWW and NRW to try and enable the installation and upgrading of their sewerage treatment plans to allow phosphate stripping capability in most sustainable settlements north of the county i.e. Llanfoist and Monmouth. In order to deliver growth and support sustainable forms of development

[153] Available at: https://naturalresources.wales/guidance-and-advice/business-sectors/planning-and-development/our-role-in-planning-and-development/advice-to-planning-authorities-for-planning-applications-affecting-phosphorus-sensitive-river-special-areas-of-conservation/?lang=en [Accessed on the 31/10/2022]
[154] https://www.monmouthshire.gov.uk/planning/water-quality/

within the north of the county it will be necessary to upgrade the drainage infrastructure or determine ways to mitigate for the impact of development.

In the Preferred Strategy HRA no housing was allocated in Monmouth due to issues with nutrient neutrality. However, in response to that document the Welsh Government has advised Monmouthshire Council that new site allocations should be considered in Monmouth on the basis that sufficient certainty is provided by Dwr Cymru Welsh Water's (DCWW) planned improvements at the Monmouth Wastewater Treatment Works by 31st March 2025[155]. Monmouthshire Council produced a phosphate briefing note in July 2023[156] which updates developers and sets out how issues with nutrients in the River Usk and Wye catchments will be addressed. Given the clear commitment from DCWW to provide phosphate mitigation at the Llanfoist and Monmouth WwTWs by 31St March 2025, the Local Planning Authority is now able to issue planning permissions within the area served by these two WwTWs, subject to a suitably worded 'Grampian condition' preventing commencement of development until 31st March 2025. This will give confidence to the development industry and unlock stalled sites while ensuring new development proposals do not have an adverse impact on water quality within the river SACs.

In relation to the other WwTWs within Monmouthshire, NRW is currently conducting a review of larger discharges (20m^3 per day or above) permits and water quality to review what capacity (if any) exists to enable development proposals to come forward while ensuring betterment or neutrality of phosphate levels. This pan-Wales approach is supported by the Welsh Government. Source apportionment data shows that the majority of phosphates entering the rivers come from agricultural activity. Some of these activities, such as new intensive poultry units, require planning permission and are therefore subject to the requirement to demonstrate phosphate neutrality or betterment. There are no such proposals currently within the Monmouthshire LPA area, however there are several proposals upstream in Powys and Herefordshire. Other agricultural activity such as fertiliser spreading and muck spreading fall outside of the Council's control and are in part regulated by Natural Resources Wales (or the Environment Agency in England) and are in part unregulated. The Welsh Government is currently considering the introduction of additional controls over such activities.

In addition to recent human activity, the soil naturally contains phosphates. Together with historic fertiliser application, the river catchments contain elevated levels of 'legacy phosphates' which will take many years to reduce. These phosphates enter the rivers via both normal land drainage and, most notably, via flood events. The Welsh Government and the Council may also seek to work with farmers and other bodies to explore the potential for natural flood management solutions, which would have the combined benefits of reducing surface water flooding and reducing phosphate levels entering the rivers from surface water runoff.

5.4.1.1 Wye Nutrient Management Board, Wye Cabinet Commission, Wye Catchment Partnership and Usk Catchment Partnership

Monmouthshire County Council is a member of the Wye Nutrient Management Board, the Wye Cabinet Commission, the Wye Catchment Partnership and the Usk Catchment Partnership. These groups seek to achieve the long-term ecological sustainability within the river catchments.

The Wye Nutrient Management Board is the body responsible for ensuring the delivery of the Conservation Objectives for the River Wye Special Area of Conservation. It provides an oversight and direction to all involved in delivering the Nutrient Management Plan, with the aim of reducing phosphorus in the river. Members of the Board include Local Planning Authorities, NRW, DCWW, Natural England, Environment Agency, Construction Industry Lobby Group, representatives of the farming industry, The Wye and Usk Foundation and members of the public. The Board works together to review contributions across all organisations, working collaboratively to achieve the objectives and ensuring all members understand the issues and work together to resolve them. A technical group supports the Board to inform decision making. The Nutrient Management Action Plan is reviewed every four years to ensure it is fit for purpose.

[155] Latest News - Monmouthshire.
[156] Phosphate Briefing Note July 2023 (monmouthshire.gov.uk)

Monmouthshire County Council has recently joined the Wye Cabinet Commission, which comprises of local government political and officer leads from Herefordshire, Powys and Monmouthshire County Councils and Bannau Brycheiniog National Park Authority.

The Usk Catchment Partnership's aim is to develop an action-focused partnership to build back ecological resilience to the River Usk. The main contributors are Local Planning Authorities, Wye and Usk Foundation, Gwent Wildlife Trust, NRW, DCWW, farming representatives, community representatives and Cardiff Water School. The long-term aim of the partnership is to develop a Catchment Action Plan that can be adopted by all partners to deliver its actions and ensure the ecological health of the wider river catchment improves over time.

It is noted that the Monmouthshire LP already contains some broad policy wording that protects the water quality within the authority from adverse effects. Strategic Policy S4 (Climate Change) stipulates that new development should be '***Incorporating water efficiency measures and minimising adverse impacts on water resources and quality***'. Furthermore, Strategic Policy S5 (Green Infrastructure, Landscape and Nature Conservation) outlines that development proposals must '***maintain, protect and enhance the integrity and connectivity of Monmouthshire's green infrastructure, landscape and biodiversity assets through the following key functions:… iii)Biodiversity and resilient ecosystems by protecting, assessing, positively managing and enhancing biodiversity and geological interests, including designated and non-designated sites, protected and priority species and their habitats, and the ecological connectivity between them***'.

One of the key concerns whether new development can be delivered without adverse effects on European sites with aquatic habitats, is whether the appropriate WwTW infrastructure is in place. Strategic Policy S6 (Infrastructure Provision) states that ***'the infrastructure needed to service and deliver sustainable development must be in place or provided in phase with proposed development. Where existing infrastructure is inadequate to serve the development, new or improved infrastructure and facilities to remedy deficiencies must be provided.***' While this would include the sewage infrastructure, this is currently not specifically mentioned.

Monmouthshire Council has confirmed that phosphate solutions have been agreed as part of a wider approach to the issue in partnership with Natural Resources Wales and Welsh Water. Natural Resources Wales has issued a new version of detailed planning guidance that has to be met satisfied in relation to both planning applications and allocations. This guidance will be considered as part of the HRA process. The RLDP allocations have been made in consultation with Welsh Water and Natural Resources Wales, having regard to headroom limits and phosphate solutions proposed Policy NR3 – Protection of Water Sources and the Water Environment sets out requirements for development which may impact upon the water environment and associated land. Given this, it is concluded that there would not be adverse effects on the site integrity of the River Usk SAC and the River Wye SAC regarding water quality.

5.4.1.2 In-Combination Assessment

It is to be noted that the evidence used to set the thresholds for aquatic parameters (e.g. dissolved oxygen, nitrogen) is derived from an in-combination approach that aims at protecting the integrity of the riverine SACs. The Natural Resources Wales (formerly Environment Agency) Review of Consents process sets wastewater discharge limits for WwTWs within Monmouthshire, while accounting for discharged effluent arising from development allocated within the Plans of adjacent authorities. The same also applies to the concept of nutrient neutrality, which emerges from the cumulative growth in all hydrologically linked authorities contributing phosphorus to the River Wye SAC and River Usk SAC. As such, the impact pathway water quality, including the phosphate neutrality issue, is by definition assessed in-combination with growth in other authorities. Furthermore, the HRAs of development plans of surrounding authorities (e.g. those of Powys, Herefordshire and Blaenau Gwent) concluded there were no adverse impacts of Plans on the river SACs (although it is noted that some of these assessments will require updating in line with the emerging nutrient neutral approach adopted for the SACs). The HRA for the Forest of Dean Local Plan[157] states that the River Wye is close to its phosphate targets at some monitoring points but levels are stable, with concerns being for the River Lugg upstream of the Forest of Dean Local Plan area. However, it also identifies that a precautionary approach should be taken to incombination effects with the emerging Monmouthshire

[157] https://www.fdean.gov.uk/media/pd4llk1n/habitats-regulations-assessment-screening-and-appropriate-assessment-report-june-2024.pdf

LDP at Chepstow. It is therefore concluded that, provided adequate phosphate mitigation is identified and secured, there would be no adverse effects on the site integrity of the River Usk SAC and the River Wye SAC regarding water quality, in-combination with other Plans.

5.4.2 Severn Estuary SAC

The Severn Estuary SAC is designated for several habitats and species, which are potentially sensitive to a deterioration in water quality. The estuary and the subtidal sandbanks habitats are both considered sensitive to changes in nutrient loading in principle, however due to the high turbidity of water in the SAC, algal productivity is generally low except for very localised hotspots. However, the sand- and mudflats present in the SAC are highly vulnerable to increasing nutrient loading. One consequence of increased nutrient input is the growth of green seaweeds and reduced oxygenation on the mudflats. Importantly, at high nutrient enrichment levels, species diversity declines with a modal shift to fewer, but pollution tolerant species. The Atlantic salt meadows habitat component is also highly vulnerable to nutrient enrichment. Elevated concentrations of phosphorus and, particularly, nitrogen lead to the dominance of some seaweed species with an adverse effect on glasswort and the overall structure of the sward. All additional treated sewage effluent discharge arising from development allocated in the Monmouthshire LP is likely to enter the Severn Estuary SAC, either because it is directly discharged into the SAC or because it enters indirectly, via the Rivers Usk and Wye (see previous section on the Appropriate Assessment).

The underlying mechanism through which water quality impacts of development may be ameliorated, is the process of pollutant attenuation. Importantly, catchment-scale modelling has shown that the total nitrogen and total phosphorus load within watercourses is generally attenuated within a few tens of kilometres[158]. Another study demonstrated that 100% of the nitrogen and phosphorus loads was attenuated within a 5km section of a coastal watershed[159]. It is to be noted that pollutant attenuation is a complex process and dependent on various site-specific conditions, but these attenuation distances nevertheless serve as a useful starting point for an Appropriate Assessment of the impact pathway water quality.

Assuming that the net new residential dwellings in Monmouth would be treated and discharged locally, the wastewater effluent would enter the River Wye approx. 32km flow distance to the north of the Severn Estuary SAC. Given the above cited distances for nutrient attenuation, it is assumed that phosphorus and nitrogen in wastewater discharge from Monmouth would effectively be inconsequential for the SAC. Similarly, development in Abergavenny is located far beyond 30km of flow distance to the north of the Severn Estuary SAC, rendering any water quality impacts immaterial for the estuary. In contrast, both Severnside and Chepstow are located within 1km flow distance of the Severn Estuary SAC. Additional development in these areas therefore has the potential to result in significant nutrient enrichment in the SAC.

However, it is considered that any adverse effects on the Severn Estuary SAC regarding water quality are addressed through the Environment Agency's (now Natural Resources Wales) Review of Consents process (see previous Appropriate Assessment on the River Usk SAC and the River Wye SAC). Given that this process considers the qualifying features of European sites, it also ensures that the permitted headroom of WwTWs does not damage the integrity of the Severn Estuary SAC. It is concluded that there would be no adverse effects of the LP on the site integrity of the Severn Estuary SAC regarding the impact pathway water quality.

5.4.2.1 In-Combination Assessment

Numerous authorities border the Severn Estuary SAC, including Newport, Forest of Dean and South Gloucestershire. Development allocated within the Plans of these authorities therefore has the potential to affect the water quality in the Severn Estuary SAC in-combination. However, as a legal requirement, HRAs have been undertaken on all these Plans, assessing in-combination effects on European sites. The HRAs have concluded that there will be no in-combination effects on the water quality in the Severn Estuary SAC. For example, the HRA of the Newport LDP concluded that the proposed schemes would have no in-combination effects on the Severn Estuary SAC due to there

[158] Bray E.N., Chen X. & Keller A.A. 2010. Instream attenuation of nitrogen and phosphorus in non-point source dominated streams: Hydrologic and biogeochemical controls. AGU Fall Meeting Abstracts.
[159] Ensign S.H., McMillan S.K., Thompson S.P. & Piehler M.F. 2006. Nitrogen and phosphorus attenuation within the stream network of a coastal, agricultural watershed. Journal of Environmental Quality 35: 1237-1247.

being no local waterways connecting to the SAC. Given the evidence in the relevant HRAs, it is concluded that there would be no adverse effects of the Monmouthshire LP on the site integrity of the Severn Estuary SAC regarding the impact pathway water quality in-combination with other Plans.

5.5 Water Quantity, Level and Flow

5.5.1 River Usk SAC & River Wye SAC

Due to the similar ecological nature and qualifying features of the River Usk SAC and the River Wye SAC, this section combines the Appropriate Assessment for both sites.

As highlighted in the screening section for LSEs, both SACs depend on naturally fluctuating hydrological regimes with annual fluctuations in water volume and current velocity. While a certain degree of variability is desirable, the changes in water flow and level need to remain within natural limits and in accordance with the life cycle of the SAC's qualifying features. For example, Atlantic salmon require changing water depth depending on its life stage. During the spawning and incubation periods, the water depth should be 15 – 75 cm, suitable fry habitat should be below 20 cm in depth and parr habitat between 20 – 40 cm. Major water abstractions are also likely to reduce the maximum river flows in the migratory period and on a diurnal timescale, resulting in the exposure of lamprey nests and nursey areas above the water level. Furthermore, the flow conditions are highly important in enabling anadromous fish to reach their spawning grounds and ensuring that juveniles are not washed into marine water prematurely. Overall, the natural flow regime within the SACs maintains the characteristic biotope mosaic that is necessary to maintain the biological integrity of the site. The main target for the rivers is to maintain 90% of the naturalised daily mean flow throughout the year.

An investigation into water resources, level and flow requires, in the first instance, the consideration of the available water resources in area. The available resources then need to be set into the context of the current and future exploitation rates. Based on the Environment Agency's water stress classification system, the rivers are located within a wider area of low water stress[160]. Irrespective of this, water abstraction for domestic water supply is the most important pressure on the water volumes in both the Usk and the Wye catchments. For example, in the River Usk the public water supply accounts for 94% of the catchment's total annual abstraction[161]. This abstraction accounts for a large proportion of the potable water supply across south-east Wales and is transported across the region through an intensive system of water transport infrastructure. This water abstraction system is augmented by six public water supply impoundment reservoirs within the catchment. At low flow conditions, potentially prohibitive of abstraction, these reservoirs discharge water into the 'low flow' Usk for abstraction further downstream.

In 2019, Welsh Water, the company responsible for the potable water supply in Wales, published its final Water Resources Management Plan (WRMP) for the period between 2010 and 2050[162]. This was updated in 2024[163]. This strategic report primarily exists to ensure that there is sufficient potable water to supply future housing growth in Wales (considering factors such as climate change) and that water abstraction is undertaken sustainably, particularly during dry periods when the impact of water abstraction is likely to be greatest. The water supply area of Dwr Cymru Welsh Water is divided into three regions (North Wales, South West Wales, South East Wales), which are further subdivided into Water Resource Zones (WRZs). Development allocated in the Monmouthshire LP would be spread between the South East Wales Conjunctive Use System (SEWCUS), the largest of the WRZs with approx. 40% of the total demand in Wales, and the Monmouth WRZ, which supplies the market town of Monmouth and the surrounding villages.

[160] Environment Agency. 2013. Water stressed areas – Final classification. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/244333/water-stressed-classification-2013.pdf [Accessed on the 28/08/2019]
[161] Natural resources Wales. 2017. River Usk Abstraction Licensing Strategy. Available at: https://naturalresources.wales/media/682209/river-usk-abstraction-licensing-strategy-july-2017.pdf [Accessed on the 28/08/2019]
[162] Dwr Cymru Welsh Water. 2019. Final Water Resources Management Plan 2019. Available at: https://www.dwrcymru.com/en/My-Water/Water-Resources/Final-Water-Resources-Management-Plan-2019.aspx [Accessed on the 28/08/2019]
[163] Revised Draft Water Resources Management Plan 2024 | Dŵr Cymru Welsh Water (dwrcymru.com) [Accessed on 16/08/2024]

The potable water supply in the SEWCUS WRZ is abstracted from the downstream reaches of both the River Usk and the River Wye catchments, indicating that water supplying development in Chepstow and Abergavenny will be derived from a combination of the two SACs. The WRMP notes that there is an anticipated deficit in water resources over the local plan period and details preferred actions to be taken in order to ensure sufficient drought resilience within the system. An HRA of the works required under this plan has been conducted and has concluded that there will be no significant impacts of the WRMP on either of the SACs.

The Monmouth WRZ primarily sources its potable water from the Mayhill abstraction from the River Wye at Monmouth. Furthermore, a small spring abstraction is at Ffynnon Gaer, which supplies an area south of Monmouth. The supply-demand balance projected in the 2019 plan for the zone indicates that the reported deployable output is approx. 4.1 Ml/d throughout the planning period, which exceeds the maximum demand of approx. 3.6 Ml/d in 2020/21. As such, the water resources that are available exceed the demand for water supply throughout the entire LP period. The 2024 update did not highlight any deficit and highlighted that the existing system is resilient to both 1 in 200-year and 1 in 500-year droughts throughout the plan period. Overall, the WRMP covers the entire Monmouthshire LP period, and the growth allocated therein. It is therefore considered that implementation of the Plan would not negatively impact the water quantity, level and flow within the River Usk SAC and the River Wye SAC.

The Core Management Plans for the SACs, published by Natural Resources Wales, highlight the potential impact that a few major abstractions (if fully utilised) might have on flow conditions within these rivers. Due to this, the Review of Consents process has set flow targets to remove effects of this impact pathway on the qualifying fish species (for example as detailed in Annex 1 of the Core Management Plan for the River Usk SAC). This process uses recent daily mean flow data to set abstraction license conditions and hourly maximum abstraction rates to reduce human-induced diurnal flow variations. Of particular significance for the SAC features is the inclusion of hands-off flow conditions. Hands-off flow conditions mark the water threshold that is required to maintain the ecological integrity of the SAC, below which any abstraction activities must be stopped. Overall, due to the projected headroom in Monmouthshire's WRZs and the principle of Hands-off Flow, it is concluded that the Monmouthshire LP will not result in adverse effects on the integrity of the River Usk SAC and the River Wye SAC regarding the impact pathway water quantity, level and flow.

As outlined in the previous section, the Monmouthshire LP (see Policies S4 and S5) already contains some broad policy wording that protects European sites, which are reliant on water supply, from adverse effects. It is acknowledged that these policies provide some basic protection to the River Usk SAC and the River Wye SAC regarding adverse effects from the impact pathway water quantity, level and flow. However, due to the sensitivity of these SACs to water abstraction, it is recommended that specific reference to the sites and the relevant flow targets established by Natural Resources Wales is made in the supporting text to either of these policies. **The following text could be added to ensure greater protection of the rivers' flow regimes: *'Any development proposals have to ensure that there will be no adverse effects on the site integrity of the two riverine SACs, the River Usk SAC and the River Wye SAC, regarding water quantity, level and flow. In particular, development will not be permitted if it cannot be accommodated under the Review of Consents for flow in these rivers, including the maximum permissible percentage reduction from naturalised flow levels and hands-off flow conditions.'***

Monmouthshire Council have commented that this has been considered as part of the plan making process in consultation with Welsh Water in relation to allocations. Proposals coming forward via planning applications are required to satisfy detailed planning guidance published by Natural Resources Wales so a specific DM policy is not considered necessary.

5.5.1.1 In-Combination Assessment

Similar to the evidence base for the water quality impact pathway, the thresholds for abstraction licenses and hand-off flows are set according to an in-combination approach, such that the integrity of the riverine SACs is protected. As such, the impact pathway water quantity, level and flow, is by definition assessed in-combination with growth in other authorities. Abiding by these thresholds, which account for the most accurate available scientific evidence, therefore implies that there will be no adverse impacts in-combination with the growth in surrounding authorities. Furthermore, the HRAs of development plans of surrounding authorities (e.g. those of Powys and Blaenau Gwent) concluded

there were no adverse impacts of Plans on the river SACs. It is therefore concluded that there would be no adverse effects on the site integrity of the River Usk SAC and the River Wye SAC regarding water quantity, level and flow in-combination with other Plans.

5.5.2 Severn Estuary SAC

The Severn Estuary SAC includes habitats and species that are likely to be sensitive to changes in the water quantity and flow rate. The primary mechanism by which the Monmouthshire LP could affect this would be a change in the water quantity supplied by the Rivers Usk and Wye, most likely a reduction in freshwater input due to water abstraction for the public water supply of new development. For example, the estuary, and the sand- and mudflat habitats are sensitive to changes in water flow rates, which might potentially lead to sediment accretion or erosion in certain locations. Similarly, the Atlantic salt meadow components might be sensitive to a reduction in water flow rates because of the increased deposition rates of sediments in the habitat. The sensitivity of the Severn Estuary SAC also extends to its animal species, which will depend on sufficient hydrological input to migrate up the Rivers Usk and Wye. While many of the qualifying features of the SAC are sensitive to changes in salinity, this mainly relates to reduced salinity within the estuary, for example as a consequence of heavy rainfall events. There is no mechanism by which the Monmouthshire LP could trigger a reduction in the salinity of the SAC, and this is therefore not discussed further in this HRA. Changes to the water flow rate within an estuary can be associated with a multitude of further impact pathways, including substratum loss, smothering and changes in wave exposure, and often interact with coastal squeeze. However, in its current form, the Monmouthshire LP does not propose for development that might directly affect these processes in the SAC. The remainder of this section therefore addresses whether the LP might affect the water flow rate within the Severn Estuary SAC.

As discussed in detail in the Appropriate Assessment section on the River Usk and the River Wye SACs, the Monmouthshire LP will increase the water abstraction from both riverine SACs, which may affect the water flow rates in the rivers. However, Dwr Cymru's WRMP (see previous section) concludes that the water supply for Monmouthshire is in surplus for the entire planning period, indicating that the water can be supplied without an adverse effect on relevant European sites. Furthermore, the Review of Consents process undertaken in relation to the River Usk and the River Wye SACs, ensures that the flow will not deviate significantly from natural conditions. While the Review of Consents process was carried out to protect the integrity of the riverine SACs, maintaining the natural flow conditions within the Usk and the Wye will also maintain an appropriate freshwater input into the Severn Estuary SAC. In turn, this ensures that the water flow rate and the hydrological connectivity within the SAC will not adversely affect qualifying habitats (e.g. Atlantic salt meadows) or species (e.g. twaite shad, lampreys). For example, the maintenance of freshwater flow into the SAC will provide hydrological connectivity for anadromous fish species to migrate from the estuary to their upstream spawning grounds. Therefore, given that the policy wording recommended in the previous section (impact pathway water quantity, level and flow in relation to the Rivers Usk and Wye SACs), it is concluded that the Monmouthshire LP will not result in adverse effects on the integrity of the Severn Estuary SAC regarding the impact pathway water quantity, level and flow.

5.5.2.1 In-Combination Assessment

Numerous authorities border the Severn Estuary SAC, including Newport, Forest of Dean and South Gloucestershire. Development allocated within the Plans of these authorities therefore has the potential to affect the water quantity, level and flow in the Severn Estuary SAC in-combination. However, as a legal requirement, HRAs have been undertaken on all these Plans, assessing in-combination effects on European sites. The HRAs have concluded that there will be no in-combination effects on the water quantity, level and flow in the Severn Estuary SAC. For example, the HRA of the Newport LDP concluded that the proposed schemes would have no in-combination effects on the Severn Estuary SAC due to there being no waterways connecting to the SAC. Given the evidence in the relevant HRAs, it is concluded that there would be no adverse effects of the Monmouthshire LP on the site integrity of the Severn Estuary SAC regarding the impact pathway water quantity, level and flow in-combination with other Plans.

6. Conclusion

With the changes made to the Local Plan in response to recommendations, it is considered that the Monmouthshire Local Plan contains a sufficient policy framework that no adverse effect would arise on Habitats sites either alone or in combination with other plans or projects.

Appendix A Map of Habitats sites

THIS DRAWING IS TO BE USED ONLY FOR THE PURPOSE OF ISSUE THAT IT WAS ISSUED FOR AND IS SUBJECT TO AMENDMENT

LEGEND

- Monmouthshire Authority Boundary
- Study Area Buffer -15km

Special Area of Conservation (SAC)

- Aberbargoed Grasslands
- Avon Gorge Woodlands
- Coed y Cerrig
- Cwm Clydach Woodlands
- Llangorse Lake
- River Usk
- River Wye
- Usk Bat Sites
- Wye Valley Woodlands
- Wye Valley and Forest of Dean Bat Sites

SAC / SPA / Ramsar

- Severn Estuary

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Purpose of Issue

DRAFT

Client

MONMOUTHSHIRE COUNTY COUNCIL

Project Title

HRA OF THE MONMOUTHSHIRE LOCAL DEVELOPMENT PLAN PREFERRED STRATEGY

Drawing Title

EUROPEAN SITES WITHIN 15KM OF THE BOUNDARY OF MONMOUTHSHIRE

Drawn	Checked	Approved	Date
AM	DW	DW	16/09/2024

AECOM Internal Project No. 60609986

Scale @ A3 1:300,000

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Drawing Number: FIGURE A

Rev: 01

5 0 5 10 15 20 25 km

File Name:\\eu.aecomnet.com\europrojectvol\UKGLG3-IE\General\GIS\01 - Jobs\#2019\191108_Monmouthshire HRA map\02_Maps\Figure 1v1_ Location of European Designated Sites.mxd

Appendix B Policy Screening Table

Policy	Text	Assessment
LP Strategic Framework		
LP Sustainable and Resilient Communities Strategy		
Strategic Policy S1 – Growth Strategy	In order to meet Monmouthshire's core purpose of building sustainable and resilient communities for all, between 2018 and 2033 the Plan will make provision for: • 6,210* homes to meet a housing requirement of 5,400 homes. • A minimum of 38ha of employment land (Use Classes B1, B2, B8). The focus of this growth will be on the County's most sustainable settlements, as outlined in the sustainable settlement hierarchy set out in Policy S2.	Likely Significant Effects on European sites cannot be excluded. This policy identifies that a quantum of 6,210 net new homes and 38ha net new employment land will be delivered in Monmouthshire during the LP period to 2033. The growth will be focused in the county's most sustainable settlements. **Potential impact pathways are present:** • **Atmospheric pollution** • **Recreational pressure** • **Loss of functionally linked land** • **Water quality** • **Water quantity, level and flow** Due to these potential linking impact pathways Strategic Policy S1 is screened in for Appropriate Assessment.

<table>
<tr><th>Policy</th><th>Text</th><th>Assessment</th></tr>
<tr>
<td>Strategic Policy S2 – Spatial Distribution of Development – Settlement Hierarchy</td>
<td>In order to deliver sustainable and resilient communities for all, the main focus for new development will be distributed based on the following settlement hierarchy:
<table>
<tr><th colspan="2"></th><th colspan="2">Distribution of Residential Growth*</th><th colspan="2">Distribution of Employment Growth</th></tr>
<tr><th colspan="2">Settlement Hierarchy</th><th>Indicative % of distribution</th><th>Indicative No. of homes</th><th>% of distribution</th><th>Hectares</th></tr>
<tr><td>Tier 1</td><td>Primary Settlements:
Abergavenny
(inc. Llanfoist)
Chepstow

Monmouth
(inc. Wyesham)
Caldicot
(inc. Severnside Area comprising of: Caerwent, Crick, Magor Undy, Portskewett, Rogiet and Sudbrook)</td><td>22%

13%

15%

35% across Severnside Area</td><td>1,362

829

923

2,190 across Severnside Area</td><td>3%

11%

11%

66%</td><td>1.7ha**

6.4ha

5.84ha

37.86ha</td></tr>
<tr><td>Tier 2</td><td>Secondary Settlements:
Penperlleni
Raglan
Usk</td><td>6% across Secondary Settlements</td><td>350 across Secondary Settlements</td><td>10%</td><td>6.05ha</td></tr>
<tr><td>Tier 3</td><td>Main Rural Settlements:
Devauden
Dingestow
Little Mill
Llandogo
Llanellen
Llangybi
Llanover
Llanvair Discoed</td><td></td><td></td><td></td><td></td></tr>
</table>
</td>
<td>Likely Significant Effects on European sites cannot be excluded.

This policy identifies the settlements in which development will occur in Monmouthshire during the Plan period of 2018-2033. It also provides the quantum of residential and employment development to be delivered in each of the settlements across the county. The largest amount of residential growth is predicted for the Primary Settlements Abergavenny (22%), Chepstow (13%), Monmouth (15%) and Caldicot (35%, which includes the Severnside Area). The largest overall quantum of employment development is also forecast in the Primary Settlements.

The quantum and location of development are key factors in determining the magnitude of negative impact pathways linking to European sites.

Potential impact pathways are present:
• Atmospheric pollution
• Recreational pressure
• Loss of functionally linked land
• Water quality
• Water quantity, level and flow

Due to these potential linking impact pathways Strategic Policy S2 is screened in for Appropriate Assessment.</td>
</tr>
</table>

Policy	Text						Assessment
		Mathern Pwllmeyric Shirenewton/ Mynyddbach St Arvans Tintern Trellech Werngifford/Pandy	9% across Main Rural and Minor Rural Settlements (Tiers 3 and 4)	556 across Main Rural and Minor Rural Settlements (Tiers 3 and 4)	0%	0ha	
	Tier 4	**Minor Rural Settlements:** Bettws Newydd Broadstone /Catbrook Brynygwenin Coed y Paen Cross Ash Cuckoo's Row Great Oak Grosmont Gwehelog Llanarth Llanddewi Rhydderch Llandegveth Llandenny Llangwm Llanishen Llansoy Llantilio Crossenny Llantrisant Llanvair Kilgeddin Llanvapley Mitchel Troy Penallt Penpergwm The Bryn The Narth Tredunnock					

Policy	Text	Assessment
	Settlement boundaries will be defined for Settlement Tiers 1 – 3, within which the principle of development is considered to be acceptable, subject to detailed policy considerations set out in the RLDP. Within Tier 4 – Minor Rural Settlements, minor infilling between existing buildings will be considered acceptable, subject to detailed policy considerations set out in the RLDP. Outside of Tiers 1 – 4, open countryside policies will apply where planning permission will only be allowed for the following types of development, subject to satisfying detailed planning criteria: • Acceptable conversions of rural buildings • Sub-division of existing dwellings • Rural Enterprise Dwellings • One Planet Development • Rural diversification and rural enterprise uses • Affordable housing exception sites adjoining settlement boundaries to meet local needs • Gypsy and Traveller Sites	
Managing Settlement Form		
Policy OC1 – New Built Development in the Open Countryside	There is a presumption against new built development in the open countryside, unless justified under national planning policy. Proposals for new built development in the open countryside will only be permitted where justified under national planning policy and all the following criteria are met: a) The proposal is satisfactorily assimilated into the landscape and complies with Policies LC1, GI1, T1, RE3, RE4 and NR1; New buildings are wherever possible located within or close to existing groups of buildings; The development design is of a form, bulk, size, layout and scale that respects the character of the surrounding countryside; and The development will have no unacceptable adverse impact on landscape, historic / cultural or geological heritage, biodiversity, dark skies and local amenity value.	There are no LSEs of this policy on European sites. This is a development management policy that protects the open countryside from new development, unless a range of criteria are met (such as having no adverse impacts on biodiversity and dark skies). The policy does not specify any quantum or location of housing and / or employment development. Overall, there are no impact pathways present and Policy OC1 is screened out from AA.

Policy	Text	Assessment
Policy GW1 – Green Wedge Designations	Green Wedges have been designated in the land between the following areas, as shown on the Proposals Map. a) Abergavenny, Llanfoist and the BBNP boundary; Chepstow, Pwllmeyric and Mathern; Portskewett and Sudbrook; Rogiet and Caldicot; Shirenewton and Mynyddbach Undy, Llanfihangel Rogiet and Rogiet. There is a presumption against new built development within green wedge designations unless exceptionally justified under national planning policy.	There are no LSEs of this policy on European sites. This is a development management policy that designates green wedges across Monmouthshire in which no new development will be permitted. The policy does not specify any quantum or location of housing and / or employment development. Overall, there are no impact pathways present and Policy GW1 is screened out from AA.
Placemaking and Design		

Policy	Text	Assessment
Strategic Policy S3 – Sustainable Placemaking and High Quality Design	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. In order to achieve this, development must: i. Incorporate high quality, sustainable, safe and inclusive design that offers ease of access for all and provides connectivity between uses; ii. Incorporate an appropriate mix of uses, where applicable, to minimise the need to travel and to maximise opportunities for sustainable travel; iii. Incorporate a green infrastructure-led approach that respects local distinctiveness and the character of the site and its surroundings; and iv. 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.	There are no LSEs of this policy on European sites. This is a development management policy that promotes high quality, attractive and sustainable places across Monmouthshire. It specifies that green infrastructure should be incorporated in new developments and the natural environment should be protected / enhanced. The policy does not specify any quantum or location of housing and / or employment development. Overall, there are no impact pathways present and Strategic Policy S3 is screened out from AA.

Policy	Text	Assessment
Policy PM1 – Creating Well-Designed Places	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. Development proposals will be required to: a) Respect the existing form, scale, siting, height, massing, materials (including colour) and layout of its setting; Ensure a safe, secure, pleasant and accessible environment for all members of the community supporting the principles of community safety and maximising opportunities for connectivity to the wider environment; Contribute towards a sense of place and identity whilst ensuring that the location, scale, amount, mix of use and density of development, including cumulative impact, is compatible with existing uses and its local context; Respect and enhance local distinctiveness and landscape character as defined through the LANDMAP process, particularly where built and natural views, panoramas or historical features are present; Maintain reasonable levels of privacy and amenity of occupiers of neighbouring properties, where applicable; Ensure that existing residential areas are protected from overdevelopment and insensitive or inappropriate infilling; Integrate multifunctional green and blue infrastructure and public open space within site boundaries, providing connectivity to wider networks as appropriate.	There are no LSEs of this policy on European sites. This is a development management policy that delivers high-quality sustainable design across Monmouthshire, respecting its local character and distinctiveness. Importantly, multifunctional green and blue infrastructure with connectivity to the wider network will be integrated. The policy does not specify any quantum or location of housing and / or employment development. Overall, there are no impact pathways present and Strategic Policy PM1 is screened out from AA.

Policy	Text	Assessment
Policy PM2 – Environmental Amenity	Development proposals that would cause or result in a significant risk/harm to local amenity, health, the character/quality of the countryside or interests of nature conservation, landscape or built heritage importance, due to the following, will not be permitted unless it can be demonstrated that measures can be taken to overcome any significant risk: Air pollution; Light pollution; Noise pollution; Water pollution; Contamination.	There are no LSEs of this policy on European sites. This is a development management policy that protects Monmouthshire's environmental amenity (including interests of nature conservation) from various pollution sources. This is positive for European sites, which are sensitive to a wide range of pollution issues listed here, including air, light, noise and water pollution. For example, protection from air pollution is essential for nitrogen-sensitive habitats / species, such as those present in the Cwm Clydach SAC. The policy does not specify any quantum or location of housing and / or employment development. Overall, there are no impact pathways present and Policy PM2 is screened out from AA.

Policy	Text	Assessment
Policy PM3 – Advertisements	Proposals for advertisements will only be permitted where: a) Having regard to the existing number and siting of advertisements in the locality the proposal would not result in an unacceptable clutter of advertisements; Existing means of support are used for signs, wherever possible; If located within the open countryside they would not unacceptably detract from the rural setting of the locality; If located in a Conservation Area, they would not unacceptably detract from the character or appearance of the area; If located within the open countryside or a Conservation Area, externally lit signs are only appropriate to enable signposting to uses trading outside of daylight hours; There would no adverse impact on public or highway safety. Proposals for bilingual signs and advertisements will be supported in principle, subject to detailed planning considerations.	There are no LSEs of this policy on European sites. This is a development management policy that relates to the provision of advertisements across Monmouthshire. However, this has no relevance to the integrity of European sites. The policy does not specify any quantum or location of housing and / or employment development. Overall, there are no impact pathways present and Policy PM3 is screened out from AA.
Policy HE1 – Conservation Areas	Development including proposals for alterations, extensions or conversions of existing buildings within Conservation Areas or their settings must preserve or enhance the character or appearance[164] of the Conservation Area. They must also have regard to the Conservation Area Appraisal for that area. Development proposals within Conservation Areas will be permitted if they meet all of the following criteria: a) Have no adverse effect on important views into and out of the Conservation Area; Have no adverse effect on important vistas within and out of the area and the character and appearance of the street scene and roofscape, townscape or landscape setting; Pay special attention to complementing or reflecting the special architectural qualities and distinctiveness of the Conservation Area including development pattern, profile, form, scale, mass, detailing and materials; Pay special attention to the setting of the development and its open areas; Retain, restore or reinstate historic features and details of buildings, including garden or forecourt features, boundary walls, paving etc. as appropriate.	There are no LSEs of this policy on European sites. This is a development management policy that protects Conservation Areas from changes in their character and / or appearance. However, preserving Conservation Areas has no bearing on European sites. The policy does not specify any quantum or location of housing and / or employment development. Overall, there are no impact pathways present and Policy HE1 is screened out from AA.

[164] Section 72 of the Planning (Listed Buildings and Conservation Area) Act 1990 test refers to preserve or enhance character or appearance.

Policy	Text	Assessment
	Parking and servicing arrangements associated with new uses must not detract from the character or appearance of the Conservation Area. High quality modern design may be acceptable, particularly where new compositions and points of interest are created. Permission will be refused where proposals are unsympathetic to an existing building and/or detract from the character or appearance of the Conservation Area. Specialist recording, archiving and publishing may be required prior to the demolition of any historic building within a Conservation Area and may be required in other cases of alteration.	
Policy HE2 – Design of Shop Fronts in Conservation Areas	In Conservation Areas the removal of traditional shop fronts will not be permitted. Improvements to non-traditional shop fronts will be permitted where they retain historic features and the proposed improvements are in character with the area. Proposals to replace modern shop fronts will be permitted where they meet the following criteria: a) Reinstate or restore lost details which will enhance the Conservation Area; Use traditional arrangement, materials and paint colours; Integrate positively with the surrounding area, and where it replaces two or more units, respects the character of individual units; Have fascia boards and signage in keeping with the design, materials and scale of the character of the building in which they are set; and Use unobtrusive security measures such as internal shutters, toughened glass or traditional timber shutters. Do not incorporate internal illumination and any external illumination where necessary for night time trading is externally mounted and is of a scale, design and lux level appropriate to the building and shop front.	There are no LSEs of this policy on European sites. This is a development management policy that protects the design of traditional shop fronts across Monmouthshire. However, preserving shop fronts has no relevance for European sites. The policy does not specify any quantum or location of housing and / or employment development. Overall, there are no impact pathways present and Policy HE2 is screened out from AA.

Policy	Text	Assessment
Policy HE3 – Roman Town of Caerwent	Development within or adjacent to the walls and ditches of the Roman Town at Caerwent will only be permitted where it can be demonstrated: a) That the archaeological remains are left undisturbed; and b) That the special character and openness of the Caerwent Conservation Area is preserved or enhanced in accordance with the Caerwent Conservation Area Appraisal.	There are no LSEs of this policy on European sites. This is a development management policy that safeguards the Roman Town at Caerwent from development. However, this is of no relevance to European sites. The policy does not specify any quantum or location of housing and / or employment development. Overall, there are no impact pathways present and Policy HE3 is screened out from AA.

Policy	Text	Assessment
Climate Change		
Strategic Policy S4 – Climate Change	All development proposals will be required to address the causes of, and adapt to the impacts of, climate change. Means of achieving this will include: i. Avoiding locating development in areas at risk of flooding, or where appropriate, minimising the risk of flooding including the incorporation of measures such as Sustainable Drainage Systems (SuDs) and flood resilient design; ii. Incorporating low/zero carbon energy requirements by reducing energy demand and promoting energy efficiency through the design of buildings by prioritising fabric first and orientation design principles; iii. Supporting the development of renewable and low/zero carbon energy generation and storage and a presumption against energy generation utilising fossil fuels, fracking and methods that are not low/zero carbon; iv. Utilising sustainable construction techniques and local supplies through the adoption of the circular economy principles, where possible; v. Incorporating water efficiency measures and minimising adverse impacts on water resources and quality; vi. Using land efficiently and co-locating uses to minimise the overall need to travel and maximise opportunities for sustainable travel; vii. Providing ultra-low emission vehicles charging infrastructure to reduce emissions and improve air quality; and viii. Supporting the resilience of development through green infrastructure solutions, including opportunities for biodiversity and resilient ecosystems, greenspace provision and connectivity, and water resource management.	There are no LSEs of this policy on European sites. This is a development management policy that requires all development proposals to address the causes of and adapt to climate change. This includes a wide range of adaptations, such as avoiding areas at risk of flooding, incorporating SuDS and water efficiency measures, providing electric vehicle charging infrastructure and others. Some of these measures will be beneficial to European sites that are sensitive to water quality changes, water resources and atmospheric pollution. For example, avoiding areas of flood risk and incorporating SuDS will reduce the input of pollutants to aquatic environments, as well as help limit runoff to pre-development greenfield rates. The policy does not specify any quantum or location of housing and / or employment development. Overall, there are no impact pathways present and Strategic Policy 4 is screened out from AA.

Policy	Text	Assessment
Policy NZ1 – Monmouthshire Net Zero Carbon Homes	All new build residential development will be required to demonstrate that the standards outlined below are met through the submission of an appropriate energy assessment with any planning application for a new home. Development proposals for new homes must demonstrate that the new home/s meets the following: • Space heating demand less than 25KWh/m2/annum; • Evidence and achieve an energy performance rating of 'A' EPC; • Energy consumption generated by heating, hot water and lighting (regulated energy) must be generated by renewables on the dwelling or via the overall development (generated energy balance – net zero); • New homes should not connect to the gas grid and all heating should be provided through low carbon heating systems. No fossil fuels are to be used onsite; • Each home will have electric car charging infrastructure. All developments must submit an as built performance survey following construction and prior to occupation of the home/s to demonstrate that they have been built to the standards outlined above.	There are no LSEs of this policy on European sites. This is a development management policy that delivers net zero carbon homes across Monmouthshire. Development proposals will need to submit an appropriate energy assessment to demonstrate a range of criteria are met. The policy does not specify any quantum or location of housing and / or employment development. Overall, there are no impact pathways present and Policy NZ1 is screened out from AA.

Policy	Text	Assessment
Policy CC1 – Sustainable Drainage Systems	Development proposals will be expected to incorporate water management measures, including Sustainable Drainage Systems (SuDS), to reduce surface water run-off and minimise its contribution to flood risk elsewhere. The distribution of SuDS features across the site should be prioritised, reducing the size of any single SuDS feature.	[illegible] sites. This is a development management policy that requires all development proposals to incorporate water management measures, such as SuDS. This policy will have positive impacts on European sites that are sensitive to changes in water quality and water resources. For example, incorporating SuDS will help reduce the input of pollutants to aquatic environments. Furthermore, run-off will be reduced to greenfield rates, which will limit excessive input of water to hydrologically connected European sites. The policy does not specify any quantum or location of housing and / or employment development. Overall, there are no impact pathways present and Policy CC1 is screened out from AA.

Policy	Text	Assessment
Policy CC2 – Renewable Energy Allocation	Approximately 16 ha of Land at Raglan Enterprise Park, Raglan is identified as having potential for a ground mounted solar development, subject to detailed planning considerations. Opportunities for direct-access use should be fully explored and utilised as part of the proposal.	There are no LSEs of this policy on European sites. This policy identifies approx. 16ha of Land at Raglan Enterprise Park as having potential suitability for ground-mounted solar development. While the delivery of solar development at this site is potentially associated with impact pathways to European sites (e.g. loss of functionally linked habitat, visual / noise disturbance, water quality and others), this site is not formally allocated in the Deposit Plan. The policy only identifies potential suitability of the site for solar development. Any detailed planning proposal for the site would need to be subject to a project-level HRA to ensure that there are no LSEs and, where present, adverse effects on the integrity of any European sites. However, at the LP level, there are no impact pathways present and Policy CC2 is screened out from AA.

Policy	Text	Assessment
Policy CC3 – Renewable Energy Generation	Renewable and low carbon development proposals, inclusive of associated infrastructure, which contribute to meeting national and local renewable and low carbon energy efficiency targets will be permitted where: a) A sequential approach to site selection has been followed to demonstrate that any reasonable alternatives have been considered; Off-grid connection opportunities have been fully explored in addition to grid connection; There are no unacceptable cumulative impacts in combination with existing or consented development; There are no unacceptable adverse impacts upon the landscape, townscape and historic features and there is compliance with Policy LC1, with regard to protection and enhancement of landscape character; There are no unacceptable adverse impacts on biodiversity; There are no unacceptable adverse impacts on the amenities of nearby residents by way of noise, dust, odour or increases in traffic including construction and decommissioning stages; When the technology is no longer operational there is a requirement to decommission, remove the facility and complete a restoration of the site through an agreed restoration strategy; The wider environmental, economic, social and community benefits directly related to the scheme outweigh any potentially adverse impacts; and The distinct identity of Monmouthshire will not be compromised.	There are no LSEs of this policy on European sites. This policy identifies support in principle for renewable and low carbon development proposals across Monmouthshire, provided that a range of criteria are met. However, a general support of such proposals has no direct bearing on European sites. The policy does not specify any quantum or location of housing and / or employment development. Overall, there are no impact pathways present and Policy CC1 is screened out from AA.

Policy	Text	Assessment
Green Infrastructure, Landscape & Nature Recovery		
Strategic Policy S5 – Green Infrastructure, Landscape and Nature Recovery	Development proposals will adopt a strategic and proactive placemaking approach. An evidence based Green Infrastructure Assessment and step wise approach will inform design and long-term delivery of a multifunctional landscape; capable of delivering a wide range of social, economic, environmental, health and well-being benefits for local communities and the County as a whole, including climate change action, net benefit for biodiversity and ecosystem resilience. Development proposals must: Maintain, protect and enhance the integrity and connectivity of Monmouthshire's green infrastructure, landscape, biodiversity, access and heritage assets through the following key functions: i. Greenspace provision, connectivity and enjoyment by ensuring the creation of accessible multifunctional interconnected spaces and routes that offer opportunities for recreation and health and well-being; ii. Landscape setting and quality of place, by identifying, assessing, protecting and enhancing the natural and distinctive landscape, historical, cultural, ecological and geological heritage, including natural and man-made elements associated with existing landscape character; iii. Biodiversity and resilient ecosystems by protecting, assessing, positively managing and enhancing biodiversity and geological interests, including designated and non-designated sites, protected and priority species and their habitats, and the ecological connectivity between them; iv. Sustainable energy use; v. Local food production; and vi. Flood attenuation and water resource management.	There are no LSEs of this policy on European sites. This is a development management policy that requires all proposals to adopt a proactive placemaking approach, such as by undertaking a Green Infrastructure Assessment. For example, accessible multifunctional interconnected greenspaces will need to be created to offer opportunities for recreation. The provision of greenspace resources is positive for European sites that are sensitive to recreational pressure, as these constitute alternative recreation destinations and absorb some of the recreational demand created by new housing locally. The policy does not specify any quantum or location of housing and / or employment development. Overall, there are no impact pathways present and Strategic Policy S5 is screened out from AA.

Policy	Text	Assessment
Policy GI1 – Green Infrastructure	Development proposals will be expected to maintain, protect and enhance the integrity and connectivity of Monmouthshire's diverse GI network by: a) Undertaking an appropriate GI asset and opportunities assessment and step wise approach based on the scale and complexity of development to inform development proposals. All major development proposals will be required to submit a GI Assessment. a) Ensuring that existing GI assets are protected, retained and integrated into new development. Where loss of GI is unavoidable, in order to secure sustainable development, appropriate mitigation and/or compensation of the lost assets will be required. b) Incorporating new and /or enhanced GI of an appropriate type, standard and size. Where on-site provision of GI is not possible, contributions will be sought to make appropriate provision for GI off-site. A GI Statement must be provided with all planning applications. The statement will be proportionate to the scale, nature and complexity of the development proposed and will describe how GI has been incorporated into the proposal. The GI Statement will need to demonstrate how a step wise approach as outlined in chapter 6 of PPW12 has been applied.	There are no LSEs of this policy on European sites. This is a development management policy which ensures that planning proposals will enhance the integrity and connectivity of Monmouthshire's green infrastructure network. For example, developments will need to incorporate new or enhanced green infrastructure, as well as provide a Green Infrastructure Statement. The provision of greenspace resources is positive for European sites that are sensitive to recreational pressure, as these constitute alternative recreation destinations and absorb some of the recreational demand created by new housing locally. The policy does not specify any quantum or location of housing and / or employment development. Overall, there are no impact pathways present and Policy GI1 is screened out from AA.

Policy	Text	Assessment
Policy GI2 – Trees, Woodland and Hedgerows	Development proposals that would adversely impact on trees, woodland and hedgerows that are either a public amenity, of cultural heritage, provide important ecosystem services, are protected, or significantly contribute to GI connectivity will not be permitted. Where trees, woodland and hedgerows are present, development will only be permitted where they are informed by appropriate surveys, assessment and plans to identify and inform biodiversity, GI and landscape value, methods for retention, integration, protective mitigation and long-term protection through maintenance and management. If removal and/or damage is necessary, a scheme for replacement trees, woodland or hedgerows must be agreed as part of the development proposal design and will be subject to the minimum planning ratios as set out in National Policy.	There are no LSEs of this policy on European sites. This is a development management policy that protects trees, woodland and hedgerows from adverse impacts. The policy does not specify any quantum or location of housing and / or employment development. Overall, there are no impact pathways present and Policy GI2 is screened out from AA.
Policy LC1 – Landscape character	Development proposals that would impact upon landscape character, as defined by LANDMAP, must demonstrate through a landscape assessment how landscape character has influenced their design, scale, nature and site selection. Development will be permitted provided it would not have an unacceptable adverse effect on the special character or quality of Monmouthshire's landscape in terms of its visual, historic, geological, ecological or cultural aspects by: a) Causing significant visual intrusion; b) Causing significant adverse change in the character of the built or natural landscape; c) Being insensitively and unsympathetically sited within the landscape; d) Introducing or intensifying a use which is incompatible with its location; e) Failing to harmonise with, or enhance the landform and landscape; f) Losing or failing to incorporate important traditional features, patterns, structures and layout of settlements and landscapes of both the built and natural environment; and /or g) Respecting dark skies. Particular emphasis will be given to those landscapes identified through the LANDMAP Landscape Character Assessment as being of high and outstanding quality because of a certain landscape quality or combination of qualities.	There are no LSEs of this policy on European sites. This is a development management policy that safeguards the special character and quality of Monmouthshire's landscape. A range of criteria that proposals should satisfy are specified. While positive from a visual perspective, maintaining the wider landscape character has no direct relevance to European sites. The policy does not specify any quantum or location of housing and / or employment development. Overall, there are no impact pathways present and Policy LC1 is screened out from AA.

Policy	Text	Assessment
Policy LC2 – Blaenavon Industrial Landscape World Heritage Site	Development within or, in the vicinity of, the Blaenavon Industrial Landscape World Heritage Site (BILWHS) will only be permitted where it would: a) Preserve or enhance the landscape setting and character as defined through the LANDMAP process; Have no serious adverse effect on significant views into and out of the World Heritage site; Promote the standards of design in terms of distinctiveness, siting, mass, scale and materials that are sympathetic to, preserve or enhance the character of the local area. Development that would cause unacceptable harm to the outstanding universal values and unique character as set out in the BILWHS Management Plan that justify the designation of the World Heritage Site, or its setting, will not be permitted.	There are no LSEs of this policy on European sites. This is a development management policy that protects the Blaenavon Industrial Landscape World Heritage Site. However, maintaining this site has no bearing on European sites. The policy does not specify any quantum or location of housing and / or employment development. Overall, there are no impact pathways present and Policy LC2 is screened out from AA.
Policy LC3 – Bannau Brycheiniog National Park	Development in the vicinity of the Bannau Brycheiniog National Park will only be permitted where it would: a) Preserve or enhance the landscape setting, as defined through the LANDMAP process; Have no serious adverse effect on significant views into and out of the National Park. Have no adverse impact on the International Dark Skies Reserve designation. Development that would cause unacceptable harm to the qualities that justify the designation of the Bannau Brycheiniog National Park or its setting will not be permitted.	There are no LSEs of this policy on European sites. This is a development management policy that prevents development in the vicinity of the Bannau Brycheiniog National Park, unless certain criteria are fulfilled. However, protecting this National Park has no direct bearing on European sites. The policy does not specify any quantum or location of housing and / or employment development. Overall, there are no impact pathways present and Policy LC3 is screened out from AA.

Policy	Text	Assessment
Policy LC4 – Wye Valley National Landscape (AONB)	Within the Wye Valley National Landscape (AONB), any development must be subservient to the primary purpose to conserve and enhance the natural beauty of the area. In considering development proposals regard will be given to: a) The long term effect of the proposal, and the degree to which its nature and intensity is compatible with the character, purpose and overall management of the National Landscape (AONB); The degree to which design, quality and use of appropriate materials harmonise with the surrounding landscape and built heritage; The extent of the landscaping proposed; The need to protect features in the landscape identified as important through LANDMAP; The extent to which a proposed new building or use will generate additional traffic and the requirement for improvement of existing roads and lanes, including the surfacing of green lanes; The impact of the proposed development upon nature conservation interests. Development proposals that are outside the National Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted.	There are no LSEs of this policy on European sites. This is a development management policy that secures the natural beauty of the Wye Valley National Landscape AONB. Regard should be given to a range of factors, such as sensitive design and additional traffic. However, while protection of this AONB is generally positive, it has no direct relevance for European sites. The policy does not specify any quantum or location of housing and / or employment development. Overall, there are no impact pathways present and Policy LC4 is screened out from AA.

Policy	Text	Assessment
Policy LC5 – Dark Skies and Lighting	Development proposals involving external lighting must include appropriate lighting details and where proportionate a strategy to ensure: a) Lighting is necessary for the development; The proposed lighting and associated infrastructure is the minimum required; Light spillage is minimised; The prevention of glare and respect for the amenity of neighbouring land uses; The visual and landscape character of the built and natural environment is not unacceptably affected; In open countryside locations dark skies are retained; Potential adverse impacts on biodiversity and ecological connectivity are minimised; and Cumulative and in-combination lighting impacts are avoided.	There are no LSEs of this policy on European sites. This is a development management policy that requires planning proposals to consider lighting, such as installing a minimum of external lighting and minimising light spillage. It also specifies that adverse impacts on biodiversity should be minimised. This policy is particularly positive for qualifying bats from the Usk Bat Sites SAC and the Wye Valley and Forest of Dean Bat Sites SAC. Minimising potential light spillage is important for ensuring that bats can successfully move along commuting routes between roosts and foraging areas. The policy does not specify any quantum or location of housing and / or employment development. Overall, there are no impact pathways present and Policy LC5 is screened out from AA.

Policy	Text	Assessment
Policy NR1 – Nature Recovery and Geodiversity	Where biodiversity or ecosystem resilience could be impacted by a development proposal, applications must be accompanied by an ecological survey and assessment of the likely impact of the proposal on locally designated site(s) and functionally linked land, species or habitat(s) and shall make appropriate provision for their safeguarding and delivery of net benefit for biodiversity. Development proposals in sites containing protected species or habitats which are defined as irreplaceable by PPW12 are unacceptable. Development proposals that are likely to damage a locally designated site of biodiversity and / or geological importance, or a site that satisfies the relevant designation criteria, or the continued viability of priority habitats and species, or Section 7 list of species and habitats, will only be permitted where: a) The need for the development clearly outweighs the biodiversity, ecosystem resilience or geological importance of the site; and It can be demonstrated that the development cannot reasonably be located elsewhere. Where development addresses criteria a) and b), 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 on-site and where not possible, off-site. Where appropriate, long-term management and maintenance of biodiversity must be secured. Development proposals must deliver net benefit for biodiversity and ecosystem resilience and will be expected to: Maintain, incorporate, and enhance existing semi-natural habitats, linear habitat features, the ecological connectivity between them, other features of nature conservation interest and geological features. These must be safeguarded during construction work. Incorporate locally appropriate, climate resilient, native, and local provenance vegetation in any landscaping or planting scheme, except where special requirements in terms of purpose or location may dictate otherwise. Ensure the protection and enhancement of biodiversity and landscape resources through appropriate building design, site layouts, retention of dark corridors, landscaping techniques and choice of plant species. Where appropriate, make provision for on-going maintenance of retained or created nature conservation interests.	There are no LSEs of this policy on European sites. This is a development management policy that protects biodiversity and ecosystem resilience across Monmouthshire. It requires applications to undertake ecological surveys both in relation to locally designated sites and functionally linked land. Furthermore, where impacts on biodiversity are likely to occur, avoidance or mitigation measures will be needed to address unavoidable harm. It also specifies that a need benefit for biodiversity must be delivered, such as by maintaining, incorporating and enhancing semi-natural habitats, linear habitat features and ecological connectivity between them. While the policy does not explicitly refer to European sites, it is considered that it provides a positive framework for their protection. The policy does not specify any quantum or location of housing and / or employment development. Overall, there are no impact pathways present and Policy NR1 is screened out from AA.

Policy	Text	Assessment
Policy NR2 – Severn Estuary Recreational Pressure	Development proposals that would result in an increase in visitor pressure on features of the Severn Estuary SAC, SPA, Ramsar site, or Functionally Linked Land will not be supported unless it can be demonstrated that no adverse impact on the integrity of the European Marine Site will occur.	There are no LSEs of this policy on European sites. This is a development management policy that explicitly protects the integrity of the Severn Estuary SAC / SPA / Ramsar from adverse impacts associated with recreational pressure. Recreational pressure is identified as one of the key pressures on the SAC / SPA / Ramsar in Natural England's SIP. Ensuring that the integrity of the site is protected, such as through delivery of adequate mitigation measures, is one of the key HRA-relevant policy mechanisms in the LP. The policy does not specify any quantum or location of housing and / or employment development. Overall, there are no impact pathways present and Policy NR2 is screened out from AA.

Policy	Text	Assessment
Policy NR3 – Protection of Water Sources and the Water Environment	Development, which may impact upon the water environment and associated land, will only be permitted where it: a) Would not harm or pose an unacceptable risk to the capacity or flow of groundwater, surface water or coastal water systems; Would not harm or pose an unacceptable risk to the quality and quantity of ground waters, surface waters, wetlands or coastal water systems including, where appropriate, their ecological and amenity value; and Where practicable and reasonable, improves water quality,	There are no LSEs of this policy on European sites. This is a development management policy that prevents planning proposals from negatively impacting the water environment. The policy extends protection to the quality and quantity of groundwater and surfaces water. This is a key policy that protects the integrity of the River Wye SAC, River Usk SAC and Severn Estuary SAC / SPA / Ramsar, all of which are directly or indirectly to a deterioration in water quality and reduced hydrological flows. Of particular importance in this context is the phosphorus neutrality requirement in parts of the catchment of the River Wye and River Usk, which will need to be adhered to as a result of this policy. The policy does not specify any quantum or location of housing and / or employment development. Overall, there are no impact pathways present and Policy NR3 is screened out from AA.

Policy	Text	Assessment
Policy PROW1 – Public Rights of Way	Any Public Rights of Way (PROW) affected by a development proposal will require retention or a successful Path Order to either move the PROW on to a suitable alternative or to extinguish the PROW. Any predicted adverse impacts on the character, safety, enjoyment and convenient use of a PROW must be mitigated. Provision of additional routes where appropriate, will be sought in new developments with linkages to the existing network.	There are no LSEs of this policy on European sites. This is a development management policy that requires PRoWs to be retained by development proposals or a Path Order to be obtained for their rerouting / removal. Furthermore, additional routes will be sought in new developments. Generally, the retention of or provision of new PRoWs is positive because it will ensure that Monmouthshire continues to be served by a suite of recreational assets. The policy does not specify any quantum or location of housing and / or employment development. Overall, there are no impact pathways present and Policy PROW1 is screened out from AA.

Policy	Text	Assessment
Infrastructure		
Strategic Policy S6 – Infrastructure	Where existing infrastructure is inadequate to serve the proposed development, new or improved infrastructure and facilities must be provided as part of the proposed development to mitigate any likely adverse impacts. Where possible, infrastructure improvements should be provided prior to occupation. Where provision on-site is not appropriate, off-site provision, or a financial contribution towards it, will be sought. Arrangements will be required towards the future management and maintenance of facilities provided, either in the form of initial support or in perpetuity, including the use of management companies where appropriate. Planning agreements and obligations will be sought to secure improvements in infrastructure, facilities, services and related works, where they are necessary to make development acceptable. In identifying appropriate contributions, due regard will be paid to the overall development viability, including the cost of measures that are necessary to physically deliver a development and ensure that it is acceptable in planning terms. The requirements for such agreements/obligations will include consideration and appropriate provision of: • Affordable housing • Education facilities and/or required improvements • Sustainable transport measures • Transport infrastructure • Recreation and leisure facilities including formal and informal open space • Green and blue infrastructure • Community and cultural facilities • Welsh language including Welsh language facilities • Ecological mitigation and enhancement • Strategic utilities including water and sewerage infrastructure • Waste management facilities • Health infrastructure and/or facilities In the event that viability considerations indicate that not all the identified contributions can be reasonably required, priority contributions will be determined on the basis of the individual circumstances of each case. In the case of residential developments, priority will be given to the affordable housing requirement set out in Policy S7 unless there is an overwhelming need for the contribution, in whole or in part, to be allocated for other necessary purpose/s.	There are no LSEs of this policy on European sites. This is a development management policy that ensures the necessary infrastructure is in place to meet the requirements of new developments. Planning agreements and obligations will be sought to secure the appropriate provision of a diverse range of infrastructure, including sustainable transport measures, recreation facilities, green / blue infrastructure and water / sewerage provision. This is an important policy mechanism that helps protect the integrity of European sites that are sensitive to recreational pressure and water quality changes. For example, the policy will ensure that sufficient headroom is available at the relevant WwTWs to accommodate the increase in sewage produced as a result of the Monmouthshire LP. The policy does not specify any quantum or location of housing and / or employment development. Overall, there are no impact pathways present and Strategic Policy S6 is screened out from AA.

Policy	Text	Assessment
Policy IN1– Telecommunication, broadband and other digital infrastructure	Telecommunication, broadband and other digital infrastructure proposals will be considered in light of technical and operational requirements and permitted where the following criteria are met: a) The development relates to planned development/provision of a wider network; The siting and appearance of the proposed apparatus and associated structures should seek to minimise impact on the visual amenity, character and appearance of the surrounding area and, the amenity of neighbouring residents; There would be no significant adverse impact on the built or natural heritage or, the historic environment. Particular care should be given in the Wye Valley National Landscape (AONB) and adjacent the Bannau Brycheiniog National Park (BBNP); The application is accompanied by evidence of compliance with Government guidelines on health impacts of telecommunications infrastructure. Where new apparatus/structures are proposed, the application is accompanied by evidence that explores opportunities to utilise existing buildings, masts or structures in the first instance, and provides justification of why the application location is necessary.	There are no LSEs of this policy on European sites. This is a development management policy that considers the delivery of telecommunication, broadband and other digital infrastructure proposals provided that a range of criteria are met. However, the mere consideration of such proposals has no direct bearing on European sites. The policy does not specify any quantum or location of housing and / or employment development. Overall, there are no impact pathways present and Strategic Policy IN1 is screened out from AA.

Policy	Text	Assessment
New Housing		
Policy H1 – Residential Development in Primary and Secondary Settlements	Settlement boundaries have been drawn for the following Primary and Secondary Settlements identified in Policy S2: **Primary Settlements** • Abergavenny (inc. Llanfoist) • Chepstow • Monmouth (inc. Wyesham) • Caldicot (inc. Severnside area comprising of: Caerwent, Crick, Magor Undy, Portskewett, Rogiet and Sudbrook) **Secondary Settlements** • Penperlleni • Raglan • Usk Within the settlement boundaries new build residential development / redevelopment or conversion to residential, or subdivision of large dwellings or reuse of accommodation, such as upper vacant floors in town centres for residential use, will be permitted subject to detailed planning considerations and other policies of the RLDP that seek to protect existing retail, employment, community uses and tourism.	Likely Significant Effects on European sites cannot be excluded. This policy identifies the settlement boundaries for Primary Settlements and Secondary Settlements in which new residential development will be permitted. In conjunction with Strategic Policy 2, the location of new residential development is a key factor in determining the magnitude of negative impact pathways linking to specific European sites. **Potential impact pathways are present:** • **Atmospheric pollution** • **Recreational pressure** • **Loss of functionally linked land** • **Water quality** • **Water quantity, level and flow** Due to these potential linking impact pathways Policy H1 is screened in for Appropriate Assessment.

Policy	Text	Assessment
Policy H2 – Residential Development in Main Rural Settlements	Settlement boundaries have been drawn for the following Main Rural Settlements identified in Policy S2: • Devauden • Dingestow • Little Mill • Llandogo • Llanellen • Llangybi • Llanover • Llanvair Discoed • Mathern • Pwllmeyric • Shirenewton/ Mynyddbach • St Arvans • Tintern • Trellech • Werngifford/Pandy Within the Settlement Boundaries of Main Rural Settlements planning permission will be granted for new residential development/redevelopment, or conversion to residential, or sub-division of large dwellings, subject to detailed planning considerations, including no unacceptable adverse impact on village form and character and surrounding landscape, and other policies of the RLDP that seek to protect existing retail, employment, community uses and tourism.	Likely Significant Effects on European sites cannot be excluded. This policy identifies the settlement boundaries for Main Rural Settlements in which new residential development will be supported. In conjunction with Strategic Policy 2, the location of new residential development is a key factor in determining the magnitude of negative impact pathways linking to specific European sites. **Potential impact pathways are present:** • **Atmospheric pollution** • **Recreational pressure** • **Loss of functionally linked land** • **Water quality** • **Water quantity, level and flow** Due to these potential linking impact pathways Policy H2 is screened in for Appropriate Assessment.

Policy	Text	Assessment
Policy H3 – Residential Development in Minor Rural Settlements	In the following Minor Rural Settlements planning permission will be granted for minor small scale rounding off or infilling of a small gap between existing buildings, of no more than 1 or 2 dwellings, or residential redevelopment, or conversion to residential or sub-division of large dwellings, subject to detailed planning considerations, including no unacceptable adverse impact on village form and character and surrounding landscape, and other policies of the RLDP that seek to protect existing retail, employment, community uses and tourism. Minor Rural Settlements: • Bettws Newydd • Broadstone /Catbrook • Brynygwenin • Coed y Paen • Cross Ash • Cuckoo's Row • Great Oak • Grosmont • Gwehelog • Llanarth • Llanddewi Rhydderch • Llandegveth • Llandenny • Llangwm • Llanishen • Llansoy • Llantilio Crossenny • Llantrisant • Llanvair Kilgeddin • Llanvapley • Mitchel Troy • Penallt • Penpergwm • The Bryn • The Narth • Tredunnock	Likely Significant Effects on European sites cannot be excluded. This policy identifies Minor Rural Settlements in which small scale residential development will be supported. In conjunction with Strategic Policy 2, the location of new residential development is a key factor in determining the magnitude of negative impact pathways linking to specific European sites. **Potential impact pathways are present:** • **Atmospheric pollution** • **Recreational pressure** • **Loss of functionally linked land** • **Water quality** • **Water quantity, level and flow** Due to these potential linking impact pathways Policy H3 is screened in for Appropriate Assessment.

Policy	Text	Assessment
Policy H4 – Conversion/Rehabilitation of Buildings in the Open Countryside for Residential Use	The conversion / rehabilitation of a building in the open countryside for residential use will be permitted where all the following criteria are met: a) The form, bulk, materials and general design of the proposal, including any extensions, respect the rural character and design of the building; The proposal, including curtilage and access, is in scale and sympathy with the surrounding landscape and does not require the provision of unsightly infrastructure; Rebuilding works, necessitated by poor structural conditions and / or the need for new openings in walls, should not involve substantial reconstruction, with structural surveys being required for marginal cases; The more isolated and prominent the building, the more stringent will be the design requirements with regard to new door and window openings, extensions, means of access, service provision and garden curtilage, especially if located within the Wye Valley National Landscape (AONB); Buildings of modern and / or utilitarian construction and materials such as concrete block work, portal framed buildings clad in metal sheeting or buildings of substandard quality and / or incongruous appearance will not be considered favourably for residential conversion; and The building is capable of providing adequate living space within the structure. Only very modest extensions and ancillary buildings will be allowed having regard to the context and scale of the existing building and normal permitted development rights to extend further or to construct ancillary buildings will be withdrawn.	There are no LSEs of this policy on European sites. This is a development management policy that sets criteria for the refurbishment and conversion of existing rural buildings for residential use. While this policy does concern the enhancement of building to create residential space, the policy sets no quantum or allocation for any development. The policy does not specify any quantum or location of housing and / or employment development. Overall, there are no impact pathways present and Policy H4 is screened out from AA.
Policy H5 – Replacement Dwellings in the Countryside	The replacement of existing dwellings in the countryside will be permitted provided that: a) The original dwelling i) Is not a traditional farmhouse, cottage or other building that is important to the visual and intrinsic character of the landscape; ii) Has not been demolished, abandoned its residential use or fallen into such a state of disrepair so that it no longer has the appearance of a dwelling; b) The design of the new dwelling is of a form, bulk, size and scale that respects its setting; c) The proposal does not require an unacceptable extension to the existing residential curtilage; d) The replacement dwelling shall be of similar size to the replaced; and e) Any outbuildings should be modest in size and sensitively located and it can be demonstrated at the time of the original application that adequate ancillary garage and storage space can be achieved for the dwelling.	There are no LSEs of this policy on European sites. This is a development management policy that sets criteria for replacement of rural dwellings. The policy does not specify any quantum or location of housing and / or employment development. Overall, there are no impact pathways present and Policy H5 is screened out from AA.

Policy	Text	Assessment
Policy H6 – Extension of Rural Dwellings	In order to protect the character of the countryside, extensions to dwellings in the open countryside should be modest and respect or enhance the appearance of the existing dwelling. They will be required to: a) Be subordinate to the existing building; and b) Where the building is of a traditional nature, to respect its existing form, including the pattern and shape of openings, and materials.	There are no LSEs of this policy on European sites. This is a development management policy that sets criteria for extension of rural dwellings. The policy does not specify any quantum or location of housing and / or employment development. Overall, there are no impact pathways present and Policy H6 is screened out from AA.
Policy H7 – Specialist Housing	Proposals for specialist housing development, and extensions to established specialist housing facilities, will be permitted within or adjacent to defined settlement boundaries where: a) There is safe and convenient access to shops, services, community facilities and public transport appropriate to the needs of the intended occupiers; It is appropriate for its intended residents and the neighbourhood in terms of form, scale and design, type and affordability of the accommodation, as well as the provision of support and care; and It meets the affordable housing requirements of Policy S7 where the development falls within Use Class C3.	There are no LSEs of this policy on European sites. This is a development management policy that sets criteria for the development of specialist housing. The policy does not specify any quantum or location of housing and / or employment development. Overall, there are no impact pathways present and Policy H7 is screened out from AA.
Policy H8 – Housing Mix	To assist in addressing the demographic and affordability challenges in Monmouthshire, development proposals of 10 or more homes must include a range and mix of house types, tenure and size, to be agreed by the Council. Such development proposals must be accompanied by a statement setting out how the mix of market housing will assist in achieving balanced communities, including the site allocations included within the RLDP.	There are no LSEs of this policy on European sites. This is a development management policy that ensures there is a mix of housing tenure and size in new developments. The policy does not specify any quantum or location of housing and / or employment development. Overall, there are no impact pathways present and Policy H8 is screened out from AA.

Policy	Text	Assessment
Policy S7 – Affordable Housing	The affordable homes target for the Plan period of 2018 – 2033 is 1,595 – 2,000 homes. This will be delivered in accordance with the following framework: a) New site allocations – On-site provision of 50% affordable homes on all new site allocations. b) Sites of 20 homes and over – On-site provision of 50% affordable housing applies to development proposals on sites within existing settlement boundaries as identified in Tiers 1-3 of Strategic Policy S2. c) Sites of 5 to 19 homes – On-site provision of 40% affordable housing applies to development proposals on sites within existing settlement boundaries as identified in Tiers 1-3 of Strategic Policy S2. d) Sites of 1 to 4 homes – Financial contributions towards the provision of affordable housing in the local planning authority area will be required in accordance with details set out in the Affordable Housing Supplementary Planning Guidance. e) Conversions and sub-divisions – Financial contributions towards the provision of affordable housing in the local planning authority area will be required in accordance with details set out in Affordable Housing Supplementary Planning Guidance. In determining how many affordable homes should be provided on a development site, the figure resulting from applying the proportion required to the total number of dwellings will be rounded to the nearest whole number, where half rounds up. All proposals must meet national policy guidance in relation to the most efficient use of land and should not be subdivided or phased in an attempt to avoid on-site provision of affordable homes. This Strategic Policy applies to all residential planning applications. Exceptions will not be made for sites that previously had planning permission and have been resubmitted.	There are no LSEs of this policy on European sites. This is a development management policy that ensures housing is affordable. The policy does not specify any quantum or location of housing and / or employment development. Overall, there are no impact pathways present and Policy H8 is screened out from AA.

Policy	Text	Assessment
Policy H9 – Affordable Housing Exception Sites	Favourable consideration will be given to the siting of 100% affordable housing exception sites adjoining Tier 1, 2, 3 and 4 settlements identified in Strategic Policy S2, that would not otherwise be released for residential development provided that all of the following criteria are met: a) The scheme meets a genuine local need which could not otherwise be met within the locality; The proposed homes are of a size, tenure and design which is commensurate with the identified affordable housing need of the locality; The proposal relates to: i) 25 or less homes in Tier 1 Primary Settlements, ii) 15 homes or less in Tier 2 Secondary Settlements, iii) 10 homes or less in Tier 3 Main Rural Settlements or iv) 5 homes or less in Tier 4 Minor Rural Settlements; b) The site represents a logical extension to the existing settlement with no significant adverse impact on settlement form, character and surrounding landscape; The affordable housing meets the needs of local people and will be managed by a Registered Social Landlord (RSL) in perpetuity, which will be secured via a S.106 legal agreement. In exceptional circumstances where an RSL is not involved, clear and adequate legal agreements must be in place to ensure that the benefits of affordable housing will be secured for initial and subsequent occupiers.	There are no LSEs of this policy on European sites. This is a development management policy that favours the creation of affordable housing. This policy does not set any quanta or location for this development and is primarily concerned with the affordability of the dwellings, which has no bearing on their ecological impacts. The policy does not specify any quantum or location of housing and / or employment development. Overall, there are no impact pathways present and Policy H9 is screened out from AA.
Residential Allocations		

Policy	Text	Assessment
S8 – Site Allocation Placemaking Principles	All residential site allocations must comply with and incorporate the following placemaking principles into the schemes: Sustainable Communities • Creation of a high-quality and well-connected extension to the settlement, which responds to its edge of settlement location. Where appropriate, the layout will identify and respect key views to and from the wider landscape setting. • Provision of 50% affordable homes on-site comprising a mix of housing types and tenures to meet local need. • Dwellings built to net zero carbon standards, including the incorporation of renewable energy generation technologies and low carbon heating systems and ULEV charging points. • Provide a mix of house types, tenures, sizes, materials and colour to be developed at an appropriate density. • Broadband /digital infrastructure must be provided to serve each new home. Green Infrastructure, Landscape and Nature Recovery • Make provision within the development for appropriate green infrastructure, multifunctional streetscapes and useable public open space in accordance with National Policy and agreed standards, including play and recreation provision, community growing opportunities and accessibility for all. • Demonstrate a proposal that is informed by the surrounding landscape character and reflects the distinctive landscape character, qualities and sensitivities of the area. • Take a proactive approach to deliver a net benefit for biodiversity and ecosystem resilience within the development site by maintaining, incorporating and enhancing semi-natural habitats and ecological connectivity between them. • Ensure the protection and enhancement of biodiversity through appropriate building design, site layouts, lighting proposals that retain dark corridors, landscaping techniques and choice of plant species. • Ensure that trees, woodland and hedgerows along site boundaries and within the site are retained and protected as far as possible with adequate space to allow access for maintenance and to maintain functional and viable wildlife corridors and green infrastructure assets. Sustainable Travel and Highways	There are no LSEs of this policy on European sites. This is a development management policy that does not set any quanta or location for this development and is primarily concerned with the affordability of the dwellings, which has no bearing on their ecological impacts. The policy does not specify any quantum or location of housing and / or employment development. Overall, there are no impact pathways present and Policy H9 is screened out from AA.

Policy	Text	Assessment
	• Design of the site and its connections must prioritise active travel to local trip attractors and public transport, in line with the Sustainable Transport Hierarchy (PPW12/Wales Transport Strategy). Active Travel Act guidance should be applied to routes, facilities and sustainable transport promotion. • Sites must contribute to active travel and public transport improvements as necessary. • Ensure that the development does not adversely affect the safety, capacity and operation of the highway network. • Streets must be designed and built to adoption standards in accordance with national and local design standards and offered for adoption pursuant to the requisite highway adoption agreements. Education Requirements • Sites must contribute to primary and secondary school provision in the area in accordance with capacity requirements. Residential amenity • Ensure a safe, secure, pleasant and accessible environment for all members of the community. • Maintain reasonable levels of privacy and amenity of occupiers of neighbouring properties. • Incorporate satisfactory air quality measures for mitigating and/or reducing emissions, as appropriate. • Incorporate good acoustic design which must be compatible with thermal comfort by ensuring adequate ventilation and avoidance of overheating, in the interests of protecting residents from the harmful effects of noise. Flood Risk and Sustainable Drainage Systems • Potential flood risk to, or as a consequence of, the development of the site must be suitably assessed in accordance with national planning policy. • The development must manage surface water through a sustainable drainage system in accordance with Welsh Government's Statutory Standards for Sustainable Drainage Systems 2018. The distribution of SuDS features across the site should be prioritised, reducing the size of any single SuDS feature. Site specific considerations are set out in Policies HA1 to HA18.	

<table>
<tr><th>Policy</th><th>Text</th><th>Assessment</th></tr>
<tr>
<td>Policy HA1 - Land to the East of Abergavenny</td>
<td>
Allocated as a residential-led mixed-use development

Development of the site should accord with the following parameters, placemaking principles and development requirements, which should be delivered in an appropriately phased manner and be formally tied to planning consents.

<table>
<tr><th>Site Area</th><th>Allocation Type</th><th>Total Homes</th></tr>
<tr><td>Total Site: 35.9 ha</td><td>Strategic Mixed-use Development including:
• Residential
• Mixed -use Commercial Hu
• Park & Rid
• B Use Class Uses</td><td>Approx No. of Homes: 500
Open Market: 250
Affordable Homes: 250</td></tr>
</table>

*Within the Plan period

In addition to the Placemaking Principles identified in Policy S8, the site must comply with the following:

Sustainable Communities

a) To provide a mixed-use development containing the following key uses:
• Approximately 500 homes including 50% affordable homes.
• A minimum 1 hectare of B1 Use Class uses.
• A neighbourhood centre, the uses and scale of which to be agreed by MCC.
• Green infrastructure and open space provision, including allotments/community food growing spaces, incorporating the creation of focal points for the community.
• Park and ride facility serving Abergavenny Railway Station.
• Active travel connections with visible, prioritised routes to/from the site to the Railway Station and Abergavenny.

b) The completion of non-residential elements must be delivered in line with an agreed phasing programme.
</td>
<td>
Likely Significant Effects on European sites cannot be excluded.

This policy allocates a 35.9ha large site on Land to the East of Abergavenny for residential-led mixed-use development, including the delivery of 500 homes.

Importantly, the policy also specifies that the development proposal will need to comply with a number of provisions, including the protection of Green Infrastructure assets, retention of hedgerows as viable wildlife corridors, incorporating / enhancing existing PRoWs and sustainable travel (e.g. walking / cycling links). These measures have the potential to mitigate some of the impact pathways identified below.

Potential impact pathways are present:
• Atmospheric pollution
• Recreational pressure
• Loss of functionally linked land
• Water quality
• Water quantity, level and flow

Due to these potential linking impact pathways Policy HA1 is screened in for Appropriate Assessment.
</td>
</tr>
</table>

Policy	Text	Assessment
	c) The site design and masterplanning should create an exemplar of residential and GI-led placemaking, establishing clear parameters and principles to be followed by site developers. d) A balanced approach to densities should be provided that makes efficient use of land and reflects the character of historic Abergavenny and enhances Abergavenny Conservation Area while also respecting the character of the surrounding landscape. e) Higher densities should be focussed on western and central locations and towards key attractors such as the mixed-use centre and Railway Station. Lower density development may be appropriate along the eastern boundary to retain the visual and physical integrity of the urban/countryside edge and maintain the distinct landscape character of Abergavenny. f) Densities and layout should respect the changes in levels within the site. **Green Infrastructure, Landscape, and Nature Recovery** g) Site design and layout should include opportunities to capture views of the wider landscape including the Bannau Brycheiniog National Park (BBNP), Usk Valley and Blaenavon Industrial Landscape World Heritage Site. h) Development must ensure the retention and protection of substantial GI assets as far as possible, including retaining and enhancing tributaries of the River Gavenny. i) Hedgerows along the site boundary should be retained with adequate space to allow access for maintenance and to maintain functional and viable wildlife corridors. j) Provision of an appropriate design response and interface between the western edge of the development and the A465 corridor that respects the importance of the visual connectivity between the site and existing settlement and is in keeping with the distinct character of Abergavenny. k) Any tree loss associated with the redesign of the A465 corridor must be subject to appropriate compensatory planting. **Sustainable Travel & Highways** l) A connectivity strategy setting out the number, location form and delivery of connectivity points between the site and existing settlement of Abergavenny will be agreed with the Local Planning Authority. The strategy will include changes to the character and environment of the A465 to provide safe and accessible crossings and means of access(s) and appropriate crossings over the railway line. m) Off-site highway infrastructure improvements must be delivered as necessary, having regard to requirements arising from the Transport Assessment and including:	

Policy	Text	Assessment
	• An agreement with the Highway Authority for the proposed accesses and junction on to the A465. • Emergency secondary access on to Garth Road. n) Make provision for good quality, safe, legible and accessible pedestrian and cycle linkages to key access points including linkages to the local schools, Abergavenny town centre and bus transport services. o) Incorporate and enhance the existing Public Right of Way footpaths as key connection routes running through the site linking up with wider Abergavenny and as a through route to the wider countryside. p) Make provision for a bus link into the site design and a financial contribution towards improved public transport and bus frequency. **Air Quality** q) Incorporate satisfactory air quality measures for mitigating and/or reducing emissions. Particular regard should be given to the potential impact on Merthyr Road Bridge/Waitrose roundabout. **A masterplan establishing key design and placemaking parameters is being prepared and will be agreed with the Local Planning Authority prior to the determination of any planning application.**	

<table>
<tr><th>Policy</th><th>Text</th><th>Assessment</th></tr>
<tr>
<td>Policy HA2 – Land to the East of Caldicot</td>
<td>
Allocated for a residential-led mixed-use development.

Development of the site should accord with the following parameters, placemaking principles and development requirements, which should be delivered in an appropriately phased manner and be formally tied to planning consents.

<table>
<tr><th>Site Area</th><th>Allocation Type</th><th>Total Homes</th></tr>
<tr><td>Circa 64ha</td><td>Strategic Mixed-Use Development including:
Residential
Primary School
Mixed use Local Centre
B1 Use Class Employment
Strategic public open space</td><td>Approx No. of Homes: 770
Open Market Homes: 385
Affordable Homes: 385</td></tr>
</table>

In addition to the Placemaking Principles identified in Policy S8, the site must comply with the following criteria below:

Sustainable Communities

a) Provision of a mixed-use development containing the following key uses:
• 770 homes including 50% affordable homes.
• Primary School.
• Strategic public open space, including community playing fields, allotments, community orchard and green infrastructure provision.
• A local centre including appropriate community facilities, the uses and scale of which to be agreed by MCC.
• A minimum of 1ha B1 Use Class employment land.

b) Crick Road must be incorporated into the site as an active street frontage providing cohesion and a gateway for the development as a whole.

c) The design and masterplanning of the site should create an exemplar of residential and GI-led placemaking, establishing clear parameters and principles to be followed by site developers.

d) The completion of non-residential elements must be delivered in line with an agreed phasing programme.
</td>
<td>
Likely Significant Effects on European sites cannot be excluded.

This policy allocates a 64ha large site on Land to the East of Caldicot for residential-led mixed-use development, including the delivery of 770 homes.

Importantly, the policy also specifies that the development proposal will need to comply with a number of provisions, including the provision of strategic public open space, consideration of the location and potential disturbance in relation to the Severn Estuary SAC / SPA / Ramsar, grassland and hedgerow restoration, provision of a lighting scheme and sustainable transport links. These measures have the potential to mitigate some of the impact pathways identified below.

Potential impact pathways are present:
• Atmospheric pollution
• Recreational pressure
• Loss of functionally linked land
• Water quality
• Water quantity, level and flow

Due to these potential linking impact pathways Policy HA2 is screened in for Appropriate Assessment.
</td>
</tr>
</table>

Policy	Text	Assessment
	Green Infrastructure, Landscape and Nature Recovery e) Development of the site to consider existing topography, assets, features and contours of the site and include measures to integrate development appropriately while reducing visual impact. Less dense development should be provided on the edge of the site. f) Development should consider and respond positively to the setting of the Grade II Listed Building, the Conservation Area, Country Park and views to the nearby Scheduled Ancient Monument. No built development will take place within these sensitive areas. g) Recognition of the impact the scale and location of the site on the Severn Estuary European Marine Site (EPS) and Nedern Brook Site of Special Scientific Interest (SSSI). Interface between the SSSI and built development (including areas of formal recreation) requires careful design to avoid increased disturbance to qualifying features. No built development or additional access/transport routes shall occur within the SSSI. h) The site is within the 7km Core Recreational Catchment Zone for the Severn Estuary European Marine Site and will be considered for a financial contribution as part of the Mitigation Strategy for the site. Green space design must consider any emerging guidance for Suitable Alternate Natural Greenspace (SANG) to reduce recreational pressure on the features of the Estuary. i) Mount Ballan SINC and other woodland areas will be retained and protected with an appropriate buffer. j) Include opportunities for grassland and hedgerow restoration, wetland creation and woodland connectivity that will be managed appropriately for protected species. k) Include opportunities for grassland area enhancement and enhanced native planting around ponds and wetland areas that will be managed appropriately for protected species. No built development will take place in the SSSI. l) The proposal will be accompanied by a lighting scheme. Dark corridors should be maintained and light spillage on to wildlife corridors is minimised, with particular reference to corridors and priority habitats used by bats and dormice present on the site. m) Public Rights of Way within the site must be incorporated into the site design and remain available for public use. **Sustainable Travel and Highways** n) The site must incorporate on and off-site measures to provide good quality, attractive, safe, legible and accessible pedestrian and cycle linkages both to and within the new development area. Key connections include an active travel route to Caldicot Town Centre. Connection should also be made to the former MoD railway cycle and walking route.	

Policy	Text	Assessment
	o) Provision of off-site highway infrastructure improvements as necessary, having regard to requirements arising from the Transport Assessment and including: • An agreement must be entered into with the Council to facilitate the construction of multiple development accesses along Crick Road and any necessary access points along the B4245 to the north of the site; • A minimum of a 2 metre footway for pedestrians over the site's frontages linking to existing footways; • Revision of speed limits along Crick Road to 20mph, the location of which to be agreed with MCC. • Provision of a public transport link to be provided along Crick Road and throughout the site, details of which to be agreed with MCC, including any necessary financial contributions to improve nearby infrastructure. **Flood Risk and Sustainable Drainage Systems** p) No built development will be permitted within the part of the site located in floodplain. **Other** q) Development must ensure adequate buffers are provided to take account of water mains intersecting the site. **A masterplan establishing key design and placemaking parameters is being prepared and will be agreed with the Local Planning Authority prior to the determination of any planning application.**	

<table>
<tr><th>Policy</th><th>Text</th><th>Assessment</th></tr>
<tr>
<td>Policy HA3 - Land at Mounton Road, Chepstow</td>
<td>
Allocated for a mixed-use residential scheme

Development of the site should accord with the following parameters, placemaking principles and development requirements, which should be delivered in an appropriately phased manner and be formally tied to planning consents.

<table>
<tr><th>Site Area</th><th>Allocation Type</th><th>Total Homes</th></tr>
<tr><td>12.8 ha</td><td>Strategic Mixed-Use:
Residential
Commercial uses such as Class C1 Hotel and Class C2 Residential care home</td><td>Approx No. of Homes: 146
Open Market Homes: 73
Affordable Homes: 73</td></tr>
</table>

In addition to the Placemaking Principles identified in Policy S8, the site must comply with the following criteria below:

Sustainable Communities
a) Creation of a high-quality well-connected extension, which responds to its edge of settlement location and to its gateway locality to Chepstow and Wye Valley National Landscape (AONB) setting.
b) A street hierarchy comprising a legible, permeable and connected network of street, footpaths and cycleways should be developed to inform the character of different parts of the site.
c) A focal tree-lined avenue should lead to the entrance of the community parkland from the A466 entrance point.
d) The non-residential element of the site to be delivered in line with an agreed phasing schedule.
e) The commercial uses of the development, which could include a hotel and care home are to be located in the north east focal/gateway point of the site.
f) An appropriate scale, massing, height and appearance of buildings, in particular the hotel and care-home, to respect the site’s location, character and residential amenity impact;
g) Provision of a publicly accessible Community Parkland, with a parkland character that respects the setting of the Grade II listed St Lawrence House and creates opportunities for recreation and leisure.
h) Provision of an appropriate design response and interface between the eastern edge of the development and the A466 road corridor.
</td>
<td>
Likely Significant Effects on European sites cannot be excluded.

This policy allocates a 12.8ha site on Land at Mounton Road for residential-led mixed-use development, including the delivery of 146 homes.

Importantly, the policy also specifies that the development proposal will need to comply with a number of provisions, including the protection of Green Infrastructure assets, retention of hedgerows as viable wildlife corridors, incorporating / enhancing existing PRoWs and sustainable travel (e.g. walking / cycling links). These measures have the potential to mitigate some of the impact pathways identified below.

Potential impact pathways are present:
• Atmospheric pollution
• Recreational pressure
• Loss of functionally linked land
• Water quality
• Water quantity, level and flow

Due to these potential linking impact pathways Policy HA3 is screened in for Appropriate Assessment.
</td>
</tr>
</table>

Policy	Text	Assessment
	i) Provision of an appropriate design response for the proximity and transition to the green wedge and wider landscape to the south and west of development in terms of lighting and built form. Green Infrastructure, Landscape and Nature Recovery j) Existing western and northern boundary hedgerow and woodland shall be retained, buffered and protected for a width of a minimum 30m and/or root protection area. Trees with TPOs and other mature trees will be retained and protected within the Community Parkland and managed appropriately to maintain biodiversity value. k) The site is within the 7km Core Recreational Catchment Zone for the Severn Estuary European Marine Site and will be considered for a financial contribution as part of the Mitigation Strategy for the site. Green space design must consider any emerging guidance for Suitable Alternate Natural Greenspace (SANG) to reduce recreational pressure on the features of the Estuary. l) Provision of a lighting strategy that considers and mitigates for visual impact on landscape character and setting and minimises light spillage on to wildlife corridors and habitats. Sustainable Travel and Highways m) Provision of on and off-site highways infrastructure improvements as necessary, having regard to requirements arising from the Transport Assessment and including: • A legal agreement for the proposed A466 primary access junction, footways, street lighting, crossing provision and the widening and improvement of the existing footway on the A466. • A legal agreement for the construction of off-site pedestrian/cycling improvements, including connections to bus stops in both directions, the National Cycle route and Chepstow's community hospital. • The layout in north west corner of the site will connect the proposal to the existing Public Right of Way 355/3/3 footpath. • Land to be safeguarded for potential future improvements to the Highbeech Roundabout. • Provision of a public transport link through the site, details of which to be agreed with MCC, including any necessary financial contributions to improve public transport services and nearby infrastructure. Residential Amenity n) The incorporation of satisfactory air quality measures for mitigating and/or reducing emissions. Development must not significantly worsen (either individually or cumulatively) any air pollution	

<table>
<tr><th>Policy</th><th>Text</th><th>Assessment</th></tr>
<tr><td></td><td>A masterplan establishing key design and placemaking parameters is being prepared and will be agreed with the Local Planning Authority prior to the determination of any planning application.</td><td></td></tr>
<tr><td>Policy HA4 – Land at Leasbrook, Monmouth</td><td>Allocated for residential development

Development of the site should accord with the following parameters, Placemaking Principles and Development Requirements, which should be delivered in an appropriately phased manner and be formally tied to planning consents.

<table>
<tr><th>Site Area</th><th>Allocation Type</th><th>Total Homes</th></tr>
<tr><td>11ha</td><td>Residential</td><td>Approx No. of Homes: 270
Open Market Homes: 135
Affordable Homes: 135</td></tr>
</table>

In addition to the Placemaking Principles identified in Policy S8, the site must comply with the following criteria below:

Sustainable Communities

a) Creation of a high-quality and well-connected extension to Monmouth, which responds to its edge of settlement location.

Green Infrastructure, Landscape and Nature Recovery

b) Development of the site to consider existing topography, assets, features and contours of the site and include measures to integrate development appropriately while reducing visual impact. Less dense development should be provided on the northern and eastern edge of the site.

c) Maintain and enhance populations of protected and priority species.

d) The proposal must be accompanied by a lighting scheme. Dark corridors should be maintained and light spillage on to wildlife corridors minimised, with particular regard to the Greater Horseshoe Bat Juvenile Sustenance Zone and corridors used by bats.

e) A S.106 agreement must be signed and include the requirement for additional woodland buffer planting with well-designed public access to be provided on the eastern edge of the site (in the blue line of ownership) to protect the Greater Horseshoe Bat Juvenile Sustenance Zone and the wider landscape character due to the site's proximity to the Dixton Conservation Area and Lower Wye Valley Landscape of Historic Interest. This is required in addition to any on-site GI provision.</td><td>Likely Significant Effects on European sites cannot be excluded.

This policy allocates a 11ha site on Land at Leasbrook for residential development, including the delivery of 270 homes.

Importantly, the policy also specifies that the development proposal will need to comply with a number of provisions, including the protection of Green Infrastructure assets, retention and buffering of significant trees, incorporating / enhancing existing PRoWs and sustainable travel (e.g. walking / cycling links). These measures have the potential to mitigate some of the impact pathways identified below.

Potential impact pathways are present:
• Atmospheric pollution
• Recreational pressure
• Loss of functionally linked land
• Water quality
• Water quantity, level and flow

Due to these potential linking impact pathways Policy HA4 is screened in for Appropriate Assessment.</td></tr>
</table>

Policy	Text	Assessment
	f) Protect, buffer and maintain existing TPO trees and significant trees by including within the Green Infrastructure provision and enhance by including new planting of native species of local provenance. **Sustainable Travel and Highways** g) Emergency vehicular access must be provided to connect to the A466 on Hereford Road to allow for a secondary means of access if required in an extreme flooding event. h) Provision of on and off-site measures must be delivered to provide good quality, attractive, safe, legible and accessible pedestrian and cycle linkages both to and within the new development area. Key connections include a footpath link to Dixton Close and along Dixton Road which allows links to further active travel routes in Monmouth. Sufficient space within the site boundary must also be included to allow the future provision of active travel route MCC-M25A(DL)4A. i) Provision of off-site highway infrastructure improvements as necessary, having regard to requirements arising from the Transport Assessment and including: • An agreement must be entered into with the Council for the facilitation of the construction of the development access; • The implementation of required off-site junction mitigation/ improvement measures as appropriate, details of which to be agreed with the Council; • Provision of a public transport link through the site, details of which to be agreed with the Council, including any necessary financial contributions to improve public transport services and nearby infrastructure. **Flood Risk and Sustainable Drainage Systems** j) Potential flood risk to, or as a consequence of, the development of the site must be suitably assessed in accordance with Welsh Government's Technical Advice Note (TAN) 15: Development and Flood Risk including consideration of flooding in extreme events on Dixton Road. **A masterplan establishing key design and placemaking parameters is being prepared and will be agreed with the Local Planning Authority prior to the determination of any planning application.**	

<table>
<tr><th>Policy</th><th>Text</th><th>Assessment</th></tr>
<tr>
<td>Policy HA5 – Land at Penlanlas Farm, Abergavenny</td>
<td>
Allocated for residential development

Development of the site should accord with the following parameters, Placemaking Principles and Development Requirements, which should be delivered in an appropriately phased manner and be formally tied to planning consents.

<table>
<tr><th>Site Area</th><th>Allocation Type</th><th>Total Homes</th></tr>
<tr><td>6.17ha</td><td>Residential</td><td>Approx No. of Homes: 100
Open Market Homes: 50
Affordable Homes: 50</td></tr>
</table>

In addition to the Placemaking Principles identified in Policy S8, the site must comply with the following:

Sustainable Communities

a) Incorporation of lower density development on the northern edge of the site and buffer zone to the north-west of the site to integrate it into the landscape.
b) Provision of allotments in the site.

Green Infrastructure, Landscape and Nature Recovery

c) Preserve or enhance the landscape setting of Bannau Brycheiniog National Park (BBNP) and have no adverse impact on the International Dark Skies Reserve designation.
d) Incorporate and enhance the existing Public Right of Way Footpath 91 running along the site's eastern boundary to include sufficient space to maintain existing and new hedgerows, green infrastructure assets, SuDS and public access.
e) Include opportunities for species rich grassland restoration and creation that will be managed appropriately.

Sustainable Travel and Highways

f) Provision of off-site highway infrastructure improvements as necessary, having regard to requirements arising from the Transport Assessment and including:
• An agreement with the Council to construct the development access and undertake off-site works to widen Old Hereford Road and necessary pedestrian/cycling improvements and reduce the speed limit on Old Hereford Road.
</td>
<td>
Likely Significant Effects on European sites cannot be excluded.

This policy allocates a 6.17ha site on Land at Penlanlas Farm for residential development, including the delivery of 100 homes.

Importantly, the policy also specifies that the development proposal will need to comply with a number of provisions, including the protection of Green Infrastructure assets, creation or restoration of species rich grassland, incorporating / enhancing existing PRoWs and sustainable travel (e.g. walking / cycling links). These measures have the potential to mitigate some of the impact pathways identified below.

Potential impact pathways are present:
• Atmospheric pollution
• Recreational pressure
• Loss of functionally linked land
• Water quality
• Water quantity, level and flow

Due to these potential linking impact pathways Policy HA5 is screened in for Appropriate Assessment.
</td>
</tr>
</table>

Policy	Text	Assessment
	• Financial contributions to improve public transport services and nearby • infrastructure. g) Provision of good quality, safe, legible and accessible pedestrian and cycle linkages to key access points including the north-eastern corner of the site, south- eastern corner of the site and Old Hereford Road. **Residential Amenity** h) The incorporation of satisfactory air quality measures for mitigating and/or reducing emissions. Development must not significantly worsen (either individually or cumulatively) any air pollution emissions in areas where pollution levels are close to their objective or limit value levels, nor result in a breach of an air quality objective or limit value.	

<table>
<tr><th>Policy</th><th>Text</th><th>Assessment</th></tr>
<tr>
<td>Policy HA6 – Land at Rockfield Road, Monmouth</td>
<td>
Allocated for residential development

Development of the site should accord with the following parameters, Placemaking Principles and Development Requirements, which should be delivered in an appropriately phased manner and be formally tied to planning consents.
<table>
<tr><th>Site Area</th><th>Allocation Type</th><th>Total Homes</th></tr>
<tr><td>1.5ha</td><td>Residential</td><td>Approx No. of Homes: 60
Open Market Homes: 30
Affordable Homes: 30</td></tr>
</table>

In addition to the Placemaking Principles identified in Policy S8, the site must comply with the following:

Green Infrastructure, Landscape and Nature Recovery
a) Include opportunities for grassland and hedgerow restoration, with appropriate buffers that ensure features can be managed appropriately for protected species including dormouse.
b) Provision of a lighting strategy that considers and mitigates for visual impact on landscape character and setting and minimises light spillage on to wildlife corridors and habitats, with particular reference to corridors used by horseshoe bats.
c) Ensure that PROW 375/127 is linked to development and has adequate space provided to accommodate active travel provision, public realm and hedgerows.

Sustainable Travel and Highways
d) Provision of access to the development and off-site highway improvements that are deemed necessary are subject to the approval and agreement of the Highway Authority.
e) Financial contributions are required to improve public transport services and nearby infrastructure.
</td>
<td>
Likely Significant Effects on European sites cannot be excluded.

This policy allocates a 1.5ha site on Land at Rockfield Road for residential development, including the delivery of 60 homes.

Importantly, the policy also specifies that the development proposal will need to comply with a number of provisions, including opportunities for grassland and hedgerow restoration and providing space for active travel, public realm and hedgerows. These measures have the potential to mitigate some of the impact pathways identified below.

Potential impact pathways are present:
• Atmospheric pollution
• Recreational pressure
• Loss of functionally linked land
• Water quality
• Water quantity, level and flow

Due to these potential linking impact pathways Policy HA6 is screened in for Appropriate Assessment.
</td>
</tr>
</table>

<table>
<tr><th>Policy</th><th>Text</th><th>Assessment</th></tr>
<tr>
<td>Policy HA7 – Land at Drewen Farm, Monmouth</td>
<td>
Allocated for residential development

Development of the site should accord with the following parameters, Placemaking Principles and Development Requirements, which should be delivered in an appropriately phased manner and be formally tied to planning consents.

<table>
<tr><th>Site Area</th><th>Allocation Type</th><th>Total Homes</th></tr>
<tr><td>6.6ha</td><td>Residential</td><td>Approx No. of Homes: 110
Open Market Homes: 55
Affordable Homes: 55</td></tr>
</table>

In addition to the Placemaking Principles identified in Policy S8, the site must comply with the following:

Sustainable Communities

a) Incorporation of lower densities along the boundaries of the open countryside responding to its edge of settlement location.

Green Infrastructure, Landscape and Nature Recovery

b) Existing boundary features to be enhanced with additional hedgerow and tree planting to mitigate for development and respond to its edge of settlement location.

c) Requirement of additional GI connectivity and buffers between sensitive habitats and built development, and areas adjacent to the Wonastow Field SINC.

Sustainable Travel and Highways

d) Provision of on and off-site measures to provide good quality, attractive, safe, legible and accessible pedestrian and cycle linkages both to and within the new development area. Key connections include PROW MCC-M17B, future PROW route MCC-M17A along Watery Lane and into the adjacent Kingswood Gate site allowing links to further active travel routes in Monmouth.

e) Provision of access to the development and off-site highway improvements that are deemed necessary are subject to the approval and agreement of the Highway Authority.

f) Financial contributions are required to improve public transport services and nearby infrastructure.
</td>
<td>
Likely Significant Effects on European sites cannot be excluded.

This policy allocates a 6.6ha site on Land at Drewen Farm for residential development, including the delivery of 110 homes.

Importantly, the policy also specifies that the development proposal will need to comply with a number of provisions, including the protection of Green Infrastructure assets, enhanced green infrastructure connectivity and buffers, and additional hedgerow and tree planting. These measures have the potential to mitigate some of the impact pathways identified below.

Potential impact pathways are present:
• Atmospheric pollution
• Recreational pressure
• Loss of functionally linked land
• Water quality
• Water quantity, level and flow

Due to these potential linking impact pathways Policy HA7 is screened in for Appropriate Assessment.
</td>
</tr>
</table>

<table>
<tr><th>Policy</th><th>Text</th><th>Assessment</th></tr>
<tr>
<td>Policy HA8 – Land at Tudor Road, Wyesham, Monmouth</td>
<td>
Allocated for residential development

Development of the site should accord with the following parameters, Placemaking Principles and Development Requirements, which should be delivered in an appropriately phased manner and be formally tied to planning consents.

<table>
<tr><th>Site Area</th><th>Allocation Type</th><th>Total Homes</th></tr>
<tr><td>2.1ha</td><td>Residential</td><td>Approx. Number of Homes: 50
Open Market Homes: 25
Affordable Homes: 25</td></tr>
</table>

In addition to the Placemaking Principles identified in Policy S8, the site must comply with the following:

Sustainable Communities

a) A mix of house types, tenure and size with lower densities on the edge of the site adjacent to the boundary of the Wye Valley National Landscape (AONB).

Green Infrastructure, Landscape and Nature Recovery

b) Development of the site to consider existing topography, assets, features and contours of the site and include measures to integrate development appropriately while reducing visual impact.
c) Protect, buffer and maintain existing trees and hedgerows, on site boundaries and central linear features, by including within the Green Infrastructure provision and enhance to provide both a buffer and enhanced green corridor.
d) Appropriate buffer planting to be included to enhance and protect linear features used by foraging and commuting bats associated with the Wye Valley and Forest of Dean Bat Sites SAC.
e) Provision of a lighting strategy that considers and mitigates for visual impact on landscape character and setting and minimises light spillage on to wildlife corridors and habitats, including corridors used by bats.
f) An area of public open space to be included within the site boundary in the south eastern corner of the site.

Sustainable Travel and Highways
</td>
<td>
Likely Significant Effects on European sites cannot be excluded.

This policy allocates a 2.1ha site on Land at Tudor Road for residential development, including the delivery of 50 homes.

Importantly, the policy also specifies that the development proposal will need to comply with a number of provisions, including the protection of Green Infrastructure assets, appropriate buffer planting to enhance or protect linear features, incorporating / enhancing existing PRoWs and sustainable travel (e.g. walking / cycling links). These measures have the potential to mitigate some of the impact pathways identified below.

Potential impact pathways are present:
• Atmospheric pollution
• Recreational pressure
• Loss of functionally linked land
• Water quality
• Water quantity, level and flow

Due to these potential linking impact pathways Policy HA8 is screened in for Appropriate Assessment.
</td>
</tr>
</table>

Policy	Text	Assessment
	g) Provision of on and off-site measures to provide good quality, attractive, safe, legible and accessible pedestrian and cycle linkages both to and within the new development area. Key connections include to the nearby active travel route MCC-M14A, which allows links to further active travel routes in Monmouth. h) Provision of the development's primary access involving re-engineering of the existing Tudor Road junction, providing access to 7 – 19 Tudor Road, garage block and forecourt along with relocation of the associated residents' off-street parking. i) Provision of off-site highway infrastructure improvements as necessary, having regard to requirements arising from the Transport Assessment and including: • An agreement must be entered into with the Council for the construction of the development access; • The implementation of required off-site junction mitigation/improvement measures as appropriate, details of which to be agreed with the Council; • Financial contributions to improve public transport services and nearby infrastructure, details of which to be agreed with the Council. **Flood Risk and Sustainable Drainage Systems** j) A scheme for the management of overland flows from the land above the site will need to be considered and incorporated into the site drainage.	

<table>
<tr><th>Policy</th><th>Text</th><th>Assessment</th></tr>
<tr>
<td>Policy HA9 – Land at former MOD Land, Caerwent</td>
<td>
Allocated for a mixed-use residential scheme

Development of the site should accord with the following parameters, placemaking principles and development requirements, which should be delivered in an appropriately phased manner and be formally tied to planning consents.

<table>
<tr><th>Site Area</th><th>Allocation Type</th><th>Total Homes</th></tr>
<tr><td>4.2ha</td><td>Mixed Use
Residential
Commercial B1</td><td>Approx No. of Homes: 40
Open Market Homes: 20
Affordable Homes: 20</td></tr>
</table>

In addition to the Placemaking Principles identified in Policy S8, the site must comply with the following:

Sustainable Communities

a) Provision of a mixed-use development of residential and commercial B1 uses with a minimum of 1ha for B1 employment land.
b) The non-residential element of the site to be delivered in line with an agreed phasing schedule.
c) Any proposed new commercial buildings must be of an appropriate scale, massing and height to respect the site’s character and edge of settlement setting and residential amenity impact.

Green Infrastructure, Landscape and Nature Recovery

d) Maintain and enhance populations of protected and priority species including reptiles, dormouse, and the lesser horseshoe maternity roost through retention of existing habitat and appropriate buffer planting.
e) Appropriate buffer and boundary treatments to the north of the site must be considered.
f) Provision of a lighting strategy that considers and mitigates for visual impact on landscape character and setting and minimises light spillage on to wildlife corridors and habitats, including corridors used by bats and dormice present on the site.
g) The site is within the 7km Core Recreational Catchment Zone for the Severn Estuary European Marine Site and will be considered for a financial contribution as part of the Mitigation Strategy for the site. Green space design must consider any emerging guidance for Suitable Alternate Natural Greenspace (SANG) to reduce recreational pressure on the features of the estuary.
</td>
<td>
Likely Significant Effects on European sites cannot be excluded.

This policy allocates a 4.2ha site on Land at former MOD Land for a residential-led mixed-use development, including the delivery of 40 homes and Commercial B1 property.

Importantly, the policy also specifies that the development proposal will need to comply with a number of provisions, including the protection of Green Infrastructure assets, appropriate buffer and boundary treatments, incorporating / enhancing existing PRoWs and sustainable travel (e.g. walking / cycling links). These measures have the potential to mitigate some of the impact pathways identified below.

Potential impact pathways are present:
• Atmospheric pollution
• Recreational pressure
• Loss of functionally linked land
• Water quality
• Water quantity, level and flow

Due to these potential linking impact pathways Policy HA9 is screened in for Appropriate Assessment.
</td>
</tr>
</table>

Policy	Text	Assessment
	Sustainable Travel and Highways h) Provision of off-site highway infrastructure improvements as necessary, having regard to requirements arising from the Transport Assessment and including: • An agreement for the proposed A48 Junction, footways, street lighting, crossing provision and associated highway improvements. An agreement for the construction of safe off-site pedestrian and cycling crossing of the A48, and to allow for connection to the NCN 4.	

<table>
<tr><th>Policy</th><th>Text</th><th>Assessment</th></tr>
<tr>
<td>Policy HA10 – Land South of Monmouth Road, Raglan</td>
<td>
Allocated for residential development

Development of the site should accord with the following parameters, Placemaking Principles and Development Requirements, which should be delivered in an appropriately phased manner and be formally tied to planning consents.

<table>
<tr><th>Site Area</th><th>Allocation Type</th><th>Total Homes</th></tr>
<tr><td>4.5 ha</td><td>Residential</td><td>Approx No. Homes: 54
Open Market Homes: 27
Affordable Homes: 27</td></tr>
</table>

In addition to the Placemaking Principles identified in Policy S8, the site must comply with the following:

Sustainable Communities

a) Development should not have a significant adverse impact on the settings of Raglan Castle Schedule Ancient Monument and Registered Park and Garden.
b) The site's location bordering Raglan Conservation Area and positioning alongside the main access into the Conservation Area should be reflected in the site's masterplanning.
c) Building form and type should be varied with a mix of positions to help create space between the buildings and emphasise the linkages to the wider landscape.
d) Building heights should be one or two storeys to ensure effective integration into the landscape.

Green Infrastructure, Landscape and Nature Recovery

e) Protect, buffer and maintain existing TPO trees and other trees and hedgerows by including within the Green Infrastructure provision and enhance by include new planting of native species of local provenance.
f) Include opportunities for grassland improvement and habitat suitable for breeding great crested newts.

Sustainable Travel and Highways

g) Provision of off-site highway infrastructure improvements as necessary, having regard to requirements arising from the Transport Assessment and including:
</td>
<td>
Likely Significant Effects on European sites cannot be excluded.

This policy allocates a 4.5ha site on Land South of Monmouth Road, for residential development, including the delivery of 54 homes.

Importantly, the policy also specifies that the development proposal will need to comply with a number of provisions, including the protection of Green Infrastructure assets, opportunities for grassland improvement and habitat for breeding great crested newts, incorporating / enhancing existing PRoWs and contributing to sustainable travel. These measures have the potential to mitigate some of the impact pathways identified below.

Potential impact pathways are present:
• Atmospheric pollution
• Recreational pressure
• Loss of functionally linked land
• Water quality
• Water quantity, level and flow

Due to these potential linking impact pathways Policy HA10 is screened in for Appropriate Assessment.
</td>
</tr>
</table>

Policy	Text	Assessment
	• An agreement with the Council for the proposed Monmouth Road junction, footways, street lighting, crossing provision and the widening and improvement of the existing footway on Monmouth Road. • Primary access arrangements on to Monmouth Road. • An emergency secondary access on to Station Road. • Financial contributions to carry out necessary improvements to the local and strategic highway network. • Financial contributions to improve public transport services and nearby infrastructure. • Provision of good quality, safe, legible and accessible pedestrian and cycle linkages to key access points including a footpath link onto Station Road linking to the primary school and playing fields to the south and the village centre via Chepstow Road.	

<table>
<tr><th>Policy</th><th>Text</th><th>Assessment</th></tr>
<tr>
<td>Policy HA11 – Land-east of Burrium Gate, Usk</td>
<td>
Allocated for residential development

Development of the site should accord with the following parameters, placemaking principles and development requirements, which should be delivered in an appropriately phased manner and be formally tied to planning consents.

<table>
<tr><th>Site Area</th><th>Allocation Type</th><th>Total Homes</th></tr>
<tr><td>2.6 ha</td><td>Residential</td><td>Approx No. of Homes: 40
Open Market Homes: 20
Affordable Homes: 20</td></tr>
</table>

In addition to the placemaking principles identified in Policy S8, the site must comply with the following:

Green Infrastructure, Landscape and Nature Recovery

a) The development layout will respond to its topography and be maintained within a 35m contour above Ordnance Datum (AOD) with a development ridgeline no more than 40m AOD, in order to protect the landscape character of Usk.
b) The boundary hedge to the east and south of the site will be retained and enhanced, allowing for site access where appropriate.
c) An appropriate buffer to SINC sites will be included and opportunities to create and enhance priority grassland habitat will be provided as part of the development.

Sustainable Travel and Highways

d) Provision of off-site highway infrastructure improvements as necessary, having regard to requirements arising from the Transport Assessment and including:
• An agreement for the proposed Monmouth Road junction, footways, street lighting, crossing provision and the widening and improvement of the existing footway on Monmouth Road.
• Provision of good quality, safe, legible and accessible pedestrian and cycle linkages.
• Financial contributions to improve public transport services and nearby infrastructure.
• Implementation of a traffic regulation order to extend the speed limit on Monmouth Road.

Residential amenity
</td>
<td>
Likely Significant Effects on European sites cannot be excluded.

This policy allocates a 2.6ha site on Land East of Burrium Gate, for residential development, including the delivery of 40 homes.

Importantly, the policy also specifies that the development proposal will need to comply with a number of provisions, including the provision of and appropriate buffer for SINC sites, opportunities for grassland creation and enhancement, provision of pedestrian and cycle linkages and contributions towards public transport. These measures have the potential to mitigate some of the impact pathways identified below.

Potential impact pathways are present:
• Atmospheric pollution
• Recreational pressure
• Loss of functionally linked land
• Water quality
• Water quantity, level and flow

Due to these potential linking impact pathways Policy HA11 is screened in for Appropriate Assessment.
</td>
</tr>
</table>

<table>
<tr><th>Policy</th><th>Text</th><th>Assessment</th></tr>
<tr><td></td><td>e) The incorporation of satisfactory air quality measures for mitigating and/or reducing emissions within Usk's AQMA. Development must not significantly worsen (either individually or cumulatively) any air pollution emissions in areas where pollution levels are close to their objective or limit value levels, nor result in a breach of an air quality objective or limit value.

Flood Risk and Sustainable Drainage Systems

f) A scheme for the management of overland flows from adjacent land will need to be included to ensure existing overland flood risk has been accommodated within the layout of the site.</td><td></td></tr>
<tr><td>Policy HA12 – Land west of Trem yr Ysgol, Penperlleni</td><td>Allocated for a residential development

Development of the site should accord with the following parameters, placemaking principles and development requirements, which should be delivered in an appropriately phased manner and be formally tied to planning consents.

<table>
<tr><th>Site Area</th><th>Allocation Type</th><th>Total Homes</th></tr>
<tr><td>3.4 ha</td><td>Residential</td><td>Approx No. of Homes: 42
Open Market Homes: 21
Affordable Homes: 21</td></tr>
</table>

In addition to the placemaking principles identified in Policy S8, the site must comply with the following:

Green Infrastructure, Landscape and Nature Recovery

a) The site design will identify and respect any key views to the wider Bannau Brycheiniog National Park (BBNP).

b) Protect, buffer, enhance and maintain existing TPO trees and other veteran and over-mature trees and hedgerows and include within the Green Infrastructure provision new planting of native species of local provenance.

c) An appropriate landscape buffer will be provided to the eastern stream corridor.

Sustainable Travel and Highways

d) Provision of off-site highway infrastructure improvements as necessary, having regard to requirements arising from the Transport Assessment and including:
• An agreement to extend and re-engineer Trem yr Ysgol to provide pedestrian and primary vehicular access;</td><td>Likely Significant Effects on European sites cannot be excluded.

This policy allocates a 3.4ha site on Land west of Trem yr Ysgol, for residential development, including the delivery of 42 homes.

Importantly, the policy also specifies that the development proposal will need to comply with a number of provisions, including the protection and provision of existing mature trees and hedgerows, and provision of pedestrian access to the southbound bus stop. These measures have the potential to mitigate some of the impact pathways identified below.

Potential impact pathways are present:
• Atmospheric pollution
• Recreational pressure
• Loss of functionally linked land
• Water quality
• Water quantity, level and flow

Due to these potential linking impact pathways Policy HA12 is screened in for Appropriate Assessment.</td></tr>
</table>

<table>
<tr><th>Policy</th><th>Text</th><th>Assessment</th></tr>
<tr><td></td><td>• Provision of a link through the site to allow for pedestrian access to the southbound bus stop.</td><td></td></tr>
<tr><td>Policy HA13 – Land adjacent to Piercefield Public House, St Arvans</td><td>Allocated for residential development

Development of the site should accord with the following parameters, placemaking principles and development requirements, which should be delivered in an appropriately phased manner and be formally tied to planning consents.

<table><tr><th>Site Area</th><th>Allocation Type</th><th>Total Homes</th></tr><tr><td>1.1 ha</td><td>Residential</td><td>Approx No. of Homes: 16
Open Market Homes: 8
Affordable Homes: 8</td></tr></table>
In addition to the placemaking principles identified in Policy S8, the site must comply with the following:

Green Infrastructure, Landscape and Nature Recovery

a) The site design will identify and respect any key views to the wider Wye Valley National Landscape (AONB) setting.

b) The site is within the 7km Core Recreational Catchment Zone for the Severn Estuary European Marine Site and will be considered for a financial contribution as part of the Mitigation Strategy for the site. Green space design must consider any emerging guidance for Suitable Alternate Natural Greenspace (SANG) to reduce recreational pressure on the features of the estuary.

c) Provision of a lighting strategy that considers and mitigates for visual impact on landscape character and setting and minimises light spillage on to wildlife corridors and habitats, including corridors used by bats.

Sustainable Travel and Highways

d) Provision of off-site highway infrastructure improvements as necessary, having regard to requirements arising from the Transport Assessment and including:
• An agreement for proposed A466 road junction, footways, street lighting, crossing provision, connection to the cycle network and the widening and improvement of the existing footway on the A466.
• The layout will connect the proposal to the existing Public Right of Way 379/1/2 footpath running along the site’s south eastern boundary.</td><td>Likely Significant Effects on European sites cannot be excluded.

This policy allocates a 1.1ha site on Land adjacent to Piercefield Public House, for residential development, including the delivery of 16 homes.

Importantly, the policy also specifies that the development proposal will need to comply with a number of provisions, including possible financial contributions to mitigate impacts on the Severn Estuary European Marine Site, and following emerging guidance for Suitable Alternative Natural Greenspace (SANG). These measures have the potential to mitigate some of the impact pathways identified below.

Potential impact pathways are present:
• Atmospheric pollution
• Recreational pressure
• Loss of functionally linked land
• Water quality
• Water quantity, level and flow

Due to these potential linking impact pathways Policy HA13 is screened in for Appropriate Assessment.</td></tr>
</table>

<table>
<tr><th>Policy</th><th>Text</th><th>Assessment</th></tr>
<tr>
<td>Policy HA14 – Land at Churchfields, Devauden</td>
<td>
Allocated for residential development

Development of the site should accord with the following parameters, placemaking principles and development requirements, which should be delivered in an appropriately phased manner and be formally tied to planning consents.

<table>
<tr><th>Site Area</th><th>Allocation Type</th><th>Total Homes</th></tr>
<tr><td>1 ha</td><td>Residential</td><td>Approx No. of Homes: 20
Open Market Homes: 10
Affordable Homes: 10</td></tr>
</table>

In addition to the placemaking principles identified in Policy S8, the site must comply with the following:

Green Infrastructure, Landscape and Nature Recovery

a) The site design will identify and respect any key views to the wider Wye Valley National Landscape (AONB) setting.

b) Development of the site to consider existing topography, assets, features and contours of the site and include measures to integrate development appropriately while reducing visual impact.

Sustainable Travel and Highways

c) Provision of off-site highway infrastructure improvements as necessary, having regard to requirements arising from the Transport Assessment and including:
• An agreement to extend and re-engineer Churchfields to provide pedestrian improvements (to nearby bus stops) and primary vehicular access;

d) The layout will connect the proposal to the existing Public Right of Way 357/64/1 footpath running along the site’s western boundary.
</td>
<td>
Likely Significant Effects on European sites cannot be excluded.

This policy allocates a 1ha site on Land at Churchfields, for residential development, including the delivery of 20 homes.

Importantly, the policy also specifies that the development proposal will need to comply with a number of provisions, including connection to existing PRoW and provision of pedestrian improvements to nearby bus stops. These measures have the potential to mitigate some of the impact pathways identified below.

Potential impact pathways are present:
• Atmospheric pollution
• Recreational pressure
• Loss of functionally linked land
• Water quality
• Water quantity, level and flow

Due to these potential linking impact pathways Policy HA14 is screened in for Appropriate Assessment.
</td>
</tr>
</table>

<table>
<tr><th>Policy</th><th>Text</th><th>Assessment</th></tr>
<tr>
<td>Policy HA15 – Land east of Little Mill</td>
<td>
Allocated for residential development

Development of the site should accord with the following parameters, placemaking principles and development requirements, which should be delivered in an appropriately phased manner and be formally tied to planning consents.

<table>
<tr><th>Site Area</th><th>Allocation Type</th><th>Total Homes</th></tr>
<tr><td>1.68ha</td><td>Residential</td><td>Approx No. of Homes: 20
Open Market Homes: 10
Affordable Homes: 10</td></tr>
</table>

In addition to the Placemaking Principles identified in Policy S8, the site must comply with the following:

Green Infrastructure, Landscape and Nature Recovery

a) Sensitive lighting of the site and associated infrastructure will be required due to the presence of a high conservation value lesser horseshoe bat roost to the south of the site.

b) An area of public open space must be included within the site boundary in the south eastern corner of the site.

Sustainable Travel and Highways

c) Provision of off-site highway infrastructure improvements as necessary, having regard to requirements arising from the Transport Assessment and including:
• Provision of vehicular access via Cae Melin
• Provision of a 2.0 metre wide footway on eastern side of Cae Melin linking to existing footways on the A472.

Flood Risk and Sustainable Drainage Systems

d) A scheme for the management of overland flows from adjacent land will need to be included to ensure the potential flood risk from the land above the site has been accommodated within the layout of the site.
</td>
<td>
Likely Significant Effects on European sites cannot be excluded.

This policy allocates a 1.68ha site on Land east of Little Mill, for residential development, including the delivery of 20 homes.

Importantly, the policy also specifies that the development proposal will need to comply with a number of provisions, including the provision of on site open space in the south east of the site, provision of a footway to connect to existing footways. These measures have the potential to mitigate some of the impact pathways identified below.

Potential impact pathways are present:
• Atmospheric pollution
• Recreational pressure
• Loss of functionally linked land
• Water quality
• Water quantity, level and flow

Due to these potential linking impact pathways Policy HA15 is screened in for Appropriate Assessment.
</td>
</tr>
</table>

<table>
<tr><th>Policy</th><th>Text</th><th>Assessment</th></tr>
<tr>
<td>Policy HA16 – Land North of Little Mill</td>
<td>
Allocated for residential development

Development of the site should accord with the following parameters, placemaking principles and development requirements, which should be delivered in an appropriately phased manner and be formally tied to planning consents.

<table>
<tr><th>Site Area</th><th>Allocation Type</th><th>Total Homes</th></tr>
<tr><td>0.87ha</td><td>Residential</td><td>Approx No. of Homes: 15
Open Market Homes: 7
Affordable Homes: 8</td></tr>
</table>

In addition to the Placemaking Principles identified in Policy S8, the site must comply with the following:

Green Infrastructure, Landscape and Nature Recovery
a) Protect buffer and maintain existing mature trees within the Green Infrastructure provision of the site.
b) Provision of a lighting strategy that considers and mitigates for visual impact on landscape character and setting and minimises light spillage on to wildlife corridors and habitats, including corridors used by bats.

Sustainable Travel and Highways
c) Off-site highway infrastructure improvements as necessary including vehicular access through the extension of Ty Gwyn Road.
d) Provision of good quality, safe, legible and accessible pedestrian and cycle linkages to key access points including public transport stops, the public rights of way network and key services including those located along Berthon Road.

Residential Amenity
e) The incorporation of appropriate noise and vibration mitigation measures reflecting the site's proximity to the railway line on its north-western boundary.

Flood Risk and Sustainable Drainage Systems
</td>
<td>
Likely Significant Effects on European sites cannot be excluded.

This policy allocates a 0.87ha site on Land North of Little Mill, for residential development, including the delivery of 15 homes.

Importantly, the policy also specifies that the development proposal will need to comply with a number of provisions, including protecting, buffering and maintaining existing mature trees, provision of pedestrian and cycle linkages. These measures have the potential to mitigate some of the impact pathways identified below.

Potential impact pathways are present:
• Atmospheric pollution
• Recreational pressure
• Loss of functionally linked land
• Water quality
• Water quantity, level and flow

Due to these potential linking impact pathways Policy HA16 is screened in for Appropriate Assessment.
</td>
</tr>
</table>

<table>
<tr><th>Policy</th><th>Text</th><th>Assessment</th></tr>
<tr><td></td><td>f) Incorporation of surface water drainage solutions to the south eastern corner of the site.</td><td></td></tr>
<tr><td>Policy HA17 – Land adjacent to Llanellen Court Farm, Llanellen</td><td>Allocated for residential development

Development of the site should accord with the following parameters, placemaking principles and development requirements, which should be delivered in an appropriately phased manner and be formally tied to planning consents.

<table>
<tr><th>Site Area</th><th>Allocation Type</th><th>Total Homes</th></tr>
<tr><td>1.56ha</td><td>Residential</td><td>Approx No. of Homes: 26
Open Market Homes: 13
Affordable Homes: 13</td></tr>
</table>

In addition to the Placemaking Principles identified in Policy S8, the site must comply with the following:

Green Infrastructure, Landscape and Nature Recovery

a) Protect, buffer and maintain existing TPO trees and other trees and hedgerows by including within the Green Infrastructure provision and enhance by include new planting of native species of local provenance.

Sustainable Travel and Highways

b) An agreement must be entered into with the Council for the implementation of required off-site works and improvement measures including:
• The adoption of the existing development access.
• The construction of the proposed off-site pedestrian/cycling improvements for safe access to bus stops on the A4042 in both directions.
• The creation of accessible pedestrian access to the bus stop on Elm Drive, a shared-use path to link to the Monmouthshire and Brecon Canal and exploration of better links to the village centre other than the PROW.
• The provision of access improvements where necessary.</td><td>Likely Significant Effects on European sites cannot be excluded.

This policy allocates a 1.56ha site on Land adjacent to Llanellen Court Farm, for residential development, including the delivery of 26 homes.

Importantly, the policy also specifies that the development proposal will need to comply with a number of provisions, including protecting, buffering and maintaining existing trees and hedgerows, provision of pedestrian access to existing bus stops. These measures have the potential to mitigate some of the impact pathways identified below.

Potential impact pathways are present:
• Atmospheric pollution
• Recreational pressure
• Loss of functionally linked land
• Water quality
• Water quantity, level and flow

Due to these potential linking impact pathways Policy HA17 is screened in for Appropriate Assessment.</td></tr>
</table>

<table>
<tr><th>Policy</th><th>Text</th><th>Assessment</th></tr>
<tr>
<td>Policy HA18 – Land West of Redd Landes, Shirenewton</td>
<td>
Allocated for residential development

Development of the site should accord with the following parameters, placemaking principles and development requirements, which should be delivered in an appropriately phased manner and be formally tied to planning consents.

<table>
<tr><th>Site Area</th><th>Allocation Type</th><th>Total Homes</th></tr>
<tr><td>1.76ha</td><td>Residential</td><td>Approx No. of Homes: 26
Open Market Homes: 13
Affordable Homes: 13</td></tr>
</table>

In addition to the Placemaking Principles identified in Policy S8, the site must comply with the following:

Sustainable Communities

c) Inclusion of an active frontage along the main road to foster connection with the wider settlement.

Green Infrastructure, Landscape and Nature Recovery

d) Existing boundary features to be enhanced with additional hedgerow and tree planting to boundaries to mitigate for development and respond to its edge of settlement location.

e) The site is within the 7km Core Recreational Catchment Zone for the Severn Estuary European Marine Site and will be considered for a financial contribution as part of the Mitigation Strategy for the site. Green space design must consider any emerging guidance for Suitable Alternate Natural Greenspace (SANG) to reduce recreational pressure on the features of the estuary.

f) Provision of a lighting strategy that considers and mitigates for visual impact on landscape character and setting and minimises light spillage on to wildlife corridors and habitats.

Sustainable Travel and Highways

g) Provision of on and off-site measures to provide good quality, attractive, safe, legible and accessible pedestrian and cycle linkages both to and within the new development area. Key connections include a footpath link on the eastern part of the site to the road frontage footway allowing for ease of access to the recreation hall and grounds, along with a new footway link to the north of the site connecting to the existing Public Right of Way 380/42/1.
</td>
<td>
Likely Significant Effects on European sites cannot be excluded.

This policy allocates a 1.76ha site on Land West of Redd Landes, Shirenewton, for residential development, including the delivery of 26 homes.

Importantly, the policy also specifies that the development proposal will need to comply with a number of provisions, including enhancing boundary features wit hedgerow and tree planting, potential financial contributions to Severn Estuary European Marine Site, provision of pedestrian and cycle linkages. These measures have the potential to mitigate some of the impact pathways identified below.

Potential impact pathways are present:
• Atmospheric pollution
• Recreational pressure
• Loss of functionally linked land
• Water quality
• Water quantity, level and flow

Due to these potential linking impact pathways Policy HA18 is screened in for Appropriate Assessment.
</td>
</tr>
</table>

Policy	Text	Assessment
	h) Provision of off-site highway infrastructure improvements as necessary, having regard to requirements arising from the Transport Assessment and including: • An agreement must be entered into with the Council for facilitation of the construction of the development access; • A 2 metre footway on the northern side of Route R122 Earlswood Road over the site's frontage linking to the existing footway at Redd Landes; • Relocation of the existing 20mph and 40mph speed limits and measures to promote the change in speed limit and environment, the location of which to be agreed with the Council. Other i) Protection measures in the form of a diversion or easement width may be required to ensure the protection of any water mains traversing the site.	
Gypsy and Travellers		
Strategic Policy S9 – Gypsy and Travellers	Land will be made available at Bradbury Farm, Crick for 7 pitches to accommodate unmet Gypsy and Traveller accommodation needs identified in the latest Gypsy and Traveller Accommodation Assessment.	Likely Significant Effects on European sites cannot be excluded. Potential impact pathways are present: • Atmospheric pollution • Recreational pressure • Water quality • Water quantity, level and flow Due to these potential linking impact pathways Policy S9 is screened in for Appropriate Assessment.

Policy	Text	Assessment
Policy GT1 – Gypsy, Traveller and Showpeople Sites	Proposals for Gypsy and Traveller and Travelling Showpeople Site will be permitted provided that: a) the site is within or adjacent to a settlement boundary. Sites in the countryside away from existing settlements will be considered where there is a lack of suitable sustainable locations for sites within or adjacent to existing settlement boundaries, in accordance with Circular 005/2018; b) the site has a safe and convenient access to the highway network and will not cause traffic congestion or safety problems; c) the site is of a suitable size to allow for the planned number of caravans, amenity blocks, a play area (for children on sites housing multiple families), the access road and include sufficient space for the parking and safe circulation of all vehicles associated with occupiers within the site curtilage; d) the site does not occupy a prominent location and is consistent with LP policies for protecting and enhancing character and distinctiveness of the landscape and environment. Where necessary the proposal will include mitigating measures to reduce the impact, and assimilate the proposal into its surroundings e.g. screening and landscaping; e) the site is not within areas at high risk of flooding and proximity to uses with potential sources of pollution or emissions; f) the site is of an appropriate scale to its location and does not have an unacceptable impact on the amenities of neighbouring land uses; g) it is served, or can be served, by adequate on-site services for water supply, power, drainage, sewage disposal and waste disposal (storage and collection), and for Travelling Showpeople	There are no LSEs of this policy on European sites. This is a development management policy that requires sites for gypsy, travellers and travelling showpeople to meet certain criteria including being of suitable size. Location and not pose unacceptable impacts on amenity of neighbouring land uses. The policy does not specify any quantum or location of housing and / or employment development. Overall, there are no impact pathways present and Policy GT1 is screened out from AA.
Employment and Economy		

Policy	Text	Assessment
Strategic Policy S10 – Employment Sites Provision	Provision is made for 57ha of employment land to meet a minimum requirement of 38ha of land on a suitable range and choice of sites for industrial and business development (Use Classes B1, B2, B8) in accordance with the Plan's Spatial Strategy. Existing employment land and premises that continue to be required for employment purposes will be protected from alternative forms of development. Development proposals within settlement boundaries that seek to deliver the Council's vision for sustainable economic growth will be permitted, particularly where they reflect the aims of the Economy, Employment & Skills Strategy. All proposals will be subject to detailed planning considerations, including the protection of the natural and built environment.	Likely Significant Effects on European sites cannot be excluded. This is an employment management policy that provides for 57ha of employment land to be delivered in the Plan period. There are potential linking impact pathways associated with the delivery of industrial and business development. **Potential impact pathways are present:** • **Atmospheric pollution** • **Loss of functionally linked land** • **Water quality** • **Water quantity, level and flow** Due to these potential linking impact pathways Strategic Policy 10 is screened in for Appropriate Assessment.

<table>
<tr><th>Policy</th><th>Text</th><th>Assessment</th></tr>
<tr><td>Policy EA1 – Employment Allocations</td><td>The following sites are identified for new industrial and business development (Use classes B1, B2 and B8):
<table>
<tr><th>Site Ref</th><th>Site Name</th><th>Area (Ha)</th><th>Use Class</th></tr>
<tr><td colspan="4">Industrial and Business Sites</td></tr>
<tr><td>EA1a</td><td>Land at Nantgavenny Business Park, Abergavenny</td><td>0.59</td><td>B1</td></tr>
<tr><td>EA1b</td><td>Poultry Units, Rockfield Road, Monmouth</td><td>1.3</td><td>B1</td></tr>
<tr><td>EA1c</td><td>Land North of Wonastow Road, Monmouth</td><td>4.5</td><td>B1, B2, B8</td></tr>
<tr><td>EA1d</td><td>Newhouse Farm, Chepstow</td><td>2.5</td><td>B1, B2, B8</td></tr>
<tr><td>EA1e</td><td>Land adjoining Oak Grove Farm, Caldicot</td><td>6</td><td>B1, B2, B8</td></tr>
<tr><td>EA1f</td><td>Quay Point, Magor</td><td>14</td><td>B1, B2, B8</td></tr>
<tr><td>EA1g</td><td>Rockfield Farm, Undy</td><td>3.2</td><td>B1</td></tr>
<tr><td>EA1h</td><td>Gwent Euro Park, Magor</td><td>7</td><td>B1, B2, B8</td></tr>
<tr><td>EA1i</td><td>Raglan Enterprise Park, Raglan</td><td>1.5</td><td>B1, B2, B8</td></tr>
<tr><td>EA1j</td><td>Land West of Raglan</td><td>4.5</td><td>B1, B2, B8</td></tr>
<tr><td colspan="4">Identified Mixed Use Sites</td></tr>
<tr><td>EA1k</td><td>Land to the East of Abergavenny</td><td>1</td><td>B1</td></tr>
<tr><td>EA1l</td><td>Land at Former MoD Site, Caerwent</td><td>1</td><td>B1</td></tr>
<tr><td>EA1m</td><td>Land to the East of Caldicot</td><td>1</td><td>B1</td></tr>
<tr><td colspan="2">Total</td><td>48.09</td><td></td></tr>
</table></td><td>Likely Significant Effects on European sites cannot be excluded.
This is an employment management policy that allocates 48.09ha of employment land to be delivered in the Plan period. There are potential linking impact pathways associated with the delivery of industrial and business development.
Potential impact pathways are present:
• Atmospheric pollution
• Loss of functionally linked land
• Water quality
• Water quantity, level and flow
Due to these potential linking impact pathways Policy EA1 is screened in for Appropriate Assessment.</td></tr>
</table>

<table>
<tr><th>Policy</th><th>Text</th><th>Assessment</th></tr>
<tr><td>Policy EA2 – Protected Employment Sites</td><td>The following existing sites as indicated on the Proposals Maps are protected for industrial and business development (Use Classes B1, B2 and B8):

<table><tr><th>Site Ref</th><th>Site Name</th></tr><tr><td>EA2a</td><td>Mill Street, Abergavenny</td></tr><tr><td>EA2b</td><td>Lower Monk Street, Abergavenny</td></tr><tr><td>EA2c</td><td>Union Road, Abergavenny</td></tr><tr><td>EA2d</td><td>Hatherleigh Place, Abergavenny</td></tr><tr><td>EA2e</td><td>Former Cranberry Foods, Abergavenny</td></tr><tr><td>EA2f</td><td>Nantgavenny Business Park, Abergavenny</td></tr><tr><td>EA2g</td><td>Station Road, Chepstow</td></tr><tr><td>EA2h</td><td>Job Centre, Chepstow</td></tr><tr><td>EA2i</td><td>Bulwark Road, Chepstow</td></tr><tr><td>EA2j</td><td>Beaufort Park, Chepstow</td></tr><tr><td>EA2k</td><td>Newhouse Farm, Chepstow</td></tr><tr><td>EA2l</td><td>Wonastow Road, Monmouth</td></tr><tr><td>EA2m</td><td>Mayhill/Hadnock Road, Monmouth</td></tr><tr><td>EA2n</td><td>Tri-Wall, Wonastow, Monmouth</td></tr><tr><td>EA2o</td><td>Magor Brewery, Magor</td></tr><tr><td>EA2p</td><td>Severn Bridge, Caldicot</td></tr><tr><td>EA2q</td><td>Cheeseman’s Industrial Estate, Rogiet</td></tr><tr><td>EA2r</td><td>Progress Industrial Estate, Rogiet</td></tr><tr><td>EA2s</td><td>Wales One, Magor</td></tr><tr><td>EA2t</td><td>Cuckoo’s Row, Raglan</td></tr><tr><td>EA2u</td><td>Raglan Enterprise Park, Raglan</td></tr><tr><td>EA2v</td><td>Grange Mill Industrial Estate, Raglan</td></tr><tr><td>EA2w</td><td>Little Castle Farm Business Park, Raglan</td></tr><tr><td>EA2x</td><td>Woodside Industrial Estate, Usk</td></tr></table></td><td>Likely Significant Effects on European sites cannot be excluded.
This is an employment management policy that protects existing sites for industrial and business uses. There are potential linking impact pathways associated with the delivery of industrial and business development.
Potential impact pathways are present:
• Atmospheric pollution
• Loss of functionally linked land
• Water quality
• Water quantity, level and flow
Due to these potential linking impact pathways Policy EA2 is screened in for Appropriate Assessment.</td></tr>
</table>

Policy	Text	Assessment
	EA2y Mamhilad	
Policy E1 – Protection of Existing Employment Land	Proposals that will result in the loss of existing or allocated industrial and business sites or premises (Use Classes B1, B2 and B8) to other uses will only be permitted if: a) The site or premises is no longer suitable or well-located for employment use; b) A sufficient quantity and variety of industrial sites or premises is available and can be brought forward to meet the employment needs of the County and the local area; c) There is no viable industrial or business employment use for the site or premises; d) There would be substantial amenity benefits in allowing alternative forms of development at the site or premises; e) The loss of the site would not be prejudicial to the aim of creating a balanced local economy. Exceptionally, planning permission may be granted for a change of use of existing employment land when the above criteria are not fully complied with if: i) The proposal is for small scale retail uses which are ancillary to the main business / industrial activity; or ii) Small scale service activities of an industrial nature which are not suited to the high street and involve the sale, service or repair of vehicles or machinery.	There are no LSEs of this policy on European sites. This is a development management policy that sets criteria for any loss of existing or allocated industrial and business sites. It also states that exceptions for small scale ancillary uses may be granted. The policy does not specify any quantum or location of housing and / or employment development. Overall, there are no impact pathways present and Policy E1 is screened out from AA.

Policy	Text	Assessment
Policy E2 – Non-allocated Employment Sites	Proposals for industrial and business development (Use Classes B1, B2 and B8) by non-speculative single-site users will be permitted provided that all the following conditions are met: a) The proposed site is within or adjoining settlement boundaries of Primary Settlements or existing and proposed industrial / business sites; b) It can be demonstrated that the proposal cannot be accommodated on existing or proposed industrial or business sites within the County; c) The proposal is compatible with adjacent land uses; d) There is a demonstrable need for the type and scale of development in that location; and e) The proposal would cause no unacceptable harm to the surrounding landscape, historic / cultural heritage, biodiversity or local amenity value. f) Such developments will be controlled with a Section 106.	There are no LSEs of this policy on European sites. This is a development management policy that sets criteria for proposals for non-allocated employment sites. This includes being located within or adjacent to existing settlement boundaries, being compatible with adjacent land uses and not causing unacceptable harm. The policy does not specify any quantum or location of housing and / or employment development. Overall, there are no impact pathways present and Policy E2 is screened out from AA.
Strategic Policy S11 – Rural Economy	Development to enable rural enterprise uses and the diversification of the rural economy will be permitted outside settlement boundaries where it is of a scale and type compatible with the surrounding area and will cause no unacceptable harm to the surrounding landscape, historic and cultural heritage, biodiversity or local amenity value. Development must re-use or adapt existing buildings where possible. The exceptional circumstances in which new buildings may be permitted outside settlement boundaries to support the rural economy are set out in RE1, RE3, RE4, RE5 and RE6.	There are no LSEs of this policy on European sites. This is a development management policy providing for the development of the rural economy, provided there is no unacceptable harm to the surrounding landscape and biodiversity value. While the policy might therefore accommodate employment development, this is covered in Strategic Policy S10, and as such is not reassessed here. Overall, there are no impact pathways present and this policy can be screened out from Appropriate Assessment.

Policy	Text	Assessment
Policy RE1 – Secondary and Main Rural Settlements Employment Exceptions	Within or adjoining the settlement boundaries of the Secondary and Main Rural Settlements identified in Policy S2, the construction of small-scale purpose built industrial and business development will be permitted, subject to detailed planning considerations, including: a) The proposal would cause no unacceptable harm to the natural or built environment; b) It can be demonstrated that the proposal cannot be accommodated on existing or proposed industrial or business sites with the County; c) The proposal is compatible with surrounding land uses and in scale with the existing settlement.	There are no LSEs of this policy on European sites. This is a development management policy that sets criteria for industrial and business developments in rural settlements. This includes not causing unacceptable harm to the natural environment and being compatible with surrounding land. The policy does not specify any quantum or location of housing and / or employment development. Overall, there are no impact pathways present and Policy RE1 is screened out from AA.
Policy RE2 – The Conversion and Rehabilitation of Buildings in the Open Countryside for Employment Use	Proposals for the conversion or rehabilitation of existing buildings in the open countryside, to employment use will be permitted provided that all the following criteria are met: a) The form, bulk, and general design of the proposal, including any extensions, respect the rural character and design of the building; b) In respect of farm diversification proposals, any necessary re-building work should respect or be in sympathy with the location and traditional characteristics of the building; in all other cases the buildings should be capable of conversion without major or complete reconstruction; c) The more isolated and prominent the building the more stringent will be the design requirements with regard to new door and window openings, extensions and means of access, service provision and curtilage, especially if located within the Wye Valley National Landscape (AONB); d) The conversion of modern farm and forestry buildings will only be permitted if the building has been used for its intended purpose for a significant period of time. Particularly close scrutiny will be given to proposals relating to buildings that are less than 5 years old, or which are known to have been used for their intended purpose for less than 5 years, and where there has been no change in farming or forestry activities on the unit since the building was erected permission may be refused;	There are no LSEs of this policy on European sites. This is a development management policy that sets criteria for the conversion of existing rural buildings to employment use. This includes not requiring extensive expansion. The policy does not specify any quantum or location of housing and / or employment development. Overall, there are no impact pathways present and Policy RE2 is screened out from AA.

Policy	Text	Assessment
	e) The proposal including curtilage and access, is in scale and sympathy with the surrounding landscape and does not require the provision of unsightly infrastructure and ancillary buildings; and f) The building is capable of accommodating the proposed use without substantial extension. The above criteria will also be applied to proposals to extend buildings that have already been converted.	
Policy RE3 – Agricultural Diversification	Development proposals which make a positive contribution to agriculture diversification will be permitted where the new use or building meets the following criteria: a) The proposed non-agricultural development is run in conjunction with, and is complementary to, the agricultural activities of the enterprise; b) The proposal is supported by an appropriate business case which demonstrates the link to existing business activity and the benefits of the scheme in terms of sustaining employment / the rural economy; c) In relation to new build, the applicant must demonstrate that there are no existing buildings suitable for conversion / re-use in preference to new build; d) Any rebuilding work should respect or be in sympathy with the local and traditional characteristics of the building; e) Proposals for new built development meet the criteria set out in Policy OC1.	There are no LSEs of this policy on European sites. This is a development management policy that sets criteria for agricultural diversification. This includes having an appropriate business case and operating alongside agricultural activities. The policy does not specify any quantum or location of housing and / or employment development. Overall, there are no impact pathways present and Policy RE3 is screened out from AA.

Policy	Text	Assessment
Policy RE4 – New Agricultural and Forestry Buildings	New agricultural and forestry buildings, as well as any means of access and yard spaces, that are subject to planning control, will be permitted where: a) The building, hard standing or access is necessary for agricultural or forestry purposes; b) The building is functionally suitable for the specific use; c) Adequate provision is made for the disposal of foul and surface water and any animal waste without risk to the environment.	There are no LSEs of this policy on European sites. This is a development management policy that sets criteria for new agricultural and forestry buildings. The policy does not specify any quantum or location of housing and / or employment development. Overall, there are no impact pathways present and Policy RE4 is screened out from AA.
Policy RE5 – Intensive Livestock / Free Range Poultry Units	Intensive livestock or free-range poultry production units will be permitted subject to the following criteria: a) New livestock units and associated slurry tanks and lagoons are sited so as not to cause unacceptable nuisance to any non-agricultural dwelling or building; b) New units are sited so as to minimise their visual impact by avoiding exposed locations and, where practicable, locating them within or adjoining existing groups of buildings; c) Units that have serious implications for the surrounding highway network will be resisted; d) The unit is designed, and uses appropriate technology, to minimise the nuisance of smell, noise, air pollution and neutralise impact on water quality.	There are no LSEs of this policy on European sites. This is a development management policy that sets criteria for new livestock and poultry production units. This includes being designed to minimise the impacts on smell and noise as well as neutralising impact on water quality. The policy does not specify any quantum or location of housing and / or employment development. Overall, there are no impact pathways present and Policy RE5 is screened out from AA.

Policy	Text	Assessment
Policy RE6 – Provision of Recreation and Leisure Facilities in the Open Countryside	Development proposals for recreation and leisure uses in the countryside will be permitted subject to detailed planning considerations provided that: a) They are of a small-scale, informal nature and, including adequate safeguards for the character and appearance of the countryside (particularly its landscape, biodiversity and local amenity value). b) Development must re-use or adapt existing buildings where possible. In exceptional circumstances new buildings of an appropriate scale may be acceptable where justified and where the proposal meets the criteria set out in Policy OC1.	There are no LSEs of this policy on European sites. This is a development management policy that sets criteria for recreation and leisure facilities in the countryside. The policy does not specify any quantum or location of housing and / or employment development. Overall, there are no impact pathways present and Policy RE6 is screened out from AA.
Visitor Economy		
Strategic Policy 12 – Visitor Economy	Development proposals that support Monmouthshire's visitor economy and promote sustainable forms of tourism will be permitted subject to material planning considerations. Development proposals that would have an unacceptable adverse impact on features and areas of tourism interest and their landscape character and settings, or that would result in the unjustified loss of tourism facilities will not be permitted.	There are no LSEs of this policy on European sites. This is a development management policy that broadly supports tourism development within the LP area. It specifically encourages sustainable tourism. While this policy does support increases tourism development it does not allocate and quanta or sites for growth Overall, there are no impact pathways present and Policy S12 is screened out from AA.

Policy	Text	Assessment
Policy T1 – New or Extended Tourism Accommodation and Facilities in the Open Countryside	Development proposals for sustainable tourism accommodation and facilities in the open countryside will only be permitted if the proposal can be justified against any of the following criteria: a) Is of a small scale appropriate to its context and a non-permanent nature that would cause no material harm to the landscape character and environmental/biodiversity quality of the surrounding area, either individually or cumulatively with other development in the area; or b) Contributes to agricultural diversification or an existing rural enterprise business and meets the criteria set out in S11 and RE3; or c) Consists of the conversion/rehabilitation of an existing rural building meeting criteria set out within Policy H4; or d) Relies upon a geographically fixed resource which exceptionally justifies the development; or e) Is located within or adjacent to an existing visitor attraction or accommodation as ancillary development to established medium or large hotels.; or f) Demonstrates significant economic benefit to Monmouthshire. Sustainable tourism proposals in the open countryside that accord with any of the criteria above must also meet all of the following criteria set out in (g)-(l) below: g) Protect, maintain and enhance landscape character, biodiversity, the resilience of ecosystems and the historic environment; h) Are of a scale, permanency and design appropriate to site context; i) Incorporate sustainable and efficient resource use; j) Have the necessary infrastructure capacity; k) Prioritise, promote and facilitate sustainable travel and have safe and efficient highway design; l) Do not have an unacceptable amenity impact on occupiers of neighbouring properties. All tourism proposals must be evidenced with a ‘Sustainable Tourism Need and Impact Assessment’ (STNIA). All tourism proposals are required to be short-stay only and not extend beyond a period of stay of 28 days.	There are no LSEs of this policy on European sites. This is a development management policy that sets criteria for the development of sustainable tourism facilities in the open countryside. These include protecting, maintaining and enhancing the biodiversity and resilience of ecosystems, and promoting sustainable travel. The policy does not specify any quantum or location of housing and / or employment development. Overall, there are no impact pathways present and Policy T1 is screened out from AA.

Policy	Text	Assessment
Policy T2 – Protection of Existing Tourism Facilities	The loss of a tourism facility will only be permitted if: a) Its loss would not adversely affect the range and quality of tourism facilities available within the locality and/or County; and b) It can be demonstrated that the facility is no longer suitable or financially viable and could not be expected to become financially viable for tourism use.	There are no LSEs of this policy on European sites. This is a development management policy that sets criteria for the loss of a tourism facility. The policy does not specify any quantum or location of housing and / or employment development. Overall, there are no impact pathways present and Policy T2 is screened out from AA.
Sustainable Transport		
Strategic Policy S13 – Sustainable Transport	Development proposals will be required to accord with the Sustainable Transport Hierarchy, as set out in National Policy. This will be facilitated by: a) Promoting and prioritising active travel (walking, wheeling and cycling) and public transport above private motor vehicles, using location and design to reduce the need to travel; b) Maintaining and improving on the Active Travel Network Maps (ATNMs) to maximise active travel opportunities, including links to these networks associated with new developments; c) Ensuring development enables transition to Ultra Low Emission Vehicles (ULEVs) by providing necessary underlying infrastructure; d) Ensuring developments are designed to provide safe and efficient access and safe and efficient capacity to the transport network; e) Ensuring developments are served by an adequate level of parking provision, with cycle parking given competitive advantage, in accordance with relevant guidance; f) Demonstrating how proposals enable solutions to rural transport issues, where appropriate, and; g) Promoting digital and innovative infrastructure in both urban and rural areas to enable remote access to work, education and services.	There are no LSEs of this policy on European sites. This is a development management policy that sets a requirement for new development to accord with the Sustainable Transport Hierarchy that is national Policy. The policy does not specify any quantum or location of housing and / or employment development. Overall, there are no impact pathways present and Policy S13 is screened out from AA.

Policy	Text	Assessment
Policy ST1 – Sustainable Transport Proposals	All developments which are likely to have a significant impact on trip generation and travel demand must be accompanied by a Transport Assessment (TA). The TA must include a Transport Implementation Strategy that accords with the Sustainable Transport Hierarchy as set out in National Policy and develop a strategy to reduce the need to travel, facilitate, promote and prioritise active travel and ensure access to the public transport network. In town centre locations car-free development will be supported where practicable. If a rural location is essential for the proposed development, links to public transport should be considered and if necessary, included. A proportionate approach will be applied to the assessment of TAs and their accordance with the Sustainable Transport Hierarchy. Any new highway infrastructure and design will be expected to satisfy Active Travel Act Guidance (ATAG), National and Local highway design guides and parking guidelines. Financial contributions may be required for safety/congestion mitigation measures, or towards improvements to the highway network and sustainable travel. Developments that are likely to create significant additional road traffic growth, or adversely affect the safe and efficient operation of the highway system will not be permitted.	There are no LSEs of this policy on European sites. This is a development management policy that sets a requirement for the preparation of a Transport Assessment for developments that are likely to have significant impact on travel demand, as well as considering public transport, Active Travel Act Guidance, and required highway improvements. The policy does not specify any quantum or location of housing and / or employment development. Overall, there are no impact pathways present and Policy ST1 is screened out from AA.
Policy ST2 – Highway Hierarchy	The following transport routes are identified as the main routes in the County for the movement of people and goods. Development proposals should be assessed from the appropriate level highway in the hierarchy, which comprises the following routes: a) Strategic Routes: • Motorways M4 and M48; • Trunk roads A40T, A48T, A4042T, A449T, A465T, and A466T Only in exceptional circumstances, will new direct accesses be permitted off Strategic Routes. Proposals that would result in short local journeys on these routes and add to unacceptable congestion will be refused. b) Arterial Routes: • A48 (High Beech Roundabout, Chepstow to Newport) • A466 (High Beech Roundabout, Chepstow to Herefordshire boundary north of Monmouth) • A472 (Little Mill to Usk Interchange)	There are no LSEs of this policy on European sites. This is a development management policy that sets a hierarchy for main transport routes in Monmouthshire. This hierarchy informs what parking, turning movements, and route connections will be deemed acceptable in the interests of road safety. The policy does not specify any quantum or location of housing and / or employment development. Overall, there are no impact pathways present and Policy ST2 is screened out from AA.

Policy	Text	Assessment
	• A4077 (Gilwern to Powys boundary) • A4136 (Monmouth to Gloucestershire boundary) • A4143 (Llanfoist to Brecon Road, Abergavenny) • B4245 (Parkwall to Magor) On arterial routes 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. c) Local Routes: • B4233 (Monmouth to Abergavenny) • B4235 (Usk to Chepstow) • B4246 (Llanfoist to Gilwern) • B4251 (Abergavenny to Skenfrith) • B4269 (Llanfoist to Llanellen) • B4293 (Chepstow to Monmouth) • B4347 (Rockfield to Grosmont) • B4598 (Abergavenny to Usk). On local routes parking and turning movements may be restricted and the number of frontage accesses limited on road safety and traffic movement (especially public transport) grounds. d) Access Routes These roads are those not listed in (a), (b) or (c) above. If appropriate, parking, turning movements, traffic speeds and the number of frontage access will be limited on road safety, amenity and traffic movement grounds.	

Policy	Text	Assessment
Policy ST3 – Freight	To reduce or prevent heavy road freight traffic, opportunities to develop freight transfer points between road / rail / last mile sustainable transport should be explored and will be favourably considered subject to detailed planning considerations. The development of facilities for the movement of freight by rail will be favourably considered, subject to detailed planning considerations. Proposals which would prejudice the operation of, or cause the loss of, freight sites and facilities will not be permitted, unless the facility has closed or is closing and it can be shown that there is no realistic prospect of it resuming, having regard to its potential viability in the long term.	There are no LSEs of this policy on European sites. This is a development management policy that favourably considers development of freight transfer points between road/rail/last mile sustainable transport. This support for rail freight and sustainable last mile freight could have positive effects in terms of air pollution. The policy does not specify any quantum or location of housing and / or employment development. Overall, there are no impact pathways present and Policy ST3 is screened out from AA.
Policy ST4 – Rear Access/Service Areas within Central Shopping and Commercial Areas	Development within the defined Central Shopping and Commercial Areas that require servicing must, where feasible, include provision for rear access and servicing. Development that relies on the use of on-street servicing will only be permitted where this would not conflict with walking, cycling and general traffic flows, or create highway dangers. Development that would result in the loss of rear service roads or yards will only be permitted if satisfactory alternative provision is made.	There are no LSEs of this policy on European sites. This is a design management policy that supports rear servicing of developments in Central Shopping and Commercial Areas. The policy does not specify any quantum or location of housing and / or employment development. Overall, there are no impact pathways present and Policy ST4 is screened out from AA.

Policy	Text	Assessment
Policy ST5 – Transport Schemes	The following transport schemes identified in the Local Transport Strategy will be supported and safeguarded from development that would likely prejudice their implementation: **Active Travel schemes** a) Abergavenny and Llanfoist Active Travel Schemes b) Caldicot Active Travel Schemes c) Chepstow Active Travel Schemes d) Monmouth Active Travel Schemes e) Usk Active Travel Schemes f) Magor and Undy Active Travel Schemes g) Undy to Rogiet Active Travel improvements alongside B4245 **Public Transport Improvement schemes** h) Abergavenny Train Station improvements i) Abergavenny Bus Station improvements j) Chepstow Transport Hub (rail and bus) k) Severn Tunnel Junction Interchange improvements (rail and bus) l) Monmouth Bus/Coach Stop m) Magor Walkway Station **Road Schemes** n) B4245 /M48/ Severn Tunnel Junction Link Road o) B2425/Severn Tunnel Junction Link Road p) Chepstow Highbeech Roundabout improvements	There are no LSEs of this policy on European sites. This is a development management policy which indicates general support for several active transport improvements and schemes. This is a positive policy which will encourage greater use of active travel and public transport, thus reducing air pollution and its potential impact on European sites. The policy does not specify any quantum or location of housing and / or employment development. Overall, there are no impact pathways present and Policy ST5 is screened out from AA.

<table>
<tr><th>Policy</th><th>Text</th><th>Assessment</th></tr>
<tr><td>Policy ST6 – Protection of Redundant Routes</td><td>Redundant routes, such as former canal and rail routes and associated features, will be protected from development that would prejudice future sustainable transport use.</td><td>There are no LSEs of this policy on European sites.
This is a development management policy that protects redundant transport routes.
The policy does not specify any quantum or location of housing and / or employment development.
Overall, there are no impact pathways present and Policy ST6 is screened out from AA.</td></tr>
<tr><td>Retail and Commercial Centres</td><td></td><td></td></tr>
<tr><td>Strategic Policy S14 – Town, Local and Neighbourhood Centres</td><td>All new or enhanced retail, commercial and social developments, including leisure, cultural and entertainment uses, will be focused in accordance with the hierarchy defined below. Developments should be consistent in scale and nature with the size and character of the centre and its role in the hierarchy.
Proposals must maintain or enhance the vibrancy, vitality and attractiveness of the centre. Proposals which would undermine the vibrancy, vitality and attractiveness of the centre will not be permitted.
<table>
<tr><td>Town Centres:</td><td>Abergavenny, Caldicot, Chepstow, Monmouth</td></tr>
<tr><td>Minor County Town Centres:</td><td>Usk, Magor</td></tr>
<tr><td>Local Centres:</td><td>Raglan, Bulwark</td></tr>
<tr><td>Neighbourhood Centres:</td><td></td></tr>
<tr><td>Abergavenny:</td><td>Hillcrest Road, Rother Avenue and Hereford Road</td></tr>
<tr><td>Caldicot:</td><td>West End</td></tr>
</table></td><td>There are no LSEs of this policy on European sites.
This is a development management policy that sets out the retail hierarchy and protects the vitality, vitality and attractiveness of centres.
The policy does not specify any quantum or location of housing and / or employment development.
Overall, there are no impact pathways present and Policy S14 is screened out from AA.</td></tr>
</table>

Policy	Text	Assessment
	Chepstow: The Old Farm Shopping Centre, Thornwell and Larkfield Business Estate Monmouth: Overmonnow, Wyesham, The Albion and Monmouth District Centre	
Policy RC1 – Central Shopping and Commercial Areas	Central Shopping and Commercial Areas (CSCAs) are designated for Abergavenny, Caldicot, Chepstow, Monmouth, Magor and Usk. Within CSCAs (except for Primary Shopping Frontages) the following policy criteria apply, subject to detailed planning considerations: a) Development will be permitted where the proposal relates to a retail or commercial use which will safeguard the vitality, attractiveness and viability of the defined CSCAs; b) Change of use at ground floor level to uses other than retail or commercial will not be permitted unless it can be demonstrated that the vitality and viability of the CSCA will not be adversely affected; c) Change of use of ground floor premises to residential will not be permitted unless evidence is provided to demonstrate that the premises is not viable for retail or commercial use, including that the premises has been vacant for at least one year and that genuine attempts at marketing the existing use have been unsuccessful; The loss of car parking within CSCAs will be resisted, unless it can be demonstrated that the proposal is linked to a town centre regeneration scheme and sufficient parking is available.	There are no LSEs of this policy on European sites. This is a development management policy that supports rear servicing of developments in Central Shopping and Commercial Areas. The policy does not specify any quantum or location of housing and / or employment development. Overall, there are no impact pathways present and Policy RC1 is screened out from AA.

Policy	Text	Assessment
Policy RC2 – Primary Chopping Frontages	Primary Shopping Frontages are designated in Abergavenny, Caldicot, Chepstow and Monmouth in the following locations: Abergavenny PSF1 Cross Street, High Street & Frogmore Street PSF2 Cibi Walk PSF3 Cross Street (51-60 & Town Hall) Caldicot PSF4 Newport Road (17-41 & 26-32 & Holman House) Chepstow PSF5 High Street (2-23 & 24-29) PSF6 St Mary Street Monmouth PSF7 Monnow Street (1-93 & 6-114) PSF8 Church Street & Agincourt Square Within Primary Shopping Frontages, development or redevelopment proposals for non-A1 commercial uses on ground floors, or a change of use on ground floors from Use Class A1 to non-A1 commercial uses, will only be permitted where all of the following apply: a) It retains or delivers an active shopfront; b) The use would not create an over-concentration or unacceptable balance of non-A1 uses that would disproportionately dilute the continuity of the primary shopping frontage detracting from its established retail character; c) It would not result in the loss of A1 retail units in prominent locations, corner units or those with long frontages. Where a proposal fails to meet all of the above criteria, an exception may be considered provided: i) It can be demonstrated that the proposed use would not harm the vitality, attractiveness and viability of the street frontage; and ii) The premises have been vacant for at least a year, genuine attempts at marketing the existing use have been unsuccessful, and the proposal would bring a vacant premises back into an active commercial or community use.	There are no LSEs of this policy on European sites. This is a development management policy that designates certain areas as primary shopping frontages. This policy also limits development in these areas to ensure the provision of an active shop front and suitable commercial uses. The policy does not specify any quantum or location of housing and / or employment development. Overall, there are no impact pathways present and Policy RC2 is screened out from AA.

Policy	Text	Assessment
	A justification statement must be submitted to provide evidence for all proposals considered to be exceptions.	
Policy RC3 – Local Centres and Neighbourhood Centres/ Shops	The County's local centres, neighbourhood centres and shops are defined in Strategic Policy S14 and are identified on the Proposals Map. Development proposals for A1 retail development in designated local centres and neighbourhood centres will be permitted provided that the development, either individually or cumulatively with other recent or proposed developments, does not undermine the vitality, attractiveness or viability of town centres. Proposals for A1, A2, A3 and other complementary commercial uses will be supported in local and neighbourhood centres where they are in keeping with the scale, role and function of the individual centre. Proposals that would result in the loss of A1, A2, A3, or commercial uses within local centres and neighbourhood centres will not be permitted unless genuine attempts at marketing the existing use have been unsuccessful.	There are no LSEs of this policy on European sites. This is a development management policy that prevents development within local and neighbourhood centres if it would harm town centres. This policy also limits development in these areas to ensure the provision is appropriate to its location. The policy does not specify any quantum or location of housing and / or employment development. Overall, there are no impact pathways present and Policy RC3 is screened out from AA.
Policy RC4 – New Retail Proposals Outside of Identified Town and Local Centres	The preferred location for new retail and commercial uses, including extensions to existing retail and commercial premises, will be in the designated Central Shopping and Commercial Areas (CSCAs) and Local Centres. Where it can be demonstrated that no suitable sites exist in the CSCA/local centre, then sites on the edge of the CSCA/local centre should be considered before finally considering out-of-town sites. Development proposals outside these areas will be required to be assessed against the following criteria: a) A demonstrable need exists for the proposed development; b) The proposed development, either individually or cumulatively with other recent or proposed developments, would not have a detrimental impact on the trade/turnover, vitality and viability of town, local or neighbourhood centres; c) The proposed development is of an appropriate scale and type to the size, character and function of the centre and its position in the retail and commercial hierarchy; d) The proposed development would not have a detrimental impact on future public or private investment needed to safeguard vitality and viability of the centres; e) The proposal is in a location accessible by sustainable travel;	There are no LSEs of this policy on European sites. This is a development management policy that set criteria for the development of any retail and commercial development outside of designated centres. These criteria include that the site must be accessible by sustainable transport . The policy does not specify any quantum or location of housing and / or employment development. Overall, there are no impact pathways present and Policy RC4 is screened out from AA.

Policy	Text	Assessment
	f) The proposal is not on land allocated for other uses. This especially applies to land designated for industry, employment and housing, where retail and commercial development can be shown to limit the range and quality of sites for such uses. Retail Impact Assessments will be required for retail and commercial developments outside the centres identified in the retail and commercial hierarchy in Strategic Policy S10, the content of which should be proportionate to the potential impact of the proposed use. The following floorspace thresholds will apply: g) Outside the CSCAs of Abergavenny, Caldicot, Chepstow & Monmouth – 500 sq.m gross	
Community Infrastructure		
Strategic Policy S15 – Community and Recreation Facilities	Development proposals that provide and/or enhance community and recreation facilities will be permitted within or adjoining settlement boundaries subject to detailed planning considerations. Development proposals that result in the unjustified loss of community and recreation facilities will not be permitted.	There are no LSEs of this policy on European sites. This is a development management policy that protects existing community and recreation facilities and supports their provision in and adjoining settlements. The policy does not specify any quantum or location of housing and / or employment development. Overall, there are no impact pathways present and Strategic Policy S15 is screened out from AA.

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<table>
<tr><th>Policy</th><th>Text</th><th>Assessment</th></tr>
<tr><td>Policy CI1 – Retention of Existing Community Facilities</td><td>The change of use or conversion of neighbourhood or village shops, halls, public houses and other community facilities to other uses will only be permitted where all of the following criteria are met:
a) The local community would continue to be adequately served by facilities to which there is convenient access by sustainable travel;
b) Evidence is provided that the existing use is no longer viable. In respect to commercially operated facilities evidence must be provided that the facility is no longer financially viable;
c) Evidence is provided that appropriate marketing of the facility, whether in use or vacant, has been unsuccessful.</td><td>There are no LSEs of this policy on European sites.
This is a development management policy that set criteria for the change of use of community facilities.
The policy does not specify any quantum or location of housing and / or employment development.
Overall, there are no impact pathways present and Policy CI1 is screened out from AA.</td></tr>
<tr><td>Policy CI2 – Provision of Formal and Informal Open Space and Allotments/Community Growing Areas</td><td>New development proposals will be assessed against the Council's standards for recreation facilities, open space, allotments and community growing, as set out below:
<table>
<tr><th></th><th>Open Space Typology</th><th>Quantity Guideline (hectares per 1,000 population)</th><th>Definition</th></tr>
<tr><td rowspan="3">FORMAL OUTDOOR SPACE</td><td>Playing pitches</td><td>1.2 ha</td><td>Sports pitches including football rugby, hockey, lacrosse, cricket and American football</td></tr>
<tr><td>All outdoor sports</td><td>1.6 ha</td><td>Courts and greens comprising natural or artificial surfaces, including tennis courts, bowling greens, athletics tracks and other outdoor sports areas</td></tr>
<tr><td>Equipped/designated play areas</td><td>0.25 ha</td><td>Local Area for Play (LAP) and Locally Equipped Areas for Play (LEAP) aimed at children who can play independently, as well as</td></tr>
</table></td><td>There are no LSEs of this policy on European sites.
This is a development management policy that set criteria for the provision of outdoor space and allotments and community growing.
The policy does not specify any quantum or location of housing and / or employment development.
Overall, there are no impact pathways present and Policy CI2 is screened out from AA.</td></tr>
</table>

Policy	Text				Assessment
				Neighbourhood Equipped Areas of Play (NEAP)	
		Other outdoor provision	0.3ha	All weather multi-use games areas (MUGA) including skateboard parks	
		Sub total	3.35ha		
	INFORMAL OUTDOOR SPACE	Parks and gardens	0.8ha	Green spaces including urban parks, country parks, forest parks and formal gardens	
		Amenity green space	0.6ha	Informal recreation spaces, public squares, communal green spaces in and around housing, village greens	
		Natural and semi -natural space	2.0ha	Woodland, scrub, grassland and open access land	
		Sub total	3.4ha		
	ALLOTMENTS & COMMUNITY GROWING	Allotments & Community growing	0.3ha	Allotments, community gardens and community orchards	

Policy	Text	Assessment
Policy CI3 – Safeguarding Existing Recreational Facilities, Public Open Spaces and Allotments/Community Growing	Development proposals that involve the loss of land and facilities with recreational, open space, allotments and community growing uses will only be permitted where: a) Alternative provision of at least equivalent community benefit is made available in the locality by the developer on a site acceptable to the local planning authority; or b) There is, and would be, an excess of accessible recreational facilities, public open space and allotments/community growing areas in the locality having regard to the standard as set out in Policy CI2.	There are no LSEs of this policy on European sites. This is a development management policy that set criteria for developments resulting in the loss of land and recreational facilities. The policy does not specify any quantum or location of housing and / or employment development. Overall, there are no impact pathways present and Policy CI3 is screened out from AA.
Policy CI4 – Areas of Amenity Importance	Areas of Amenity Importance are identified on the Proposals Map. Development proposals that lead to the loss of Areas of Amenity Importance will not be permitted.	There are no LSEs of this policy on European sites. This is a development management policy that protects areas of Amenity Importance. The policy does not specify any quantum or location of housing and / or employment development. Overall, there are no impact pathways present and Policy CI4 is screened out from AA.
Minerals		
Strategic Policy S16 – Sustainable Minerals Management	The Council will sustainably manage its mineral resources by: i) Safeguarding known/potential land won sand and gravel, sandstone and limestone resources for future possible use; ii) Maintaining a minimum 10-year bank of crushed rock reserves throughout the Plan period in line with the requirements of the latest South Wales Regional Aggregates Working Party Regional Technical Statement on Aggregates; and iii) Encouraging the efficient and appropriate use of high-quality minerals and maximising the potential for the use of secondary and recycled aggregates as an alternative to primary won resources.	There are no LSEs of this policy on European sites. This is a development management policy that protects areas of value as mineral resources. The policy does not specify any quantum or location of housing and / or employment development. Overall, there are no impact pathways present and Policy S16 is screened out from AA.

Policy	Text	Assessment
Policy M1 – Local Building and Walling Stone	Proposals for new or the re-opening of small-scale quarries for building and walling stone for local conservation and heritage projects or new build to meet any unmet need will be permitted, subject to national planning policy and detailed planning considerations.	There are no LSEs of this policy on European sites. This is a development management policy that permits development of small quarries subject to national planning policies. The policy does not specify any quantum or location of housing and / or employment development. Overall, there are no impact pathways present and Policy M1 is screened out from AA.
Policy M2 – Minerals Safeguarding Areas	Development proposals which may impact on the minerals safeguarding areas shown on the Proposals Map will be considered against the following requirements, as applicable: a) 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. b) Proposals for development uses of a temporary nature within identified mineral safeguarding areas will not be approved unless they can be completed and the site restored to a condition that does not inhibit mineral extraction within the timescale that the mineral is likely to be needed.	There are no LSEs of this policy on European sites. This is a development management policy that protects the mineral safeguarding zones from development. The policy does not specify any quantum or location of housing and / or employment development. Overall, there are no impact pathways present and Policy M2 is screened out from AA.

Policy	Text	Assessment
Policy M3 – Mineral Site Buffer Zones	Development proposals for sensitive or minerals development will not be permitted within the mineral site buffer zones identified on the Proposals Map.	There are no LSEs of this policy on European sites. This is a development management policy that prevents development proposals with the mineral site buffer zones. The policy does not specify any quantum or location of housing and / or employment development. Overall, there are no impact pathways present and Policy M3 is screened out from AA.
Waste		
Strategic Policy S17 – Sustainable Waste Management	To facilitate the delivery of sustainable management of waste the Plan will: i) Require waste proposals to conform to the principle of the waste hierarchy, supporting those that move waste up the hierarchy; ii) Support an integrated and adequate network of waste management installations that has regard to the nearest appropriate installation concept and self-sufficiency principles where necessary; iii) Identify suitable allocated and protected Class B2 industrial sites that are appropriate for in-building waste management treatment facilities, subject to detailed planning considerations; iv) Support the circular economy by encouraging the minimisation of waste production and the use of reused and recycled materials in the design, construction and demolition stages of development; and v) Ensure that provision is made for the sustainable management, sorting, storage and collection of waste in all new development.	There are no LSEs of this policy on European sites. This is a policy requiring waste to be sustainably managed with measures implemented to minimise the creation of waste. The policy does not specify any quantum or location of housing and / or employment development. Overall, there are no impact pathways present and Policy S17 is screened out from AA.

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Policy	Text	Assessment
Policy W1 – Waste Management Facilities	Proposals for waste management facilities, except those involving the final deposit of waste on land at the site or open windrow composting, will be permitted within industrial sites (Class B2 of the Town and Country Planning Use Classes Order 1987) subject to detailed planning considerations, other RLDP policies and national and regional considerations. Where such proposals cannot be accommodated on existing or proposed Class B2 industrial sites they will be permitted provided that all the following conditions are met: a) The proposal site is within settlement boundaries or existing and proposed industrial/business sites; and There is a demonstrable need for the type and scale of development in that location. All proposals for waste management facilities should also comply with the following criteria: i) Where energy is recovered as part of the waste management process the means of access to the appropriate national grid or identified end user is demonstrated; ii) Where appropriate, the maximum possible use is made of non-road transportation for the receipt of the waste arisings and the distribution of the output products; iii) There is no processing and no substantial storage of waste material in the open air; and iv) The proposals are compatible with adjoining land uses. Development of sustainable waste management facilities in appropriate open countryside locations, including open windrow composting and anaerobic digestion, will be supported subject to detailed planning considerations.	There are no LSEs of this policy on European sites. This is a development management policy that sets out the criteria for considering waste management proposals . The policy does not specify any quantum or location of housing and / or employment development. Overall, there are no impact pathways present and Policy W1 is screened out from AA.
Policy W2 – Agricultural Land – Disposal of Inert Waste	Proposals to deposit inert waste on an agricultural holding that has been brought in from elsewhere for the purpose of agricultural improvement will only be permitted where: a) A significant improvement in the agricultural land classification grade of the land will be achieved; b) It can be demonstrated that the improvement sought is essential for the purposes of agriculture within the holding and cannot be achieved by means other than by deposit of waste; c) The proposal involves depositing the minimum volume of waste consistent with achieving the agricultural land improvements sought; and d) Waste material capable of being economically recycled is not deposited on site.	There are no LSEs of this policy on European sites. This is a development management policy that controls the deposition of inert waste on agricultural land. The policy does not specify any quantum or location of housing and / or employment development. Overall, there are no impact pathways present and Policy W2 is screened out from AA.

<table>
<tr><th>Policy</th><th>Text</th><th>Assessment</th></tr>
<tr>
<td>Policy W3 – Identified Waste Management Sites</td>
<td>The following sites are identified as having potential for the location of in-building waste management facilities, subject to detailed planning considerations:
<table>
<tr><th>Site ref</th><th>Site Name</th><th>Area (Ha)</th></tr>
<tr><td>W3a</td><td>Raglan Enterprise Park, Raglan</td><td>1.5</td></tr>
<tr><td>W3b</td><td>Land West of Raglan, Raglan</td><td>4.5</td></tr>
<tr><td>W3c</td><td>Newhouse Farm, Chepstow</td><td>2.5</td></tr>
<tr><td>W3d</td><td>Quay Point, Magor</td><td>14</td></tr>
<tr><td>W3e</td><td>Gwent Euro Park, Magor</td><td>7</td></tr>
<tr><td>W3f</td><td>Land Adjoining Oak Grove Farm, Caldicot</td><td>6</td></tr>
<tr><td>W3g</td><td>Existing Waste Facility - Five Lanes, Caerwent</td><td>2.57</td></tr>
<tr><td>W3h</td><td>Existing Llanfoist Civic and Transfer Station</td><td>1.2</td></tr>
<tr><td colspan="2">Total</td><td>39.27</td></tr>
</table>
</td>
<td>Potential likely significant effects on European sites.
Although this policy states that suitability of these sites for waste uses will be subject to detailed planning considerations, it does indicate they are potentially suitable.

Potential impact pathways are present:
• Atmospheric pollution
• Recreational pressure
• Loss of functionally linked land
• Water quality
• Water quantity, level and flow

This policy is therefore taken forward to appropriate assessment.</td>
</tr>
</table>

Appendix C Air quality modelling

Air Quality Modelling Results

Transect / Receptor	Total Annual Mean NOx (µg/m3)				Total Annual Mean NH3 (µg/m3)				Total Annual Mean N Dep (kgN/ha/yr)				Total Annual Mean N Acid Dep (keq/ha/yr)			
	2024	2033	2033	2033	2024	2033	2033	2033	2024	2033	2033	2033	2024	2033	2033	2033
	Base	FB	DM	DS	Base	FB	DM	DS	Base	FB	DM	DS	Base	FB	DM	DS
E01a_3.5m	8.39	6.91	6.92	6.93	1.62	1.62	1.62	1.62	13.98	13.32	13.32	13.33	1.00	0.95	0.95	0.95
E01a_10m	8.40	6.91	6.92	6.93	1.62	1.62	1.62	1.62	13.98	13.32	13.32	13.33	1.00	0.95	0.95	0.95
E01a_20m	8.41	6.92	6.93	6.94	1.62	1.62	1.62	1.62	13.98	13.32	13.33	13.34	1.00	0.95	0.95	0.95
E01a_30m	8.44	6.93	6.93	6.94	1.62	1.62	1.62	1.62	13.99	13.33	13.33	13.34	1.00	0.95	0.95	0.95
E01a_40m	8.47	6.93	6.94	6.95	1.62	1.62	1.62	1.62	14.00	13.34	13.34	13.35	1.00	0.95	0.95	0.95
E01a_50m	8.51	6.94	6.95	6.97	1.62	1.62	1.62	1.62	14.02	13.35	13.35	13.37	1.00	0.95	0.95	0.95
E01a_60m	8.56	6.96	6.96	6.98	1.63	1.62	1.62	1.63	14.03	13.36	13.37	13.38	1.00	0.95	0.95	0.96
E01a_70m	8.60	6.97	6.98	6.99	1.63	1.62	1.63	1.63	14.05	13.37	13.38	13.39	1.00	0.95	0.96	0.96
E01a_80m	8.63	6.98	6.99	7.00	1.63	1.63	1.63	1.63	14.06	13.38	13.39	13.40	1.00	0.96	0.96	0.96
E01a_90m	8.67	6.98	7.00	7.01	1.63	1.63	1.63	1.63	14.07	13.38	13.39	13.41	1.01	0.96	0.96	0.96
E01a_100m	8.69	6.99	7.00	7.02	1.63	1.63	1.63	1.63	14.08	13.39	13.40	13.42	1.01	0.96	0.96	0.96
E01a_110m	8.71	6.99	7.01	7.03	1.63	1.63	1.63	1.63	14.09	13.39	13.40	13.42	1.01	0.96	0.96	0.96
E01a_120m	8.72	7.00	7.01	7.03	1.64	1.63	1.63	1.64	14.09	13.40	13.41	13.43	1.01	0.96	0.96	0.96
E01a_130m	8.72	7.00	7.01	7.03	1.64	1.63	1.63	1.64	14.09	13.40	13.41	13.43	1.01	0.96	0.96	0.96
E01a_140m	8.73	7.00	7.01	7.03	1.64	1.63	1.63	1.64	14.09	13.40	13.41	13.43	1.01	0.96	0.96	0.96
E01a_150m	8.73	7.00	7.01	7.03	1.64	1.63	1.63	1.64	14.09	13.40	13.41	13.43	1.01	0.96	0.96	0.96
E01a_160m	8.72	7.00	7.01	7.03	1.64	1.63	1.63	1.64	14.09	13.40	13.41	13.43	1.01	0.96	0.96	0.96
E01a_170m	8.72	7.00	7.01	7.03	1.64	1.63	1.63	1.64	14.09	13.40	13.41	13.43	1.01	0.96	0.96	0.96
E01a_180m	8.71	7.00	7.01	7.03	1.63	1.63	1.63	1.63	14.09	13.39	13.41	13.42	1.01	0.96	0.96	0.96
E01a_190m	8.71	6.99	7.01	7.03	1.63	1.63	1.63	1.63	14.08	13.39	13.40	13.42	1.01	0.96	0.96	0.96
E01a_200m	8.70	6.99	7.00	7.02	1.63	1.63	1.63	1.63	14.08	13.39	13.40	13.42	1.01	0.96	0.96	0.96
E01b_6.5m	8.39	6.91	6.92	6.93	1.62	1.62	1.62	1.62	13.98	13.32	13.32	13.33	1.00	0.95	0.95	0.95
E01b_10m	8.39	6.91	6.92	6.93	1.62	1.62	1.62	1.62	13.98	13.32	13.32	13.33	1.00	0.95	0.95	0.95
E01b_20m	8.40	6.92	6.92	6.93	1.62	1.62	1.62	1.62	13.98	13.32	13.32	13.33	1.00	0.95	0.95	0.95
E01b_30m	8.41	6.92	6.93	6.94	1.62	1.62	1.62	1.62	13.98	13.32	13.33	13.34	1.00	0.95	0.95	0.95
E01b_40m	8.43	6.92	6.93	6.94	1.62	1.62	1.62	1.62	13.99	13.32	13.33	13.34	1.00	0.95	0.95	0.95
E01b_50m	8.44	6.93	6.93	6.94	1.62	1.62	1.62	1.62	13.99	13.33	13.33	13.35	1.00	0.95	0.95	0.95
E01b_60m	8.46	6.93	6.94	6.95	1.62	1.62	1.62	1.62	14.00	13.33	13.34	13.35	1.00	0.95	0.95	0.95
E01b_70m	8.47	6.93	6.94	6.95	1.62	1.62	1.62	1.62	14.00	13.34	13.34	13.35	1.00	0.95	0.95	0.95
E01b_80m	8.48	6.94	6.94	6.96	1.62	1.62	1.62	1.62	14.01	13.34	13.35	13.36	1.00	0.95	0.95	0.95
E01b_90m	8.49	6.94	6.95	6.96	1.62	1.62	1.62	1.62	14.01	13.34	13.35	13.36	1.00	0.95	0.95	0.95
E01b_100m	8.50	6.94	6.95	6.96	1.62	1.62	1.62	1.62	14.01	13.34	13.35	13.36	1.00	0.95	0.95	0.95
E01b_110m	8.50	6.94	6.95	6.96	1.62	1.62	1.62	1.62	14.01	13.34	13.35	13.36	1.00	0.95	0.95	0.95
E01b_120m	8.50	6.94	6.95	6.96	1.62	1.62	1.62	1.62	14.01	13.34	13.35	13.36	1.00	0.95	0.95	0.95
E01b_130m	8.50	6.94	6.95	6.96	1.62	1.62	1.62	1.62	14.01	13.34	13.35	13.36	1.00	0.95	0.95	0.95
E01b_140m	8.50	6.94	6.95	6.96	1.62	1.62	1.62	1.62	14.01	13.34	13.35	13.36	1.00	0.95	0.95	0.95
E01b_150m	8.49	6.94	6.95	6.96	1.62	1.62	1.62	1.62	14.01	13.34	13.35	13.36	1.00	0.95	0.95	0.95
E01b_160m	8.49	6.94	6.95	6.96	1.62	1.62	1.62	1.62	14.01	13.34	13.35	13.36	1.00	0.95	0.95	0.95
E01b_170m	8.48	6.94	6.94	6.96	1.62	1.62	1.62	1.62	14.01	13.34	13.35	13.36	1.00	0.95	0.95	0.95
E01b_180m	8.47	6.94	6.94	6.96	1.62	1.62	1.62	1.62	14.00	13.34	13.34	13.35	1.00	0.95	0.95	0.95

E01b_190m	8.47	6.93	6.94	6.95	1.62	1.62	1.62	1.62	14.00	13.33	13.34	13.35	1.00	0.95	0.95	0.95
E01b_200m	8.46	6.93	6.94	6.95	1.62	1.62	1.62	1.62	14.00	13.33	13.34	13.35	1.00	0.95	0.95	0.95
E02a_2.3m	8.12	6.68	6.69	6.70	1.61	1.60	1.60	1.61	14.23	13.57	13.58	13.59	1.02	0.97	0.97	0.97
E02a_10m	8.13	6.68	6.69	6.70	1.61	1.60	1.61	1.61	14.23	13.57	13.58	13.59	1.02	0.97	0.97	0.97
E02a_20m	8.14	6.68	6.69	6.70	1.61	1.60	1.61	1.61	14.24	13.58	13.58	13.59	1.02	0.97	0.97	0.97
E02a_30m	8.17	6.69	6.70	6.71	1.61	1.61	1.61	1.61	14.25	13.58	13.59	13.60	1.02	0.97	0.97	0.97
E02a_40m	8.20	6.70	6.71	6.72	1.61	1.61	1.61	1.61	14.26	13.59	13.60	13.61	1.02	0.97	0.97	0.97
E02a_50m	8.24	6.71	6.72	6.73	1.61	1.61	1.61	1.61	14.27	13.60	13.61	13.62	1.02	0.97	0.97	0.97
E02a_60m	8.28	6.72	6.73	6.74	1.61	1.61	1.61	1.61	14.29	13.61	13.62	13.63	1.02	0.97	0.97	0.97
E02a_70m	8.32	6.73	6.74	6.76	1.62	1.61	1.61	1.62	14.30	13.62	13.63	13.64	1.02	0.97	0.97	0.97
E02a_80m	8.35	6.74	6.75	6.77	1.62	1.61	1.62	1.62	14.31	13.63	13.64	13.66	1.02	0.97	0.97	0.98
E02a_90m	8.38	6.75	6.76	6.78	1.62	1.62	1.62	1.62	14.32	13.64	13.65	13.66	1.02	0.97	0.97	0.98
E02a_100m	8.41	6.75	6.76	6.78	1.62	1.62	1.62	1.62	14.33	13.64	13.65	13.67	1.02	0.97	0.98	0.98
E02a_110m	8.42	6.76	6.77	6.79	1.62	1.62	1.62	1.62	14.34	13.64	13.66	13.68	1.02	0.97	0.98	0.98
E02a_120m	8.43	6.76	6.77	6.79	1.62	1.62	1.62	1.62	14.34	13.65	13.66	13.68	1.02	0.97	0.98	0.98
E02a_130m	8.44	6.76	6.77	6.79	1.62	1.62	1.62	1.62	14.34	13.65	13.66	13.68	1.02	0.97	0.98	0.98
E02a_140m	8.44	6.76	6.77	6.79	1.62	1.62	1.62	1.62	14.34	13.65	13.66	13.68	1.02	0.98	0.98	0.98
E02a_150m	8.44	6.76	6.77	6.79	1.62	1.62	1.62	1.62	14.34	13.65	13.66	13.68	1.02	0.97	0.98	0.98
E02a_160m	8.44	6.76	6.77	6.79	1.62	1.62	1.62	1.62	14.34	13.65	13.66	13.68	1.02	0.97	0.98	0.98
E02a_170m	8.43	6.76	6.77	6.79	1.62	1.62	1.62	1.62	14.34	13.65	13.66	13.68	1.02	0.97	0.98	0.98
E02a_180m	8.42	6.76	6.77	6.79	1.62	1.62	1.62	1.62	14.34	13.64	13.66	13.67	1.02	0.97	0.98	0.98
E02a_190m	8.42	6.75	6.77	6.79	1.62	1.62	1.62	1.62	14.33	13.64	13.65	13.67	1.02	0.97	0.98	0.98
E02a_200m	8.41	6.75	6.76	6.78	1.62	1.62	1.62	1.62	14.33	13.64	13.65	13.67	1.02	0.97	0.98	0.98
E02b_4.3m	8.12	6.68	6.69	6.69	1.61	1.60	1.60	1.61	14.23	13.57	13.58	13.59	1.02	0.97	0.97	0.97
E02b_10m	8.12	6.68	6.69	6.70	1.61	1.60	1.61	1.61	14.23	13.57	13.58	13.59	1.02	0.97	0.97	0.97
E02b_20m	8.13	6.68	6.69	6.70	1.61	1.60	1.61	1.61	14.24	13.57	13.58	13.59	1.02	0.97	0.97	0.97
E02b_30m	8.14	6.69	6.69	6.70	1.61	1.60	1.61	1.61	14.24	13.58	13.58	13.59	1.02	0.97	0.97	0.97
E02b_40m	8.16	6.69	6.70	6.71	1.61	1.61	1.61	1.61	14.24	13.58	13.59	13.60	1.02	0.97	0.97	0.97
E02b_50m	8.17	6.69	6.70	6.71	1.61	1.61	1.61	1.61	14.25	13.58	13.59	13.60	1.02	0.97	0.97	0.97
E02b_60m	8.18	6.70	6.70	6.71	1.61	1.61	1.61	1.61	14.25	13.59	13.59	13.60	1.02	0.97	0.97	0.97
E02b_70m	8.20	6.70	6.71	6.72	1.61	1.61	1.61	1.61	14.26	13.59	13.60	13.61	1.02	0.97	0.97	0.97
E02b_80m	8.21	6.70	6.71	6.72	1.61	1.61	1.61	1.61	14.26	13.59	13.60	13.61	1.02	0.97	0.97	0.97
E02b_90m	8.22	6.70	6.71	6.73	1.61	1.61	1.61	1.61	14.27	13.60	13.60	13.62	1.02	0.97	0.97	0.97
E02b_100m	8.23	6.71	6.71	6.73	1.61	1.61	1.61	1.61	14.27	13.60	13.61	13.62	1.02	0.97	0.97	0.97
E02b_110m	8.23	6.71	6.72	6.73	1.61	1.61	1.61	1.61	14.27	13.60	13.61	13.62	1.02	0.97	0.97	0.97
E02b_120m	8.23	6.71	6.72	6.73	1.61	1.61	1.61	1.61	14.27	13.60	13.61	13.62	1.02	0.97	0.97	0.97
E02b_130m	8.23	6.71	6.72	6.73	1.61	1.61	1.61	1.61	14.27	13.60	13.61	13.62	1.02	0.97	0.97	0.97
E02b_140m	8.23	6.71	6.72	6.73	1.61	1.61	1.61	1.61	14.27	13.60	13.61	13.62	1.02	0.97	0.97	0.97
E02b_150m	8.23	6.71	6.72	6.73	1.61	1.61	1.61	1.61	14.27	13.60	13.61	13.62	1.02	0.97	0.97	0.97
E02b_160m	8.22	6.71	6.71	6.73	1.61	1.61	1.61	1.61	14.27	13.60	13.60	13.62	1.02	0.97	0.97	0.97
E02b_170m	8.22	6.70	6.71	6.73	1.61	1.61	1.61	1.61	14.26	13.59	13.60	13.62	1.02	0.97	0.97	0.97
E02b_180m	8.21	6.70	6.71	6.72	1.61	1.61	1.61	1.61	14.26	13.59	13.60	13.61	1.02	0.97	0.97	0.97
E02b_190m	8.21	6.70	6.71	6.72	1.61	1.61	1.61	1.61	14.26	13.59	13.60	13.61	1.02	0.97	0.97	0.97
E02b_200m	8.20	6.70	6.71	6.72	1.61	1.61	1.61	1.61	14.26	13.59	13.60	13.61	1.02	0.97	0.97	0.97

E03_4m	6.75	4.73	4.78	4.91	1.59	1.57	1.58	1.60	29.77	28.71	28.80	29.02	2.13	2.05	2.06	2.07
E03_10m	5.72	4.45	4.48	4.54	1.52	1.51	1.51	1.53	29.06	28.22	28.26	28.37	2.08	2.02	2.02	2.03
E03_20m	5.25	4.33	4.34	4.38	1.49	1.48	1.49	1.49	28.75	28.01	28.03	28.09	2.05	2.00	2.00	2.01
E03_30m	5.07	4.28	4.29	4.31	1.48	1.47	1.48	1.48	28.63	27.92	27.94	27.98	2.05	1.99	2.00	2.00
E03_40m	4.97	4.25	4.26	4.28	1.47	1.47	1.47	1.47	28.57	27.88	27.89	27.92	2.04	1.99	1.99	1.99
E03_50m	4.91	4.24	4.24	4.26	1.47	1.47	1.47	1.47	28.53	27.86	27.86	27.89	2.04	1.99	1.99	1.99
E03_60m	4.87	4.22	4.23	4.24	1.47	1.46	1.46	1.47	28.51	27.84	27.84	27.86	2.04	1.99	1.99	1.99
E03_70m	4.84	4.22	4.22	4.23	1.46	1.46	1.46	1.47	28.49	27.83	27.83	27.85	2.03	1.99	1.99	1.99
E03_80m	4.82	4.21	4.21	4.22	1.46	1.46	1.46	1.46	28.48	27.82	27.82	27.84	2.03	1.99	1.99	1.99
E03_90m	4.80	4.21	4.21	4.22	1.46	1.46	1.46	1.46	28.47	27.81	27.81	27.83	2.03	1.99	1.99	1.99
E03_100m	4.79	4.20	4.20	4.21	1.46	1.46	1.46	1.46	28.46	27.80	27.81	27.82	2.03	1.99	1.99	1.99
E03_110m	4.77	4.20	4.20	4.21	1.46	1.46	1.46	1.46	28.45	27.80	27.80	27.81	2.03	1.99	1.99	1.99
E03_120m	4.76	4.20	4.20	4.20	1.46	1.46	1.46	1.46	28.44	27.79	27.80	27.80	2.03	1.99	1.99	1.99
E03_130m	4.75	4.19	4.19	4.20	1.46	1.46	1.46	1.46	28.43	27.79	27.79	27.80	2.03	1.98	1.98	1.99
E03_140m	4.74	4.19	4.19	4.20	1.46	1.46	1.46	1.46	28.43	27.78	27.79	27.79	2.03	1.98	1.98	1.99
E03_150m	4.74	4.19	4.19	4.19	1.46	1.46	1.46	1.46	28.43	27.78	27.78	27.79	2.03	1.98	1.98	1.98
E03_160m	4.73	4.19	4.19	4.19	1.46	1.46	1.46	1.46	28.42	27.78	27.78	27.79	2.03	1.98	1.98	1.98
E03_170m	4.72	4.18	4.19	4.19	1.46	1.46	1.46	1.46	28.42	27.78	27.78	27.78	2.03	1.98	1.98	1.98
E03_180m	4.72	4.18	4.18	4.19	1.46	1.46	1.46	1.46	28.42	27.78	27.78	27.78	2.03	1.98	1.98	1.98
E03_190m	4.71	4.18	4.18	4.19	1.46	1.46	1.46	1.46	28.41	27.78	27.78	27.78	2.03	1.98	1.98	1.98
E03_200m	4.71	4.18	4.18	4.18	1.46	1.46	1.46	1.46	28.41	27.77	27.77	27.78	2.03	1.98	1.98	1.98
E04_6.5m	6.28	4.77	4.80	4.85	1.68	1.67	1.68	1.69	28.96	28.09	28.13	28.21	2.07	2.01	2.01	2.01
E04_10m	6.04	4.70	4.73	4.76	1.67	1.66	1.66	1.67	28.79	27.97	28.01	28.07	2.06	2.00	2.00	2.00
E04_20m	5.66	4.60	4.62	4.64	1.64	1.64	1.64	1.64	28.54	27.80	27.82	27.85	2.04	1.99	1.99	1.99
E04_30m	5.48	4.56	4.57	4.58	1.63	1.63	1.63	1.63	28.43	27.72	27.73	27.75	2.03	1.98	1.98	1.98
E04_40m	5.39	4.53	4.54	4.55	1.63	1.62	1.63	1.63	28.37	27.68	27.69	27.71	2.03	1.98	1.98	1.98
E04_50m	5.33	4.52	4.52	4.53	1.62	1.62	1.62	1.62	28.33	27.65	27.66	27.68	2.02	1.98	1.98	1.98
E04_60m	5.29	4.51	4.51	4.52	1.62	1.62	1.62	1.62	28.31	27.63	27.64	27.65	2.02	1.97	1.97	1.98
E04_70m	5.26	4.50	4.50	4.51	1.62	1.62	1.62	1.62	28.29	27.62	27.63	27.63	2.02	1.97	1.97	1.97
E04_80m	5.24	4.49	4.50	4.50	1.62	1.62	1.62	1.62	28.27	27.61	27.62	27.62	2.02	1.97	1.97	1.97
E04_90m	5.22	4.49	4.49	4.50	1.62	1.62	1.62	1.62	28.26	27.60	27.61	27.62	2.02	1.97	1.97	1.97
E04_100m	5.20	4.48	4.49	4.49	1.62	1.62	1.62	1.62	28.25	27.60	27.60	27.61	2.02	1.97	1.97	1.97
E04_110m	5.19	4.48	4.48	4.49	1.62	1.61	1.61	1.62	28.24	27.59	27.59	27.60	2.02	1.97	1.97	1.97
E04_120m	5.17	4.48	4.48	4.48	1.61	1.61	1.61	1.61	28.23	27.59	27.59	27.59	2.02	1.97	1.97	1.97
E04_130m	5.16	4.47	4.47	4.48	1.61	1.61	1.61	1.61	28.23	27.58	27.58	27.59	2.02	1.97	1.97	1.97
E04_140m	5.15	4.47	4.47	4.47	1.61	1.61	1.61	1.61	28.22	27.58	27.58	27.58	2.02	1.97	1.97	1.97
E04_150m	5.15	4.47	4.47	4.47	1.61	1.61	1.61	1.61	28.22	27.57	27.58	27.58	2.02	1.97	1.97	1.97
E04_160m	5.14	4.47	4.47	4.47	1.61	1.61	1.61	1.61	28.21	27.57	27.57	27.58	2.02	1.97	1.97	1.97
E04_170m	5.13	4.46	4.47	4.47	1.61	1.61	1.61	1.61	28.21	27.57	27.57	27.57	2.01	1.97	1.97	1.97
E04_180m	5.13	4.46	4.46	4.47	1.61	1.61	1.61	1.61	28.21	27.57	27.57	27.57	2.01	1.97	1.97	1.97
E04_190m	5.12	4.46	4.46	4.46	1.61	1.61	1.61	1.61	28.21	27.57	27.57	27.57	2.01	1.97	1.97	1.97
E04_200m	5.12	4.46	4.46	4.46	1.61	1.61	1.61	1.61	28.20	27.57	27.57	27.57	2.01	1.97	1.97	1.97
E05_53.1m	9.13	6.10	6.16	6.19	1.82	1.79	1.80	1.81	29.96	28.84	28.92	28.97	2.14	2.06	2.07	2.07
E05_60m	8.83	6.02	6.07	6.10	1.80	1.78	1.79	1.79	29.77	28.70	28.78	28.82	2.13	2.05	2.06	2.06

E05_70m	8.52	5.94	5.98	6.01	1.78	1.76	1.77	1.77	29.57	28.57	28.63	28.67	2.11	2.04	2.05	2.05
E05_80m	8.26	5.87	5.91	5.93	1.76	1.75	1.76	1.76	29.41	28.46	28.51	28.55	2.10	2.03	2.04	2.04
E05_90m	8.03	5.81	5.84	5.86	1.75	1.74	1.74	1.75	29.27	28.37	28.41	28.44	2.09	2.03	2.03	2.03
E05_100m	7.83	5.76	5.78	5.80	1.74	1.73	1.73	1.74	29.16	28.29	28.33	28.35	2.08	2.02	2.02	2.03
E05_110m	7.66	5.71	5.74	5.75	1.73	1.72	1.73	1.73	29.06	28.22	28.26	28.28	2.08	2.02	2.02	2.02
E05_120m	7.52	5.67	5.70	5.71	1.72	1.72	1.72	1.72	28.98	28.17	28.20	28.22	2.07	2.01	2.01	2.02
E05_130m	7.40	5.64	5.66	5.67	1.72	1.71	1.71	1.72	28.91	28.13	28.15	28.17	2.07	2.01	2.01	2.01
E05_140m	7.30	5.62	5.63	5.64	1.71	1.71	1.71	1.71	28.86	28.09	28.11	28.12	2.06	2.01	2.01	2.01
E05_150m	7.21	5.59	5.61	5.62	1.71	1.70	1.71	1.71	28.81	28.06	28.08	28.09	2.06	2.00	2.01	2.01
E05_160m	7.14	5.57	5.59	5.60	1.70	1.70	1.70	1.70	28.77	28.04	28.05	28.06	2.05	2.00	2.00	2.00
E05_170m	7.07	5.56	5.57	5.58	1.70	1.70	1.70	1.70	28.73	28.01	28.03	28.04	2.05	2.00	2.00	2.00
E05_180m	7.02	5.54	5.55	5.56	1.70	1.70	1.70	1.70	28.70	27.99	28.00	28.01	2.05	2.00	2.00	2.00
E05_190m	6.97	5.53	5.54	5.54	1.70	1.69	1.70	1.70	28.68	27.98	27.99	28.00	2.05	2.00	2.00	2.00
E05_200m	6.93	5.52	5.53	5.53	1.70	1.69	1.69	1.69	28.66	27.96	27.97	27.98	2.05	2.00	2.00	2.00

Transect / Receptor	Total Annual Mean NOx (µg/m3)				Total Annual Mean NH3 (µg/m3)				Total Annual Mean N Dep (kgN/ha/yr)				Total Annual Mean N Acid Dep (keq/ha/yr)			
	2024	2033	2033	2033	2024	2033	2033	2033	2024	2033	2033	2033	2024	2033	2033	2033
	Base	FB	DM	DS	Base	FB	DM	DS	Base	FB	DM	DS	Base	FB	DM	DS
E06_79.5m	6.51	5.15	5.17	5.18	0.95	0.94	0.95	0.95	26.38	25.58	25.61	25.62	1.88	1.83	1.83	1.83
E06_80m	6.51	5.15	5.17	5.18	0.95	0.94	0.95	0.95	26.38	25.58	25.60	25.62	1.88	1.83	1.83	1.83
E06_90m	6.41	5.12	5.14	5.15	0.95	0.94	0.94	0.94	26.32	25.54	25.56	25.58	1.88	1.82	1.83	1.83
E06_100m	6.32	5.10	5.11	5.12	0.94	0.93	0.94	0.94	26.28	25.51	25.53	25.54	1.88	1.82	1.82	1.82
E06_110m	6.25	5.08	5.09	5.10	0.94	0.93	0.93	0.94	26.24	25.48	25.50	25.51	1.87	1.82	1.82	1.82
E06_120m	6.18	5.06	5.07	5.08	0.93	0.93	0.93	0.93	26.20	25.46	25.47	25.48	1.87	1.82	1.82	1.82
E06_130m	6.12	5.04	5.06	5.06	0.93	0.93	0.93	0.93	26.17	25.44	25.45	25.46	1.87	1.82	1.82	1.82
E06_140m	6.07	5.03	5.04	5.05	0.93	0.92	0.93	0.93	26.14	25.42	25.43	25.44	1.87	1.82	1.82	1.82
E06_150m	6.03	5.02	5.03	5.03	0.93	0.92	0.92	0.93	26.12	25.40	25.42	25.42	1.87	1.81	1.82	1.82
E06_160m	5.99	5.01	5.02	5.02	0.93	0.92	0.92	0.92	26.10	25.39	25.40	25.41	1.86	1.81	1.81	1.81
E06_170m	5.96	5.00	5.01	5.01	0.92	0.92	0.92	0.92	26.08	25.38	25.39	25.40	1.86	1.81	1.81	1.81
E06_180m	5.93	4.99	5.00	5.00	0.92	0.92	0.92	0.92	26.07	25.37	25.38	25.39	1.86	1.81	1.81	1.81
E06_190m	5.90	4.98	4.99	5.00	0.92	0.92	0.92	0.92	26.06	25.36	25.37	25.37	1.86	1.81	1.81	1.81
E06_200m	5.88	4.98	4.99	4.99	0.92	0.92	0.92	0.92	26.04	25.35	25.36	25.37	1.86	1.81	1.81	1.81
E07a_5m	14.44	7.50	7.70	7.79	1.39	1.31	1.35	1.36	31.29	29.10	29.38	29.52	2.24	2.08	2.10	2.11
E07a_10m	12.56	7.01	7.16	7.22	1.27	1.22	1.24	1.25	30.09	28.27	28.48	28.59	2.15	2.02	2.03	2.04
E07a_20m	10.69	6.50	6.60	6.65	1.16	1.12	1.14	1.15	28.91	27.46	27.61	27.68	2.07	1.96	1.97	1.98
E07a_30m	9.83	6.27	6.35	6.39	1.11	1.08	1.10	1.10	28.39	27.11	27.22	27.27	2.03	1.94	1.94	1.95
E07a_40m	9.29	6.12	6.19	6.22	1.08	1.06	1.07	1.07	28.05	26.87	26.97	27.01	2.00	1.92	1.93	1.93
E07a_50m	8.99	6.04	6.10	6.13	1.06	1.04	1.05	1.05	27.86	26.74	26.83	26.86	1.99	1.91	1.92	1.92
E07a_60m	8.75	5.97	6.03	6.06	1.05	1.03	1.04	1.04	27.71	26.64	26.71	26.75	1.98	1.90	1.91	1.91
E07a_70m	8.54	5.91	5.97	5.99	1.04	1.02	1.03	1.03	27.58	26.54	26.61	26.64	1.97	1.90	1.90	1.90
E07a_80m	8.27	5.85	5.89	5.91	1.02	1.01	1.01	1.02	27.42	26.44	26.50	26.52	1.96	1.89	1.89	1.89
E07a_90m	8.05	5.78	5.83	5.85	1.01	1.00	1.00	1.01	27.30	26.36	26.40	26.43	1.95	1.88	1.89	1.89
E07a_100m	7.87	5.73	5.77	5.79	1.00	0.99	0.99	1.00	27.20	26.29	26.33	26.35	1.94	1.88	1.88	1.88
E07a_110m	7.71	5.69	5.73	5.74	0.99	0.98	0.99	0.99	27.11	26.24	26.28	26.29	1.94	1.87	1.88	1.88

E07a_120m	7.59	5.66	5.69	5.70	0.99	0.98	0.98	0.98	27.05	26.19	26.23	26.25	1.93	1.87	1.87	1.87
E07a_130m	7.47	5.63	5.66	5.67	0.98	0.97	0.98	0.98	26.99	26.16	26.19	26.20	1.93	1.87	1.87	1.87
E07a_140m	7.37	5.60	5.63	5.64	0.98	0.97	0.97	0.98	26.93	26.12	26.15	26.16	1.92	1.87	1.87	1.87
E07a_150m	7.28	5.58	5.60	5.61	0.97	0.97	0.97	0.97	26.89	26.09	26.12	26.13	1.92	1.86	1.87	1.87
E07a_160m	7.21	5.56	5.58	5.59	0.97	0.97	0.97	0.97	26.86	26.07	26.09	26.10	1.92	1.86	1.86	1.86
E07a_170m	7.14	5.54	5.56	5.57	0.97	0.96	0.97	0.97	26.82	26.05	26.07	26.08	1.92	1.86	1.86	1.86
E07a_180m	7.08	5.52	5.54	5.55	0.97	0.96	0.96	0.96	26.79	26.03	26.05	26.06	1.91	1.86	1.86	1.86
E07a_190m	7.03	5.51	5.53	5.53	0.96	0.96	0.96	0.96	26.77	26.01	26.03	26.04	1.91	1.86	1.86	1.86
E07a_200m	6.98	5.49	5.51	5.52	0.96	0.96	0.96	0.96	26.74	26.00	26.01	26.02	1.91	1.86	1.86	1.86
E07b_5m	13.30	7.19	7.35	7.43	1.32	1.26	1.29	1.30	30.59	28.61	28.86	28.97	2.18	2.04	2.06	2.07
E07b_10m	11.60	6.74	6.86	6.92	1.22	1.17	1.19	1.20	29.52	27.88	28.06	28.15	2.11	1.99	2.00	2.01
E07b_20m	10.00	6.30	6.39	6.44	1.13	1.09	1.11	1.11	28.53	27.20	27.33	27.38	2.04	1.94	1.95	1.96
E07b_30m	9.16	6.08	6.15	6.18	1.08	1.05	1.06	1.07	28.01	26.85	26.94	26.99	2.00	1.92	1.92	1.93
E07b_40m	8.63	5.94	5.99	6.02	1.05	1.03	1.04	1.04	27.70	26.64	26.72	26.75	1.98	1.90	1.91	1.91
E07b_50m	8.26	5.84	5.88	5.91	1.03	1.01	1.02	1.02	27.48	26.49	26.55	26.58	1.96	1.89	1.90	1.90
E07b_60m	7.97	5.76	5.80	5.82	1.01	1.00	1.01	1.01	27.31	26.38	26.43	26.45	1.95	1.88	1.89	1.89
E07b_70m	7.76	5.70	5.74	5.75	1.00	0.99	1.00	1.00	27.19	26.29	26.34	26.36	1.94	1.88	1.88	1.88
E07b_80m	7.57	5.65	5.68	5.70	0.99	0.98	0.99	0.99	27.08	26.22	26.26	26.28	1.93	1.87	1.88	1.88
E07b_90m	7.42	5.61	5.64	5.65	0.98	0.98	0.98	0.98	27.00	26.17	26.20	26.21	1.93	1.87	1.87	1.87
E07b_100m	7.29	5.58	5.60	5.61	0.98	0.97	0.97	0.98	26.92	26.12	26.15	26.16	1.92	1.87	1.87	1.87
E07b_110m	7.18	5.55	5.57	5.58	0.97	0.97	0.97	0.97	26.86	26.08	26.10	26.12	1.92	1.86	1.86	1.87
E07b_120m	7.09	5.52	5.54	5.55	0.97	0.96	0.97	0.97	26.82	26.05	26.07	26.08	1.92	1.86	1.86	1.86
E07b_130m	7.01	5.50	5.52	5.53	0.97	0.96	0.96	0.96	26.78	26.02	26.04	26.05	1.91	1.86	1.86	1.86
E07b_140m	6.94	5.49	5.50	5.51	0.96	0.96	0.96	0.96	26.74	26.00	26.02	26.03	1.91	1.86	1.86	1.86
E07b_150m	6.89	5.47	5.48	5.49	0.96	0.96	0.96	0.96	26.71	25.98	25.99	26.00	1.91	1.86	1.86	1.86
E07b_160m	6.84	5.46	5.47	5.48	0.96	0.95	0.96	0.96	26.69	25.96	25.98	25.99	1.91	1.85	1.86	1.86
E07b_170m	6.80	5.45	5.46	5.46	0.96	0.95	0.95	0.95	26.66	25.95	25.96	25.97	1.90	1.85	1.85	1.85
E07b_180m	6.76	5.44	5.45	5.45	0.95	0.95	0.95	0.95	26.65	25.94	25.95	25.96	1.90	1.85	1.85	1.85
E07b_190m	6.72	5.43	5.44	5.44	0.95	0.95	0.95	0.95	26.63	25.93	25.94	25.94	1.90	1.85	1.85	1.85
E07b_200m	6.70	5.42	5.43	5.43	0.95	0.95	0.95	0.95	26.62	25.92	25.93	25.93	1.90	1.85	1.85	1.85

Monmouthshire County Council - Air Quality Modelling

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1. Introduction

1.1 Monmouthshire County Council (MCC) has prepared a Replacement Local Development Plan (RLDP), setting out planned development from 2018 to 2033. The Council has commissioned AECOM Limited to conduct an air quality assessment to inform the Habitats Regulations Assessment (HRA) of the Regulation 18 Local Plan 2033.

1.2 The work presented in this report is to be used to inform the Appropriate Assessment of the HRA. It focuses on the impact of traffic related emissions due to planned development during the Local Plan period on sensitive ecosystems within River Wye, Severn Estuary, Wye Valley Woodlands, Cwm Clydach Woodlands and Usk Bat Sites Special Areas of Conservation (SAC). The River Wye, Cwm Clydach Woodlands and Wye Valley Woodlands SACs are mainly designated for beech and oak forest habitat, whilst the Severn Estuary and Usk Bat Sites SACs are mainly designated for bog, dry heath, sandflats, meadow and woodlands habitat. These habitats are all sensitive to nitrogen and acid deposition due to several reasons, such as soil acidification and toxicity to species (Natural England, 2018). It should be noted that the Cwm Clydach Woodlands and Usk Bat Sites are on the border with the Blaenau Gwent County Borough Council (BGCBC) and MCC areas and include transects in both counties, however, the assessment is of the impact of the MCC RLDP.

1.3 This assessment considers the following four key pollutants shown to affect sensitive ecosystems: ammonia (NH_3), oxides of nitrogen (NO_X), total nitrogen deposition and total acid deposition. All pollutants are considered at receptor points, within transects, up to 200m of the roadside, within the SACs considered in this assessment.

1.4 The main aims of this study are to:

- Identify potentially sensitive ecological receptor locations within the SAC within 200m of roads that are expected to be affected by the Local Plan 2033;
- Predict annual mean NO_X and NH_3 concentrations and nitrogen and acid deposition rates for the following scenarios at selected ecological receptors;
    - Baseline year (2024): represents current air quality situation in 2024;
    - Future Baseline (2033): uses the traffic data from the ‘current baseline’ in 2024, but applies future assessment year vehicle emission factors and background pollutant concentrations to allow for the ‘in combination’ assessment required for the HRA;
    - 2033 ‘Do Minimum’: future assessment year which does not include the influence of planned development from the MCC Local Plan but does allow for strategic planned development in neighbouring local authorities; and
    - 2033 ‘Do Something’: future assessment year which includes the influence of planned development from the MCC Local Plan and from strategic planned development in neighbouring local authorities.
- Determine if there are any exceedances of NO_X and NH_3 critical levels, and nitrogen and acid deposition critical loads within the SAC.

1.5 The results and implications of the modelling outputs are presented in the accompanying HRA of the ‘Monmouthshire Local Plan’. More detail on the Transport Assessment and associated modelling are available separately.

2. Policy Context

Clean Air Strategy

2.1 In 2019, the UK government released its Clean Air Strategy 2019 (Defra, 2019) as part of its 25 Year Environment Plan (Defra, 2018). These documents include targets to reduce emissions of ammonia from farming activities, and nitrogen oxides from combustion processes, and thus reduce the deposition of nitrogen to sensitive ecosystems.

Environment Act

2.2 The Environment Act 2021 (HM Government, 2021) amends the Environment Act 1995 (HM Government, 1995). On 9th November 2021, the Act received Royal Assent after being first introduced to Parliament in January 2020 to address environmental protection and the delivery of the Government's 25 Year Environment Plan. It includes provisions to establish a set of statutory environmental principles to ensure environmental governance through an environmental watchdog, the Office for Environmental Protection (OEP).

2.3 The Secretary of State must publish a review report every five years (as a minimum and with yearly updates to Parliament). The 25 Year Environment Plan has been adopted as the first Environmental Improvement Plan (EIP) of the Environment Act 2021, with long-term legally binding targets being finalised by Defra[1]. The EIP 2023 was published in January 2023 (updated February 2023), building on the 25 Year Environment Plan, and setting out how the delivery of environmental goals will be coordinated with landowners, communities and businesses.

Habitats Regulations Assessment

2.4 While the UK is no longer a member of the EU, a requirement for HRA will continue as set out in the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019.

2.5 The HRA process applies the 'Precautionary Principle'[2] to European sites[3]. Plans and projects can only be permitted having ascertained that there will be no adverse effect on the integrity of the European site(s) in question. To ascertain whether or not site integrity will be affected, an Appropriate Assessment should be undertaken of the Plan or project in question.

2.6 Following evidence gathering, the first stage of any HRA is the screening for Likely Significant Effects (LSEs), a high-level assessment to decide whether the Appropriate Assessment is required. Where it is determined that a conclusion of 'no Likely Significant Effects' cannot be drawn, the analysis proceeds to the Appropriate Assessment.

Other Guidance documents

2.7 Best practice and advice / guidance contained within documents from Natural England (Natural England, 2018), the Institute of Air Quality Management (IAQM) (IAQM, 2020), the Chartered Institute of Ecology and Environmental Management (CIEEM) (CIEEM, 2021) and National Highways (Design Manual for Roads and Bridges DMRB LA105) (DMRB, 2019) have been used to determine the methodology applied, and in the accompanying ecological interpretation of the results.

Critical Levels

2.8 Annual mean critical levels of NO_X and NH_3 are summarised in Table 1. These are concentrations above which adverse effects on ecosystems may occur based on present knowledge. The critical level for NO_X is taken from the EU Ambient Air Quality Directive 2008/50/EU (EU Directives, 2008) which has also

[1] https://www.gov.uk/government/news/update-on-progress-on-environmental-targets

[2] The Precautionary Principle, which is referenced in Article 191 of the Treaty on the Functioning of the European Union, has been defined by the United Nations Educational, Scientific and Cultural Organisation (UNESCO, 2005) as: ***"When human activities may lead to morally unacceptable harm*** [to the environment] ***that is scientifically plausible but uncertain, actions shall be taken to avoid or diminish that harm. The judgement of plausibility should be grounded in scientific analysis".***

[3] https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site - "***A European site is protected by the Conservation of Habitats and Species Regulations 2017 as amended (known as the Habitats Regulations)***". These include Special Areas of Conservation (SACs), Special Protection Areas (SPAs), and Ramsar sites (wetlands of international importance).

been set as the Air Quality Strategy objective for the protection of vegetation and ecosystems and has been incorporated into English legislation.

2.9 The EU Directive (EU Directives, 2008) states that the sampling point to determine compliance should be sited more than 20 km away from agglomerations or more than 5 km away from other built-up areas, industrial installations or motorways or major roads with traffic counts of more than 50,000 vehicles per day, which means that a sampling point must be sited in such a way that is representative of an area of at least 1,000 km^2. Applying the critical level for NO_X to designated nature conservation sites that are located close to busy roads is therefore precautionary.

2.10 The critical levels for NH_3 have not been incorporated into legislation and are a recommendation made by the United Nations Economic Commission for Europe (UNECE) Executive Body for the Convention on Long-Range Transboundary Air Pollution (CLRTAP) (UNECE, 2013).

Table 1: Annual Mean Critical Levels (NO_X and NH_3)

Pollutant	Critical Level
Oxides of nitrogen (NO_X)	30 µg/m^3
Ammonia (NH_3)	3 µg/m^3 for higher plants 1 µg/m^3 for lichens and bryophytes

Planning Policy Wales

2.11 Planning Policy Wales (PPW) sets out the land use planning policies of the Welsh Government.Llwybr Newydd: The Wales Transport Strategy (2021-2040).

2.12 Llwybr Newydd, the Wales Transport Strategy (Llywodraeth Cymru, 2021), provides the strategic policy framework for transport-related activities in Wales. It sets out a long-term vision for transport over the next 20 years and outlines priorities for the next five years.

Strategic Framework

2.13 Llwybr Newydd establishes two tiers of transport plans:

- National Transport Delivery Plan (NTDP) (2022-2027): This plan outlines specific projects, schemes, initiatives, or interventions to be undertaken in the next five years. It identifies expenditure based on the Strategy's priorities, including ongoing projects. The NTDP supports the implementation of Future Wales – the National Plan 2040 and aligns with the Wales Infrastructure Investment Plan. It will be reviewed every five years and replaces the current National Transport Finance Plan (Llywodraeth Cymru, 2023).
- Regional Transport Plans: These statutory documents, developed by Corporate Joint Committees, aim to deliver the ambitions and priorities of Llwybr Newydd. Covering north, mid, southeast, and southwest Wales, these plans will replace the Local Transport Plans approved in 2015.

Integration of Land Use and Transport Planning

2.14 Land use and transport planning must be integrated to ensure cohesive development. The planning system should enable integration within and between different types of transport, land use planning, environmental policies, and policies for education, health, social inclusion, and wealth creation.

Development Plans

2.15 Development plans are the primary means to achieve integration between land use and transport planning. They must explain the authority's transport aims, how transport policies support other plan objectives, and how the development plan will support sustainable transport.

Integrated Planning and Transport Strategy

2.16 Planning authorities must set out an integrated planning and transport strategy in their development plans. This strategy should:

- Integrate and coordinate sustainable transport and land use planning
- Facilitate and promote accessibility for all
- Improve physical and digital connectivity
- Reduce the need to travel
- Reduce dependency on private vehicles
- Prioritize and support walking, cycling, and public transport
- Support the uptake of Ultra Low Emission Vehicles (ULEVs)
- Reduce transport-related airborne pollution
- Facilitate the provision of necessary transport infrastructure and sustainable transport improvements

Sustainable Transport

2.17 The Welsh Government is committed to reducing reliance on private cars and supporting a shift to walking, cycling, and public transport. This contributes to decarbonization, improves air quality, increases physical activity, and improves public health, aligning with the Well-being of Future Generations Act.

2.18 The planning system has a crucial role in reducing the need to travel and supporting sustainable transport by:

- Siting developments in locations easily accessible by sustainable travel modes
- Designing developments to integrate with existing land uses and neighbourhoods
- Facilitating short journeys by walking and cycling

2.19 Development proposals must maximize accessibility by walking, cycling, and public transport. This includes providing appropriate on-site infrastructure and, where necessary, mitigating transport impacts through off-site measures like developing active travel routes and bus priority infrastructure. Sustainable transport infrastructure and services should be prioritized and implemented before occupancy to establish sustainable travel patterns from the outset.

Sustainable Transport Hierarchy

2.20 Welsh Government policy mandates the use of a sustainable transport hierarchy in new developments, prioritizing walking, cycling, and public transport over private motor vehicles. This hierarchy aims to reduce travel needs, prevent car-dependent developments, and support schemes designed to facilitate active and sustainable transport.

2.21 The sustainable transport hierarchy should guide the preparation of development plans, site allocations, and planning application decisions. Careful consideration is needed to ensure new sites generating significant movement include provisions for walking, cycling, and public transport, and address any airborne pollution implications.

Active and Social Streets

2.22 Well-designed, people-oriented streets are fundamental to creating sustainable places. New developments should enhance place quality and create safe, social, attractive streets prioritizing pedestrians, cyclists, and public transport users. This includes integrating green infrastructure to filter pollutants, manage water, and provide urban cooling and habitats.

Public Transport and Ultra Low Emission Vehicles

2.23 Public transport accessibility is vital for sustainability, reducing dependency on cars for medium and long journeys. Development should be directed to locations with good public transport access, with site layouts and densities supporting public transport use.

2.24 To encourage ULEV adoption, the planning system should support the provision of ULEV charging points in new developments, integrating them into the overall design for maximum benefits. Charging points should be accessible, well-lit, and use renewable energy where possible.

Traffic Management and Car Parking

2.25 Traffic management aims to reduce traffic levels and speed in new developments, ensuring streets are designed for low speeds. Car parking provision should adopt a design-led approach, minimizing reliance on private cars and integrating parking into development designs without dominating the space.

2.26 Transport Assessments are crucial for understanding and mitigating development impacts on transport networks, promoting sustainable travel options, and minimizing air and noise pollution. They provide the basis for preparing Travel Plans, essential for managing transport impacts during and post-construction
.

3. Methodology

3.1 The Local Development Plan will significantly increase the population and employment opportunities within Monmouthshire County, which may result in more commuter and other journeys being undertaken within 200m of sensitive habitats. Therefore, Likely Significant Effects (LSEs) cannot be excluded, and the aforementioned European sites have been screened in for Appropriate Assessment regarding this impact pathway. This is in accordance with Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations (Natural England, 2018).

3.2 As such, the air quality modelling methodology and analyses presented in this report have been undertaken to inform the HRA for the River Wye, Wye Valley Woodlands, Cwm Cyldach Woodlands, Usk Bat Sites and Severn Estuary SACs, which contain habitats and species that are sensitive to air quality impacts.

3.3 The following sections outline the methodology used to model air quality in the identified SACs, affected by changes to traffic associated with the Monmouthshire RLDP 2033. The following sources of information and data have been used to form the basis of the air quality assessment:

- Department for Environment, Food and Rural Affairs' (Defra) Air Quality Background Concentration Maps based on a 2018 base year (Defra, 2020a);
- Defra's Vehicle Emission Factors (Defra, 2023);
- Driver Vehicle Licencing Agency (DVLA) statistics on licensed road-using cars and light goods vehicles dataset for 2022 (DVLA, 2022);
- Department for Transport's (DfT) Transport Decarbonisation Plan of future vehicle fleet projections (DfT, 2022);
- Emission rates as published in the Calculator for Road Emissions of Ammonia (CREAM) tool (Air Quality Consultants, 2020);
- 1x1 km modelled nitrogen and acid deposition data and ammonia background concentrations from the Air Pollution Information System (APIS, 2024);
- Traffic count and speed data provided by the AECOM Transport Consultant for 2024 and 2033.

3.4 The modelling assessment was conducted following methodology within Defra's Local Air Quality Management Technical Guidance (LAQM.TG(22) (Defra, 2022), and guidance contained within documents from Natural England (Natural England, 2018), the Institute of Air Quality Management (IAQM) (IAQM, 2020) and the Chartered Institute of Ecology and Environmental Management (CIEEM) (CIEEM, 2021).

Traffic Data

3.5 Traffic data were provided for the M48 Severn Bridge crossing near the Severn Estuary and River Wye SACs (covering transects E01a/b and E02a/b), for A466 near the Wye Valley Woodlands and River Wye SACs, for A40 near the River Wye SAC, and for the A465 near the Cwm Clydach Woodlands and Usk Bat Sites SAC (covering transects E06 and E07a/b). These roads are expected to experience changes in traffic flows over the Local Plan period to 2033. As such, an air quality effect due to emissions from additional traffic growth on these roads may occur. The modelled road links are shown in Figure 1 to Figure 6.

3.6 Traffic data were provided in the form of 24-hour Annual Average Daily Traffic (AADT) flows, with percentage heavy duty vehicle (HDV) flows and average speed for three scenarios – 2024 baseline (also used for the future baseline), future year 2033 'Do Minimum', and future year 2033 'Do Something' Scenario representing implementation of the Local Plan. A summary of the traffic data used in the air quality assessment is given in Annex A.1.

Modelled Vehicle Fleet

3.7 Version 12.0.1 of the Emissions Factor Toolkit (EFT) (Defra, 2023) includes a basic vehicle fleet mix for roads in England (excluding London) up to 2050. The basic vehicle fleet splits are based on data provided by DfT / Highways England (now National Highways). The composition of Euro emission standards and distribution of vehicle sizes/weights remain constant from 2030 until 2050. The intended use of the extended dataset to 2050 is in support of climate assessments and appraisals only. However, Defra advises that "Where emissions are to be used after 2030 to inform air quality assessments, the appropriate caveats around the limitations of the analysis must be included to accompany the assessment".

3.8 For the baseline modelling of the SACs, the nominal EFT v12.0.1 "Basic Split" rural fleet for the 2024 year was used, as this aligns well with the 2024 base year traffic data and suitable meteorological data within the last 5 years of the baseline year, 2024, was used.

3.9 For the future year (2033) modelling, an approach has been taken to determine the vehicle fleet used in the modelling to apply a more up-to-date projection than that published in the EFT v12.0.1 in relation to the uptake of hybrid and zero emission / battery electric vehicles. A current vehicle fleet representative of the local area was determined, which was then projected forward to the future year (2033) following the methodology below.

3.10 The current (2022) fleet composition, from which the 2033 fleet projection is based, is derived from the most up-to-date available full-year dataset (2022) of registered light-duty vehicles (LDV) from DVLA (DVLA, 2022). A high-level review of the fleet characteristics was conducted for Monmouthshire County Council and neighbouring counties. Based on the relative similarities in vehicle type breakdown, it was decided to use the county-level fleet for Monmouthshire to represent the modelled fleet.

3.11 Light Duty Vehicles (LDVs), which are mainly cars and light goods vehicles (LGVs), comprise the majority of vehicles in the overall fleet (between approximately 91% and 97%), and therefore this dataset will give a robust and accurate starting point for future fleet projections. Heavy Duty Vehicles (HDVs) made up of buses, coaches and HGVs), which comprise the remaining ~3-9% of the fleet, have been apportioned based on the EFT basic split for 2033. The exact LDV/HDV split varies according to the provided traffic data and depends on the road link, and the fleet breakdown for each road link takes this split into account.

3.12 Transport projections out to 2050 of UK's intended decarbonisation of the fleet and alignment with Net Zero are available from the DfT's Transport Decarbonisation Plan (TDP) (DfT, 2022). These projections are based on high and low ambition for rates of decarbonisation for every year up to 2050. These projections were adjusted to determine the breakdown of individual fuel types in line with the EFT v12.0.1.

3.13 To take a more cautious approach, the lower ambition "Decarbonising Transport Upper" projection was used to project the 2022-based current fleet out to the future year of 2033, by using the calculated year-on-year car, LGV and HDV growth rates for each vehicle fuel type. This projection was deemed to represent a more cautiously realistic scenario than either the EFT v12.0.1 or TDP baseline projections.

Pollutants of Interest

3.14 The pollutants of interest with regard to sensitive ecosystems for which critical levels and critical loads exist, and which are included in the air quality modelling and assessment of impacts on the five SACs listed above, are NO_X, NH_3, and nitrogen and acid deposition. Modelling of these pollutants is undertaken to assess the air quality impacts of planned development in the Local Plan on the SACs alone, and 'in combination' with existing plans within surrounding authorities.

3.15 Whilst emissions of NO_X from road vehicles are regulated according to Euro standards, emissions of NH_3 are not. This means that emissions of NH_3 from individual vehicle types are highly uncertain, particularly as measurements are rarely made (as this is not required for regulatory purposes). The uncertainty associated with the predicted nitrogen deposition rates from NH_3 is also greater than for NO_2, with the NH_3 derived nitrogen deposition rates representing an upper estimate.

3.16 There is currently no tool publicly available for the assessment of road traffic emissions of NH_3 from National Highways, Defra, Natural England, or other nature conservation bodies. However, there is

evidence that exclusion of NH_3 from assessments leads to an underestimate of deposited nitrogen (Air Quality Consultants, 2020).

3.17 The methodology used to model NH_3 concentrations from road traffic, using ADMS Roads, and the subsequent contribution to nitrogen deposition within the SACs (described below), is considered the most appropriate that is available at this time. The methodology has been applied by AECOM in several Appropriate Assessments to inform HRA including those for Selby District, Horsham District, Test Valley Borough and Epping Forest District Councils.

Nitrogen Oxides

3.18 Defra's EFT contains NOx emissions rates for local authorities to use for Local Air Quality Management (LAQM) assessments. The EFT is also used for other purposes including Environmental Impact Assessments (EIAs) and HRAs.

3.19 The EFT was used to calculate vehicle emissions in 2024 and 2033 assessment years using the fleet data which was calculated using the approach set out in paragraph 3.7 to 3.13.

3.20 Detailed dispersion modelling of road traffic emissions of NOx has been undertaken using the latest version of ADMS Roads (currently v5), EFT v12.0.1 emission rates, and custom vehicle fleet projections from the DfT for the future year 2033 scenarios. The subsequent contribution of emitted NOx to nitrogen deposition within the SAC has also been assessed.

Ammonia

3.21 In February 2020, Air Quality Consultants developed and published the Calculator for Road Emissions of Ammonia (CREAM) tool, '***in order to allow tentative predictions regarding trends in traffic-related ammonia emissions over time***'. The tool is based upon remotely sensed pollutant measurements, published real-world fuel consumption data, and ambient measurements of ammonia recorded in Ashdown Forest (2014-2016).

3.22 The report that was published alongside the CREAM tool states that:

"***It should be recognised that these emissions factors remain uncertain. Using them to make future year predictions will clearly be an improvement on any assessment which omits ammonia. They are also considered to be more robust than the emissions factors contained in the EEA Guidebook, which risk significantly under-predicting ammonia emissions. The emissions factors contained in the CREAM model can be considered to provide the most robust estimate of traffic-related ammonia possible at the present time, but they may be updated in the future as more information becomes available***."

3.23 The CREAM tool currently uses vehicle fleet information from Defra's EFT v9 which has now been superseded. AECOM has therefore applied the ammonia emission factors, as derived by Air Quality Consultants and in the current version of CREAM, with the vehicle fleet on rural roads from EFT v12.0.1, following the same vehicle fleet methodology as listed above, to estimate emissions in the SACs.

3.24 The latest version of ADMS Roads has been employed to model the dispersion of emissions of NH_3 from road traffic, consistent with the approach for modelling emissions of NO_X.

Figure 1: Modelled Road Network and Ecological Receptor Transects (Eco Transects E01a/b and E02a/b).

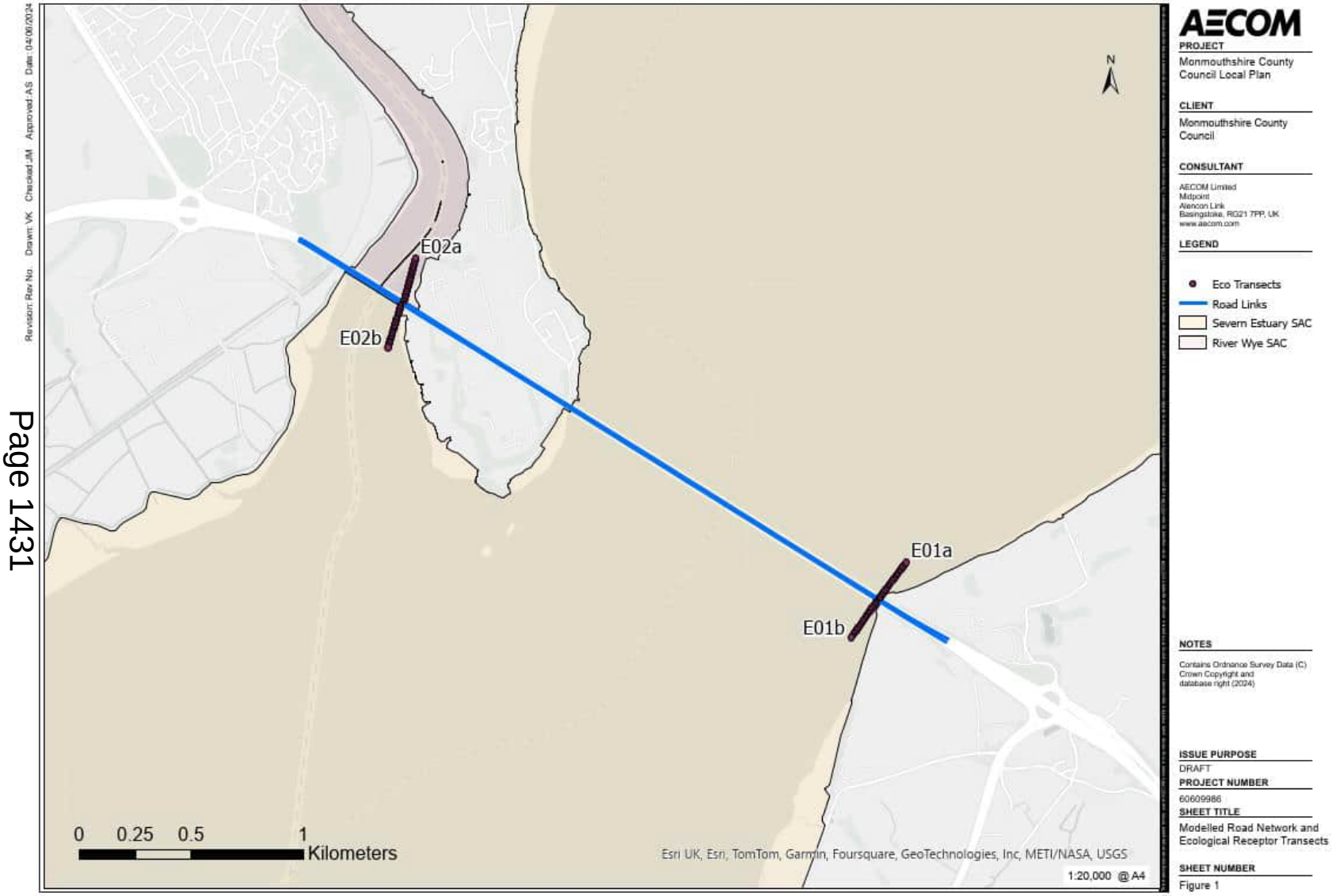


Figure 2: Modelled Road Network and Ecological Receptor Transects (Eco Transect E03)

Figure 3: Modelled Road Network and Ecological Receptor Transects (Eco Transect E04)

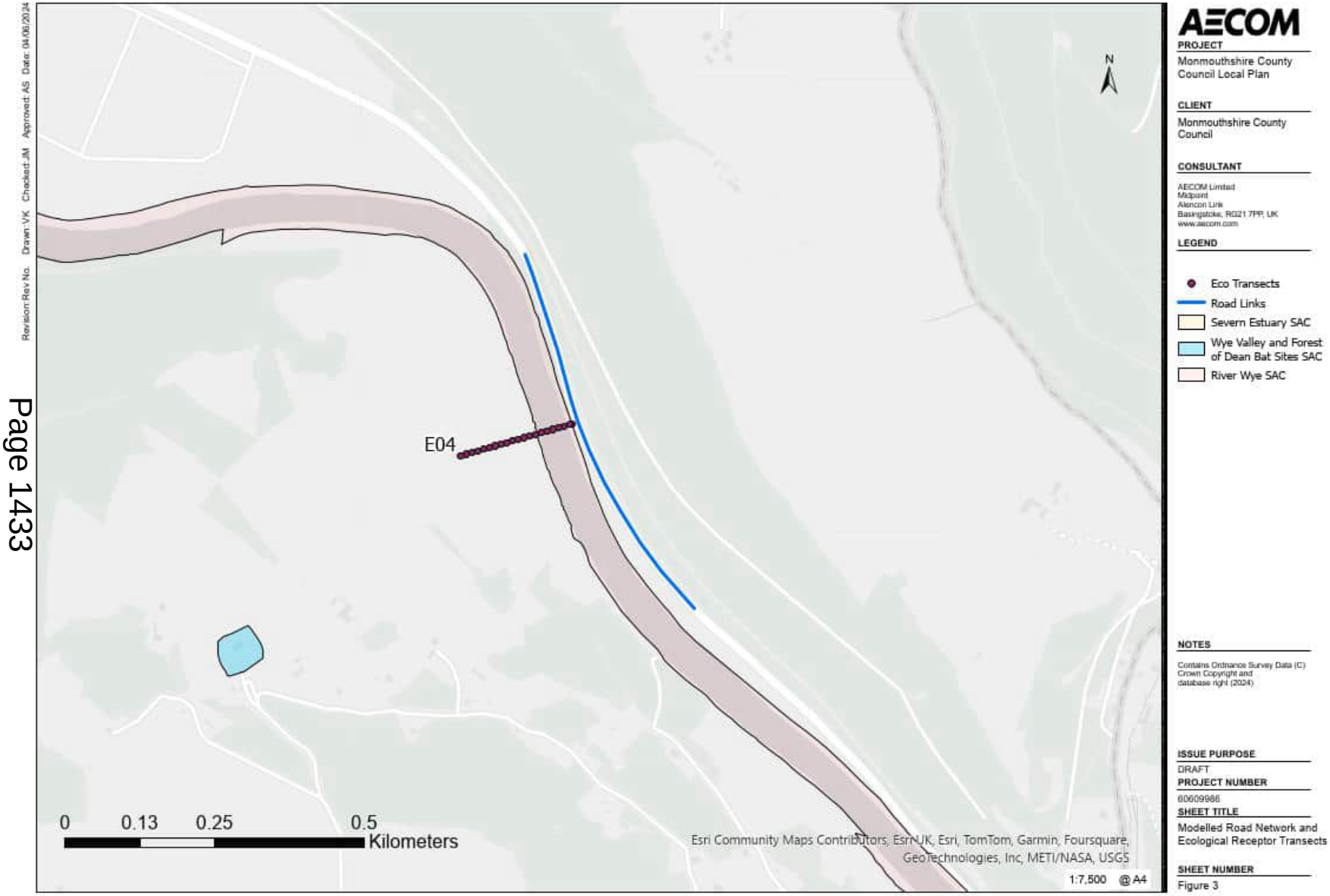


Figure 4: Modelled Road Network and Ecological Receptor Transects (Eco Transect E05)

Figure 5: Modelled Road Network and Ecological Receptor Transects (Eco Transect E06)

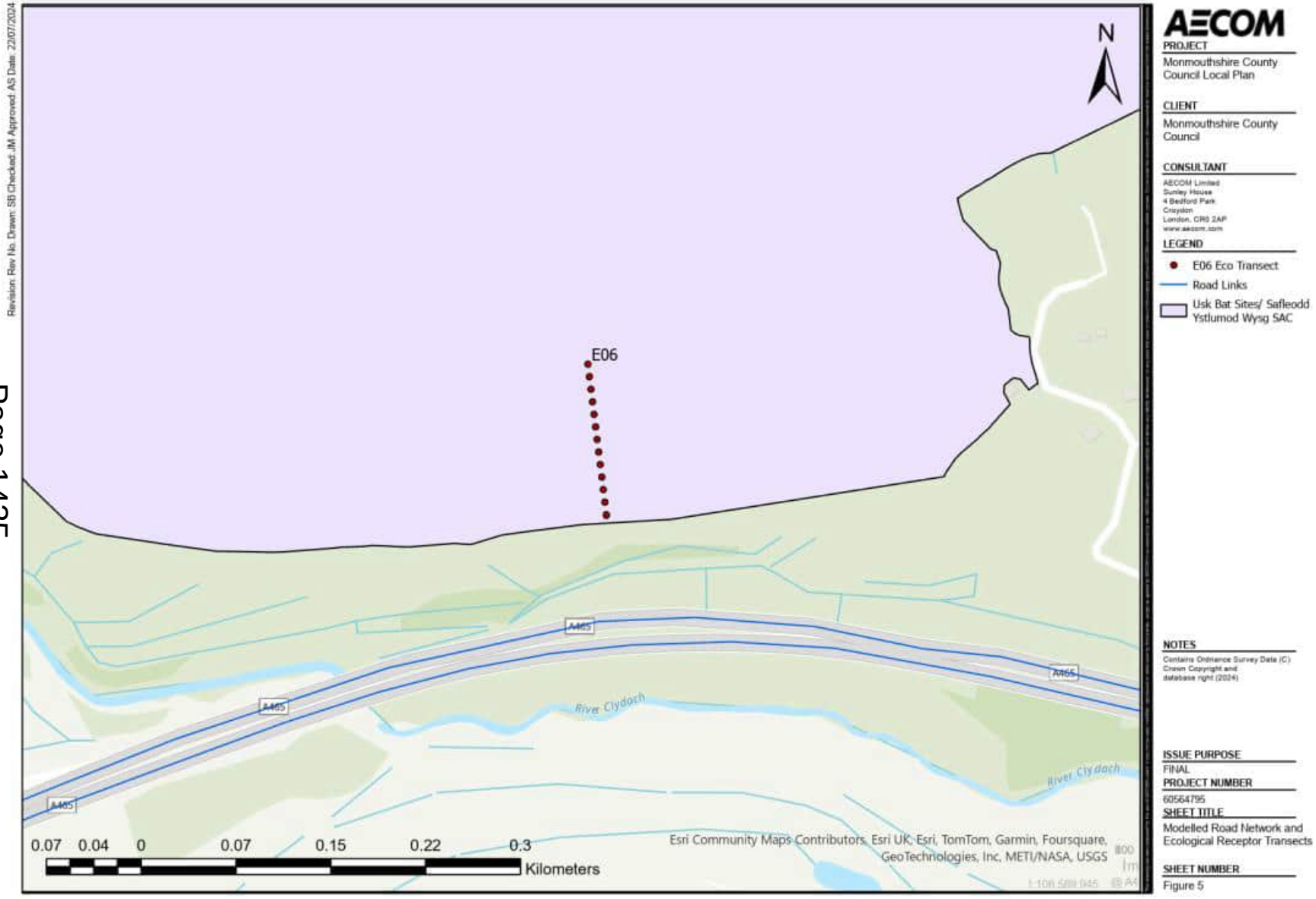
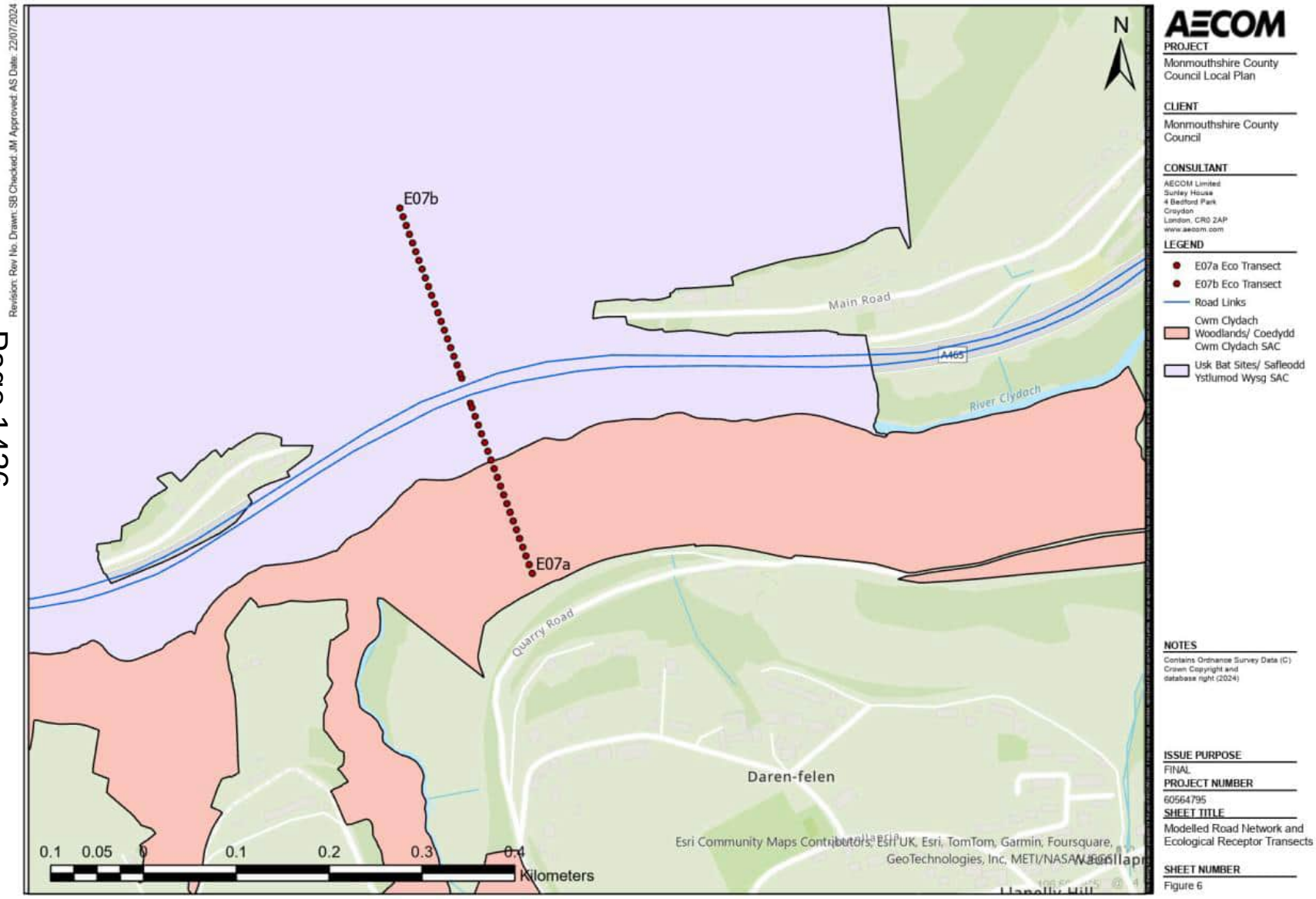


Figure 6: Modelled Road Network and Ecological Receptor Transects (Eco Transect E07a/b)



Receptors

3.25 Pollutant concentrations and deposition rates have been predicted along defined transects through the SACs within 200m of affected roads, in accordance with National Highways guidance for ecological assessments (LA105) (DMRB, 2019) and Natural England guidance (Natural England, 2018). The greatest impacts from changes in road traffic emissions will be observed and modelled closest to the roadside. Consideration of the road network within 200m of the SAC is therefore considered robust as background concentrations utilised in the assessment will account for all other sources that are not defined explicitly in the model.

3.26 The locations of the ecological transects relevant to this project were agreed with MCC and other stakeholders. The transects are situated at key locations where the greatest impacts upon each of the five SACs assessed are likely to occur. The locations are presented in Figure 1 to Figure 6 and further details are presented in Annex A.2.

3.27 For each SAC, the receptors are situated at the closest point to the road within the SAC, and spaced every 10m within the transect, up to 200m from the roadside. All receptors are modelled at ground level (0m height).

3.28 The greatest impacts will generally occur where both the greatest change in traffic flows is expected and the most sensitive SAC habitat lies closest to the road. This information has been used to select the transect locations. The usual approach is to place a transect on a modelled link (sometimes having a transect either side of the road to account for differences in the dispersion of emissions due to meteorology), with each link being defined as a stretch of road with changes in emissions i.e. where there are changes in traffic flows and/or speeds.

3.29 The modelled transects presented in Figure 1 to Figure 6 provide good coverage of the SACs.

Model Setup

3.30 As detailed above, road traffic emissions of NO_X were derived using Defra's EFT v12.0.1 and associated guidance and tools (Defra, 2023). For the base year (2024), the nominal EFT "Basic Split" rural vehicle fleet for 2024 was used, whereas for all the future year (2033) scenarios, the 2033 projected vehicle fleet, as described in the methodology above, was used with the default EFT emission factors for the latest year available (2030). Road traffic emissions of NH_3 were derived using emission rates taken from CREAM V1A (Air Quality Consultants, 2020) combined with the EFT v12.0.1 vehicle fleet for the relevant year, using the same vehicle fleet methodology as described above for NO_X.

3.31 Detailed dispersion modelling was undertaken using the current version of ADMS-Roads (v5.0) to model concentrations of NO_X and NH_3 using the parameters in Table 2 for the following scenarios:

- 2024 Baseline – 2024 AADT, 2024 emission factors and 2024 "Basic Split" fleet, and 2024 background concentrations;
- 2033 Future Baseline – 2024 AADT, 2030 emission factors (latest available year), 2033 projected vehicle fleet (ANPR-adjusted), and 2030 background concentrations (the latest projected year available from Defra);
- 2033 Do Minimum – 2033 AADT without Local Plan but with all committed development, 2030 emission factors, 2033 projected vehicle fleet, and 2030 background concentrations; and
- 2033 Do Something – 2039 AADT with Local Plan and all committed development using 2030 emission factors, 2033 projected vehicle fleet, and 2030 background concentrations.

3.32 A baseline year was modelled, using 2024 traffic data although it was not possible to undertake a model verification exercise due to a lack of suitable monitoring in the model domain, and as such, standard verification factors based on previous project experience and professional judgment were applied. To support the assessment of the potential impact of the planned development in the Local Plan scenarios, a 'future baseline' and future year 'do minimum'

scenario were modelled. The 'do minimum' scenario includes the influence of development in neighbouring local authorities, whereas the 'future baseline' does not.

3.33 The future baseline is a hypothetical scenario as it applies improvements in vehicle emissions standards to the baseline vehicle fleet without allowing for any traffic growth. However, such an approach enables the 'in combination' effect of development and traffic growth to be seen unobscured by improvements in emissions technology / performance.

3.34 The difference between the 'do something' and the 'do minimum' scenarios provide the impact of the planned development within the Local Development Plan, alone. The difference between the 'do something' and the 'future baseline' scenarios provides a thorough and precautionary assessment of the impact of the planned development within the Local Plan 'in combination', as the 'future baseline' accounts for no future growth.

Table 2: General ADMS-Roads Model Conditions

Variables	ADMS-Roads Model Input
Surface roughness at source	0.5m
Surface roughness at Meteorological Site	0.2m
Minimum Monin-Obukhov length for stable conditions	30m
Terrain types	Complex terrain (E03, E04, E05, E06, E07a/b) Flat (E01a/b, E02a/b)
Receptor location	x, y coordinates determined by GIS, z = 0m for ecological receptors.
Emissions	NO_X – Defra's EFT v12.0.1 NH_3 – CREAM V1A
Meteorological data	hourly sequential data from a numerical weather prediction (NWP) reanalysis dataset, centred on the following locations (lat/lon): 51.61°N, 2.70°W (E01a/b, E02a/b) (2023) 51.74°N, 2.63°W (E03, E04, E05) (2023) 51.77°N, 3.38°W (E06, E07a/b) (2022)
Receptors	Ecological transects
Model output	Long-term (annual) mean NO_X and NH_3 concentrations.

Complex Terrain

3.35 Due to the influence of steep-sided valley topography on meteorological conditions, air flow and pollutant dispersion conditions around transects E03, E04, E05, E06 and E07a/b, the complex terrain module in ADMS-Roads was activated for modelling these transects. Terrain data for the study area from the Shuttle Radar Topography Mission (SRTM) was downloaded from the CGIAR Consortium for Spatial Information (CSI) website[4], via the ADMS-Roads "download terrain data" link. The SRTM terrain data is 30m spatial resolution at the equator, or approx. 50m at UK latitude, and was processed into an ADMS-Roads terrain file (.ter) covering the area encompassing the E03, E04, E05, E06 and E07a/b transects using a GIS application. Transects E01a/b and E02a/b were not affected by steep or complex terrain and were therefore modelled without the use of a complex terrain file.

Plume Depletion

3.36 Plume depletion due to dry deposition onto vegetation was considered in the model, which was enabled by using the ADMS-Roads 'Dry Deposition' module. The short vegetation or 'grassland' deposition rates presented in the Air Quality Technical Advisory Group (AQTAG) deposition velocities that are cited in 2020 IAQM guidance (IAQM, 2020), as shown in Table 3, were applied to transects E01a/b and E02a/b. The 'forest' deposition rates were applied to transects E03, E04,

[4] CGIAR Consortium for Spatial Information (CSI). Available at https://srtm.csi.cgiar.org/srtmdata/

E05, E06 and E07a/b as along most of the transect length there was long vegetation in the form of forests.

3.37 The deposition velocity for NO_2 was applied to raw modelled NO_X. This assumes that 100% of NO_X is emitted as NO_2, and therefore represents an optimistic depletion of NO_X from the atmosphere.

Table 3: Nitrogen Deposition Velocities and Conversion Rates

Pollutant	Habitat	Nitrogen deposition conversion rates	Deposition velocity
NO_2	Grassland	1 µg/m^3 NO_2 = 0.14 kgN/ha/yr	0.0015 m/s
NO_2	Forest	1 µg/m^3 NO_2 = 0.29 kgN/ha/yr	0.003 m/s
NH_3	Grassland	1 µg/m^3 NH_3 = 5.2 kgN/ha/yr	0.020 m/s
NH_3	Forest	1 µg/m^3 NH_3 = 7.8 kgN/ha/yr	0.030 m/s

Meteorological Data

3.38 Three sets of hourly sequential numerical weather prediction (NWP) reanalysis data at locations 51.61°N, 2.70°W, 51.74°N, 2.63°W, 51.77°N, 3.38°W have been used in this modelling assessment. Meteorological data within the last 5 years of the baseline year, were used as they were deemed most suitable for comparison with baseline traffic data and emission factors. The former location being used to model transects E01a/b and E02a/b, the second location to model transects E03, E04 and E05, and the third to model transects E06 and E07a/b. The first station is located approximately 4km south-west of the River Wye and Severn Estuary SACs, the second station is located approximately 10km south of the Wye Valley Woodlands SAC, and the third station is located approximately 16km south-west, Cwm Clydach Woodlands and Usk Bat Sites SACs. All sites experience meteorological conditions that are representative of those within the air quality study area.

3.39 Figure 7, Figure 8 and Figure 9 show that the dominant direction of wind was from the west/south-west, as is typical for the UK.

Figure 7: Wind Rose, Meteorological Data at location 51.61°N, 2.70°W (Transects E01a/E01b and E02a/E02b) C:\Working\Monmouthshire\5161N_0270W_23.met

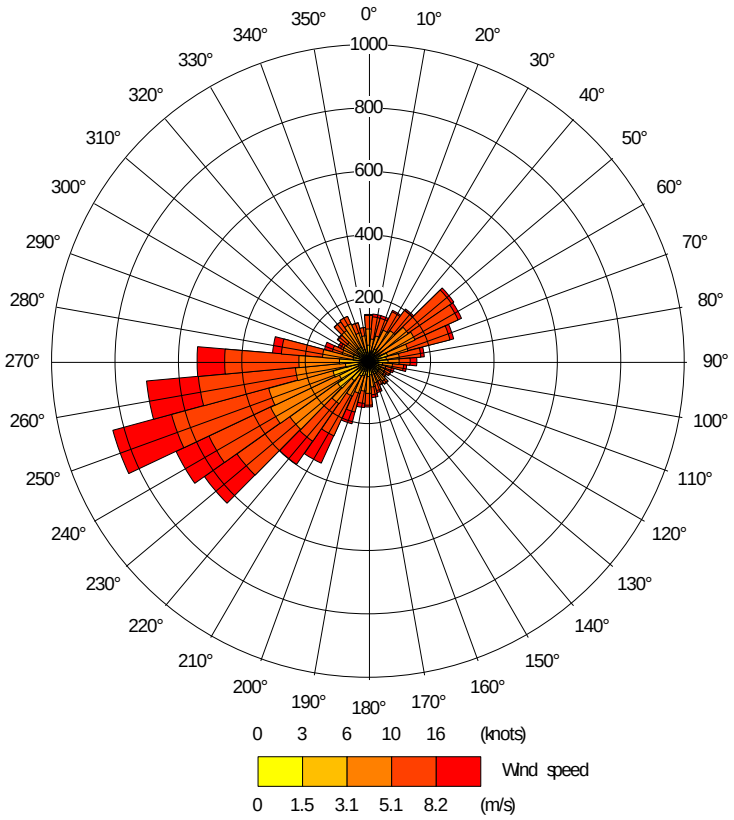


Figure 8: Wind Rose, Meteorological Data at location 51.74°N, 2.63°W (Transects E03, E04 and E05)

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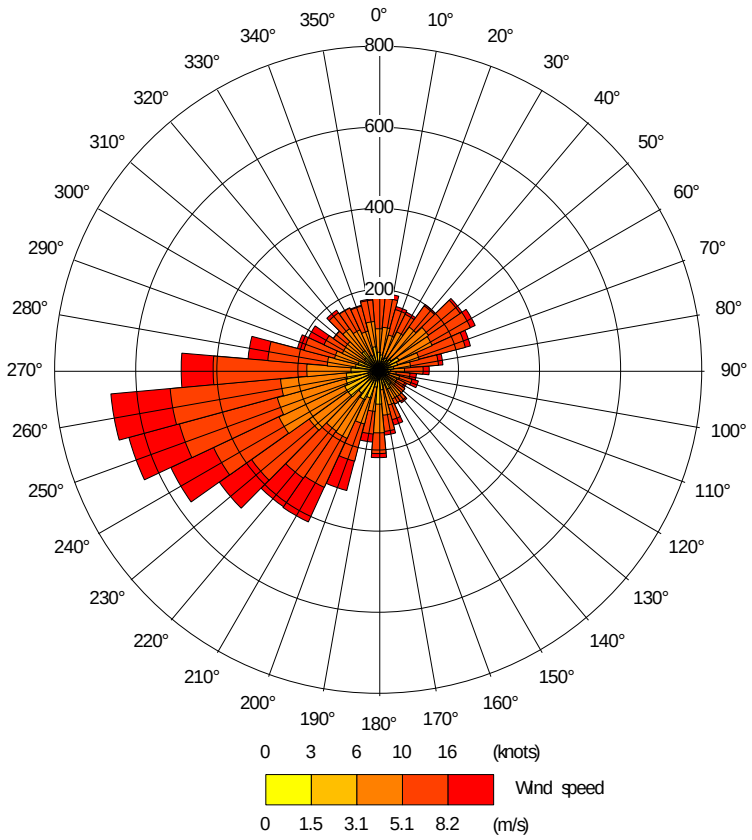
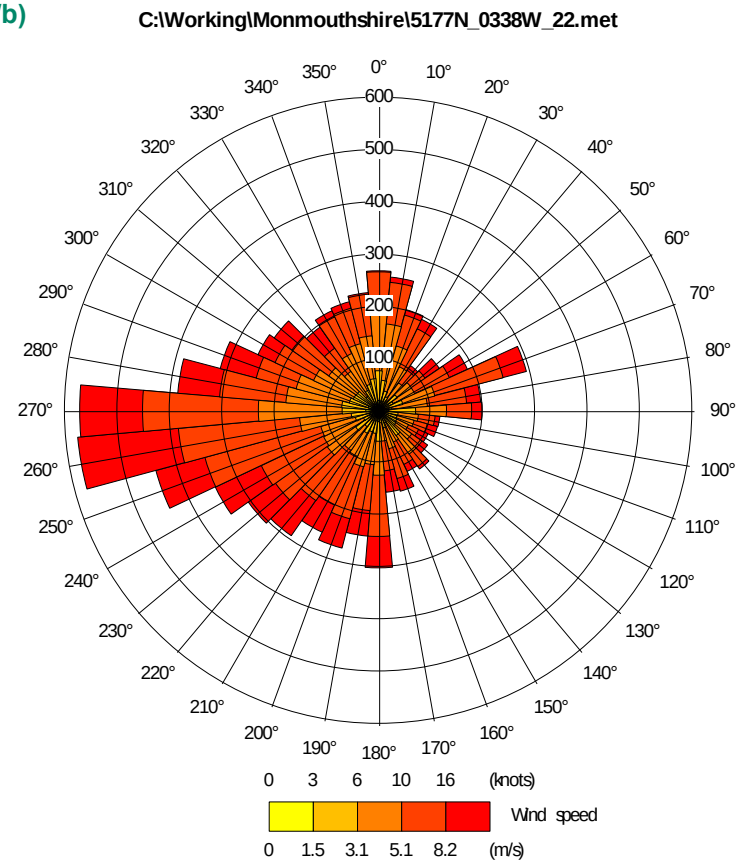


Figure 9: Wind Rose, Meteorological Data at location 51.77°N, 3.38°W (Transects E06 and E07a/b)



Background Data

3.40 Background concentrations of nitrogen dioxide (NO_2) and NO_X for 2024 and 2030 were sourced from Defra's 2018-based 1x1km background maps in the study area (Defra, 2020a). 2030 is the latest year for which background maps are published and, as concentrations of NO_2 and NO_X are predicted to reduce further in the future, is considered to be a worst-case representation of conditions in 2033.

3.41 It was decided to not remove explicitly modelled source sectors from the NO_2 and NO_X background concentrations, in order to give a worst-case assessment. The data presented in Table 4 show that the concentrations are predicted to decrease between 2024 and 2030.

3.42 The NH_3 background concentrations from APIS are presented in Table 5 on page 25.

Table 4: Defra Mapped Background Pollutant Concentrations

Transects	Road Name	Grid Square (X, Y)	Annual Mean Concentrations (µg/m³)			
			2024 NO_2	2024 NO_x	2030 NO_2	2030 NO_x
E01a	M48	356500, 189500	6.40	8.11	5.44	6.84
E01b	M48	356500, 189500	6.40	8.11	5.44	6.84
E02a	M48	354500, 191500	6.20	7.84	5.26	6.61
E02b	M48	354500, 191500	6.20	7.84	5.26	6.61
E03	A466	353500, 208500	3.76	4.67	3.37	4.17
E04	A466	352500, 211500	4.08	5.07	3.59	4.45
E05	A40	352500, 213500	5.23	6.55	4.35	5.42
E06	A465	318500, 213500	4.44	5.54	3.93	4.89
E07a	A465	321500, 212500	5.04	6.31	4.27	5.31
E07b	A465	321500, 212500	5.04	6.31	4.27	5.31

Note: Modelled source sectors have not been removed from the total background.

Ecological Data

3.43 APIS provides 'a searchable database and information on pollutants and their impacts on habitats and species'. Data for the appropriate habitats, both forest and grasslands, have been applied for each receptor along the transects. This includes critical loads of nitrogen and the average nitrogen and acid deposition rates to the habitat, as presented in Table 5.

3.44 Background concentrations of ammonia were also sourced from 5x5 km modelled maps available from APIS, whereas background concentrations of NO_X and NO_2 were sourced from Defra's latest 1x1 km maps, thereby accounting for all sources that are not explicitly defined in the model.

3.45 In order to create a robust and scientifically agreed projection for background nitrogen deposition trends in the UK, even allowing for growth, the Joint Nature Conservation Committee (JNCC) commissioned the Nitrogen Futures project, which reported in 2020 (JNCC, 2020). The JNCC Nitrogen Futures project investigated whether a net improvement in nitrogen deposition (including expected development over the same period) was expected to occur to 2030 under a alrange of scenarios ranging from the most cautious scenario (Business As Usual, BAU, reflecting simply existing emission reduction commitments /measures already in place) to much more ambitious scenarios that would require varying amounts of additional, currently uncommitted, measures from the UK government and devolved administrations.

3.46 The report concluded that ***'The scenario modelling predicts a substantial decrease in risk of impacts on sensitive vegetation by 2030, under the most likely future baseline [a scenario called '2030 NAPCP+DA (NECR NO_x)']. This is estimated to achieve the UK Government's Clean Air Strategy (CAS) target for England, defined as a 17% decrease in total reactive N deposition onto protected priority sensitive habitats, with a predicted 18.9% decrease [for England] from a 2016 base year'***. The report predicted a fall in nitrogen deposition by 2030 under every modelled scenario, including the most cautious (2030 BAU). For the BAU scenario nitrogen deposition was forecast to decrease between 2017 and 2030 from 277.1 kt N to 239.5 kt N (i.e. a reduction of 37.6 kt N).

3.47 Background nitrogen deposition at Ashdown Forest was specifically discussed in Annex 5 of the report as a case study. The report predicted a 1-2 kgN/ha/yr reduction in background nitrogen deposition to low growing vegetation (i.e. the heathland interest feature) at the SAC between 2016 and 2030, depending on scenario, and noted that ***'The emission reductions predicted between the 2017 and 2030 baseline scenarios cover a range of sectors, including road transport, and so improvements are predicted to occur over the whole site, including the worst-affected roadside locations'***. This was the case under all modelled scenarios.

3.48 In summary, the Nitrogen Futures study forecast a minimum rate of improvement in background nitrogen of 0.07 kgN/ha/yr at Ashdown Forest, with other forecasts indicating a greater rate of reduction. In line with the forecast for Ashdown Forest, and therefore taking a precautionary approach, this study applies a projected decrease in background nitrogen of 0.07 kgN/ha/yr. The corresponding decrease is also reflected in the total average acid deposition rate for nitrogen in the future scenarios (reduction of 0.065 keq/ha/yr N.).

3.49 Over the 9-year period, this equates to a reduction in the APIS background nitrogen deposition rate presented in Table 5 (3-year average, 2019-21/ 2020-2022) of 0.63 kg N/ha/yr for the 2033 model scenarios. This decrease is also reflected in the total average acid deposition rate for nitrogen in the 2033 scenarios (reduction of 0.045 keq/ha/yr N).

3.50 No other changes to the APIS data have been made from those presented (3-year average, 2019-21/ 2020-2022) for any modelled scenario.

3.51 Not to make ***any*** allowance for improvements in emission factors or background concentrations would result in increased emissions and hence concentrations over the plan period as an increased number of vehicles is expected on the roads. This is not expected to occur as can be seen from previous long-term trends in the UK, which show slowing of improvements over extended periods, not worsening. Historical records (e.g., Defra monitoring trends) show that as

increased vehicles enter the fleet that these increases are offset by the improvements in the emissions of the newer vehicles and the removal of older vehicles.

3.52 In 2018 the Court of Justice of the European Union (CJEU) ruled in cases C-293/17 and C-294/17 (often dubbed the Dutch Nitrogen cases). One aspect of that ruling concerned the extent to which autonomous measures (i.e., improvements in baseline nitrogen deposition that are not attributable to the Local Plan) can be taken into account in appropriate assessment, the CJEU ruled that it ***was*** legally compliant to take such autonomous measures into account provided the benefits were not 'uncertain' (paragraphs 130&132). Note that previous case law on the interpretation of the Habitats Directive has clarified that 'certain' does not mean absolute certainty but '***where no reasonable scientific doubt remains***'[5] [emphasis added].

3.53 The forecasts for improvements in NO_X emission factors, background concentrations and background deposition rates used in this report are considered to be realistic and have the requisite level of certainty. This is because a) data are used and to a large extent they build upon established historic trends in NO_X and oxidised nitrogen deposition and b) for total nitrogen deposition they are based on a cautious use of evidenced central government forecasts associated with uptake of technology that has either already been introduced or is widely expected within the professional community to be introduced and effective before 2030, as illustrated in the Nitrogen Futures project:

- When it comes to forecasting the NO_X emissions of additional traffic, it would overestimate those emissions to assume that by 2033 the emission factors will be no different to those in 2024; to make such an assumption would be to fail to take account of the expected continued uptake of Euro 6 compliant vehicles between 2024 and 2033 and would assume (putting it simply) that no motorists would replace their cars during the entire plan period. For example, the latest (Euro 6/VI) emissions standard only became mandatory in 2014 (for heavy duty vehicles) and 2015 (for cars) and the effects will not therefore be visible in the data available from APIS because relatively few people will have been driving vehicles compliant with that standard as early as 2019. Far more drivers can be expected to be using Euro 6 compliant vehicles by the end of the Local Plan period.
- The vehicle emission factors within the air quality modelling tools available only project out to 2030. While the fuel technology is projected out to 2033 following the DfT decarbonisation pathway, as described earlier, the breakdown of euro classifications published in the EFT extends to 2030, and so the 2033 assessment year does not recognise the further three years of continued uptake of more stringent emissions standards. Therefore, the results are likely to be slightly more cautious in terms of emissions related to vehicle age.

[5] Case C-239/04 Commission v Portugal [2006] ECR 10183, para. 24; Holohan et al vs. An Bord Pleanála (C-461/17), para. 33

Table 5: APIS Data for Ecological Transects

Transect	Av. N Dep kgN/ha/yr[$]	Critical Load N Dep kgN/ha/yr	Total Av. Acid Dep keq/ha/yr N[$]	Critical Load N Acid Dep keq/ha/yr MinCLMaxN	Background NH_3 (µg/m^3)*
E01a	13.89	10 - 20	1.04	No critical load available	1.61
E01b	13.89	10 - 20	1.04	No critical load available	1.61
E02a	14.14	10 - 15	1.06	0.851	1.593
E02b	14.14	10 - 20	1.06	No critical load available	1.593
E03	28.39	10 - 15	2.11	1.226	1.46
E04	28.18	10 - 15	2.10	0.851	1.61
E05	28.48	10 - 15	2.12	1.226	1.68
E06	25.88	5 - 15	2.04	0.709	0.906
E07a	26.42	10 - 15	2.06	1.645	0.935
E07b	26.42	5-15	2.06	0.709	0.935

Notes: Critical Load data for N and acid deposition were not available for Severn Estuary SAC (E01a/b and E02b transects). Transects E06, E07a and E07b used APIS data from 2020-2022 and transects E01a, E01b, E02a, E02b, E03, E04 and E05 use APIS data for 2019-2021.
[$] Average nitrogen deposition rate (kgN/ha/yr) projected to decrease by 0.63 kgN/ha/yr from base year to future year (i.e. 0.07 x 9 years = 0.63 kgN/ha/yr). This results in a corresponding decrease in acid deposition of 0.045 keq/ha/yr N.
* Average 2024 NH_3 background concentration applied in modelling assessment. No future projections used for background Ammonia

Verification

3.54 Model verification is the process by which the performance of the model is assessed to identify any discrepancies between modelled and measured concentrations at air quality monitoring sites within the study area.

3.55 There are no appropriately located local air quality monitoring stations within the model domain with which to make a comparison between modelled and measured concentrations. Therefore, verification factors have been used based upon professional judgement and experience of similar projects. Verification factors of 1.5 for NO_X and 1.0 for NH_3 have thus been applied to the modelled concentrations, based upon professional judgement and previous project experience to verify and validate the EFT and CREAM tools.

Deposition velocities

3.56 Deposited nitrogen from road traffic derived NH_3 and NO_2 was estimated using the relevant deposition velocities for grassland/short vegetation or forest habitat, presented in Table 3. The conversion rates were applied to the final modelled NO_2 and NH_3 concentrations from road traffic, to provide kgN/ha/year.

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5. Annexes

A.1 Traffic Data

Link	SAC	Transect	2024 Base AADT	2024 Base HDV (%)	2033 DM AADT	2033 DM HDV (%)	203 DS AADT	2033 DS HDV (%)	All Scenarios Speed (kph)
M48	Severn Estuary	E01a	14,259	10.5	15,460	10.5	17,216	10.5	112.6
M48	Severn Estuary	E01b	12,601	9.5	13,663	9.5	15,590	9.5	112.6
M48	River Wye/ Afon Gwy	E02a	14,510	8.4	15,732	8.4	16,454	8.4	63.4
M48	Severn Estuary	E02b	14,172	6.1	15,366	6.1	16,099	6.1	65.1
A466	Wye Valley Woodlands/ Coetiroedd Dyffryn Gwy	E03	2,153	9.2	2,334	9.2	2,845	9.2	55.7
A466_Redbrook Road	River Wye/ Afon Gwy	E04	3,524	8.2	3,821	8.2	4,333	8.2	58.7
A40	River Wye/ Afon Gwy	E05	14,259	10.5	15,460	10.5	17,216	10.5	112.6
A465	Usk Bat Sites	E06	19,910	7.9	21,663	7.9	22,503	7.9	52.2
A465	Cwm Clydach Woodlands	E07a	9,985	9.1	10,864	9.1	11,264	9.1	51.0
A465	Usk Bat Sites	E07b	9,925	6.7	10,800	6.7	11,239	6.7	53.3

A.2 Modelled Ecological Receptor Locations

Transect Point	X co-ordinate (m)	Y co-ordinate (m)
E01a_3.5m	356589.5	189814.4
E01a_10m	356593.4	189819.6
E01a_20m	356599.4	189827.6
E01a_30m	356605.5	189835.6
E01a_40m	356611.5	189843.5
E01a_50m	356617.5	189851.5
E01a_60m	356623.5	189859.5
E01a_70m	356629.5	189867.5
E01a_80m	356635.5	189875.5
E01a_90m	356641.6	189883.5
E01a_100m	356647.6	189891.5
E01a_110m	356653.6	189899.5
E01a_120m	356659.6	189907.4
E01a_130m	356665.6	189915.4
E01a_140m	356671.7	189923.4
E01a_150m	356677.7	189931.4
E01a_160m	356683.7	189939.4
E01a_170m	356689.7	189947.4
E01a_180m	356695.7	189955.4
E01a_190m	356701.7	189963.3
E01a_200m	356707.8	189971.3
E01b_6.5m	356573.3	189793.7
E01b_10m	356571.2	189790.8
E01b_20m	356565.5	189782.7
E01b_30m	356559.8	189774.5
E01b_40m	356554.0	189766.3
E01b_50m	356548.3	189758.1
E01b_60m	356542.6	189749.9
E01b_70m	356536.8	189741.7
E01b_80m	356531.1	189733.5
E01b_90m	356525.4	189725.3
E01b_100m	356519.6	189717.1
E01b_110m	356513.9	189708.9
E01b_120m	356508.2	189700.7
E01b_130m	356502.4	189692.6
E01b_140m	356496.7	189684.4
E01b_150m	356490.9	189676.2
E01b_160m	356485.2	189668.0
E01b_170m	356479.5	189659.8
E01b_180m	356473.7	189651.6
E01b_190m	356468.0	189643.4
E01b_200m	356462.3	189635.2
E02a_2.3m	354467.3	191138.0
E02a_10m	354469.3	191145.4

E02a_20m	354471.9	191155.1
E02a_30m	354474.5	191164.8
E02a_40m	354477.1	191174.4
E02a_50m	354479.7	191184.1
E02a_60m	354482.3	191193.7
E02a_70m	354484.8	191203.4
E02a_80m	354487.4	191213.1
E02a_90m	354490.0	191222.7
E02a_100m	354492.6	191232.4
E02a_110m	354495.2	191242.0
E02a_120m	354497.8	191251.7
E02a_130m	354500.4	191261.4
E02a_140m	354503.0	191271.0
E02a_150m	354505.6	191280.7
E02a_160m	354508.1	191290.3
E02a_170m	354510.7	191300.0
E02a_180m	354513.3	191309.6
E02a_190m	354515.9	191319.3
E02a_200m	354518.5	191329.0
E02b_4.3m	354452.1	191117.7
E02b_10m	354450.4	191112.2
E02b_20m	354447.5	191102.7
E02b_30m	354444.6	191093.1
E02b_40m	354441.6	191083.5
E02b_50m	354438.7	191074.0
E02b_60m	354435.8	191064.4
E02b_70m	354432.9	191054.9
E02b_80m	354429.9	191045.3
E02b_90m	354427.0	191035.7
E02b_100m	354424.1	191026.2
E02b_110m	354421.2	191016.6
E02b_120m	354418.3	191007.0
E02b_130m	354415.3	190997.5
E02b_140m	354412.4	190987.9
E02b_150m	354409.5	190978.3
E02b_160m	354406.6	190968.8
E02b_170m	354403.6	190959.2
E02b_180m	354400.7	190949.7
E02b_190m	354397.8	190940.1
E02b_200m	354394.9	190930.5
E03_0.8m	353324.4	208406.8
E03_10m	353316.9	208412.0
E03_20m	353308.7	208417.8
E03_30m	353300.5	208423.5
E03_40m	353292.3	208429.2
E03_50m	353284.1	208435.0
E03_60m	353275.9	208440.7

E03_70m	353267.7	208446.4
E03_80m	353259.5	208452.2
E03_90m	353251.3	208457.9
E03_100m	353243.1	208463.7
E03_110m	353234.9	208469.4
E03_120m	353226.7	208475.1
E03_130m	353218.6	208480.9
E03_140m	353210.4	208486.6
E03_150m	353202.2	208492.3
E03_160m	353194.0	208498.1
E03_170m	353185.8	208503.8
E03_180m	353177.6	208509.5
E03_190m	353169.4	208515.3
E03_200m	353161.2	208521.0
E04_6.5m	352756.9	211104.6
E04_10m	352753.6	211103.6
E04_20m	352744.0	211100.9
E04_30m	352734.3	211098.1
E04_40m	352724.7	211095.4
E04_50m	352715.1	211092.6
E04_60m	352705.5	211089.9
E04_70m	352695.9	211087.1
E04_80m	352686.3	211084.4
E04_90m	352676.7	211081.6
E04_100m	352667.1	211078.8
E04_110m	352657.4	211076.1
E04_120m	352647.8	211073.3
E04_130m	352638.2	211070.6
E04_140m	352628.6	211067.8
E04_150m	352619.0	211065.1
E04_160m	352609.4	211062.3
E04_170m	352599.8	211059.5
E04_180m	352590.2	211056.8
E04_190m	352580.5	211054.0
E04_200m	352570.9	211051.3
E05_53.1m	352369.8	213840.0
E05_60m	352374.1	213834.7
E05_70m	352380.4	213826.9
E05_80m	352386.7	213819.1
E05_90m	352393.0	213811.3
E05_100m	352399.3	213803.6
E05_110m	352405.6	213795.8
E05_120m	352411.9	213788.0
E05_130m	352418.2	213780.3
E05_140m	352424.4	213772.5
E05_150m	352430.7	213764.7
E05_160m	352437.0	213756.9

E05_170m	352443.3	213749.2
E05_180m	352449.6	213741.4
E05_190m	352455.9	213733.6
E05_200m	352462.2	213725.9
E06_79.5m	318536.7	213055.7
E06_80m	318536.6	213056.2
E06_90m	318535.4	213066.1
E06_100m	318534.2	213076.1
E06_110m	318532.9	213086.0
E06_120m	318531.7	213095.9
E06_130m	318530.5	213105.8
E06_140m	318529.3	213115.8
E06_150m	318528.1	213125.7
E06_160m	318526.8	213135.6
E06_170m	318525.6	213145.6
E06_180m	318524.4	213155.5
E06_190m	318523.2	213165.4
E06_200m	318522.0	213175.3
E07a_5m	321802.8	212685.1
E07a_10m	321804.5	212680.4
E07a_20m	321807.9	212671.1
E07a_30m	321811.3	212661.6
E07a_40m	321814.7	212652.3
E07a_50m	321818.2	212642.9
E07a_60m	321821.6	212633.5
E07a_70m	321825.0	212624.1
E07a_80m	321828.4	212614.7
E07a_90m	321831.8	212605.3
E07a_100m	321835.3	212595.9
E07a_110m	321838.7	212586.5
E07a_120m	321842.1	212577.1
E07a_130m	321845.5	212567.7
E07a_140m	321848.9	212558.3
E07a_150m	321852.3	212548.9
E07a_160m	321855.8	212539.5
E07a_170m	321859.2	212530.1
E07a_180m	321862.6	212520.7
E07a_190m	321866.0	212511.3
E07a_200m	321869.4	212501.9
E07b_5m	321793.5	212712.2
E07b_10m	321791.8	212716.9
E07b_20m	321788.3	212726.3
E07b_30m	321784.9	212735.7
E07b_40m	321781.5	212745.1
E07b_50m	321778.1	212754.5
E07b_60m	321774.7	212763.9
E07b_70m	321771.3	212773.3

E07b_80m	321767.8	212782.7
E07b_90m	321764.4	212792.1
E07b_100m	321761.0	212801.5
E07b_110m	321757.6	212810.9
E07b_120m	321754.2	212820.3
E07b_130m	321750.7	212829.7
E07b_140m	321747.3	212839.1
E07b_150m	321743.9	212848.5
E07b_160m	321740.5	212857.9
E07b_170m	321737.0	212867.3
E07b_180m	321733.6	212876.7
E07b_190m	321730.2	212886.1
E07b_200m	321726.8	212895.5

Appendix D Severn Estuary Visitor Survey Technical Note

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HRAs of the Monmouthshire and Torfaen RLDPs - Deposit Plans

Project ref:

To:
[redacted]

From:
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Date:
11 July 2022

Memo

Subject: Severn Estuary SPA / Ramsar / SAC Visitor Survey Results

Background to the Visitor Survey

To obtain visitor data for the Severn Estuary SPA / Ramsar (and also the SAC), AECOM commissioned Strategic Research and Insight (SRI) to undertake a survey (comprising visitor counts and interviews) at four key access locations along the estuary. The survey followed a similar methodology to surveys carried out by Footprint Ecology in other European sites, which have provided the evidence base for numerous Habitats Regulations Assessments. To summarise, the key features of the survey methodology were:

- The interviewer roamed the survey location and approached first adult seen (alone or part of a larger group) for interview – the interview involved a set of questions to obtain key information such as activity undertaken and home postcode; upon completion of the interview the next adult is approached
- The interviewer counted the number of adults, minors and dog walkers to get an overview of the 'busyness' of the site at a given location
- The survey day was divided into a morning (07:30 to 12:30) and an afternoon shift (12:30 to 17:30)
- Each location was surveyed on two days, a weekday (Monday to Friday) and a weekend day (Saturday and Sunday), avoiding public holidays and special events resulting in high footfall

Using satellite imagery and in collaboration with Monmouthshire's and Torfaen's Countryside Teams, AECOM identified four key access locations to the Severn Estuary SPA / Ramsar / SAC based on their proximity to existing conurbations, the presence of parking opportunities and dedicated foot access points. The following locations from east to west along the estuary were identified for surveying (see Figure 4 in Appendix A):

- Caldicot Coast Path (ST 48103 87124)
- Black Rock Car Park (ST 51308 88083)
- RSPB Newport Wetlands (ST 32771 82905)
- Lighthouse Inn Car Park (ST 30030 81596)

It is to be noted that the visitor survey was paused on the 16th of March 2020 due to the outbreak of the Coronavirus pandemic. Following the end of COVID restrictions, the survey was continued on the 4th of March 2022. The non-breeding season was targeted for survey because, while visitor numbers will be lower than in the late spring and summer, the non-breeding period is when the flocks of disturbance-sensitive

waterfowl and waders congregate in the estuary. These data provide the only standardised evidence base that is available for the Welsh stretch of the Severn Estuary SPA / Ramsar / SAC.

Key Results

Visitor Counts

Table 1: Visitor counts (including adults and minors) at access points to the Severn Estuary SPA / Ramsar / SAC provided as totals and split by weekday / weekend.

Survey Location	Visitor Count Weekday	Visitor Count Weekend	Total Visitor Count
Caldicot Coast Path	73	54	127
Black Rock Car Park	58	212	268
RSPB Newport Wetlands	135	478	613
Lighthouse Inn Car Park	50	97	147

The total number of visitors varied significantly between survey locations. The RSPB Newport Wetlands was by far the busiest survey point (613 visitors over two survey days), followed by the Black Rock Car Park (268 visitors), Lighthouse Inn Car Park (147 visitors) and Caldicot Coast Path (127 visitors). The relatively low visitor count at Caldicot is most likely due to it providing foot access only, whereas all other survey locations adjoin car parks. This increases accessibility and is expected to draw visitors from further afield, resulting in higher overall busyness.

In context, it appears that the stretch of the Severn Estuary SPA / Ramsar / SAC in southern Wales is busier than parts in other authorities, such as the Forest of Dean in England. For example, a visitor survey in Lydney showed that the busiest location had 98 people entering over two days[1]. That is a similar count to the one obtained for Lighthouse Inn Car Park in a single day of surveying. Visitor numbers ranged between 8 and 153 people across 20 survey locations in a survey conducted in the Humber Estuary[2]. Overall, these data indicate that the Severn Estuary SPA / Ramsar / SAC in Monmouthshire is already a key recreation destination for people (even in winter) and would be highly attractive to new residents moving to the wider area around the site. It also implies that recreational pressure is an impact pathway requiring thorough assessment in relation to future housing growth.

Table 2: Local Authorities from which visitors to the Severn Estuary SPA / Ramsar / SAC derived. Only authorities contributing over 1% to the recreational burden are shown.

Source of Visitors (Local Authority)	Number of Visitors	Percentage of Visitors (%)
Monmouthshire	80	44.4
Newport	40	22.2
Cardiff	12	6.7
Caerphilly	10	5.6

[1] Liley D, Panter C & Hoskin R. (2017). Lydney Severn Estuary Visitor Survey and Recreation Strategy. Unpublished report by Footprint Ecology for the Forest of Dean District Council.
[2] Fearnley H, Liley D & Cruickshanks K. (2012). Results of the recreational visitor surveys across the Humber Estuary. Unpublished report by Footprint Ecology for the Humber Management Scheme.

Torfaen	5	2.8
Forest of Dean	3	1.7
Bristol	2	1.1
Wiltshire	2	1.1
Total	**188**	**100**

The geographic source of visitors was also assessed. Of the 188 interviewees, 80 (44.4%) visitors derive from Monmouthshire, the authority within which the surveyed stretch of the Severn Estuary SPA / Ramsar / SAC lies (Table 2). The second biggest contribution is made by Newport, where 40 (22.2%) of the interviewees live. Together, Monmouthshire and Cardiff account for 66.6% of the recreational burden in the estuary. Notable origins of visitors were also Cardiff (12 interviewees, 6.7%), Caerphilly (10 interviewees, 5.6%) and Torfaen (5 interviewees, 2.8%). It is noted that, while visitors from Torfaen were recorded within the SPA / Ramsar / SAC, these fall outside the defined core recreational catchment of the site, based on the distance that 75% of visitors travel to their destination (see section ‘Implications for the Torfaen RLDP’).

Visitor Interviews

The focus of this assessment was primarily to capture a large enough number of interviews to provide a robust randomised selection of opinions and home postcodes from people that visit the Severn Estuary SPA / Ramsar / SAC in order to understand recreational behaviour and to define a core recreational catchment within which increases in the resident population can be expected to translate into increases in visitor pressure. Overall, a total of 188 visitor interviews were undertaken, including 45 interviews (23.9%) at Caldicot Coast Path, 52 interviews (27.7%) at Black Rock Car Park, 55 interviews (29.2%) at the RSPB Newport Wetlands and 36 interviews (19.1%) at the Lighthouse Inn Car Par.

Activities and Mode of Transport

Dog walking was by far the most common recreational activity (92 interviewees, 48.9%), followed by walking (56 interviewees, 29.8%) and visitors on a family outing (11 interviewees, 5.9%; see Figure 1). Several interviewees were engaging in wildlife watching (9 interviewees, 4.8%) and ‘other’ activities (8 interviewees, 4.3%). The proportion of different activities recorded was relatively consistent between survey points, except for the RSPB Newport Wetlands. At this survey location only six dog walkers were interviewed (10.9%), compared to 32 people that were walking (58.2%) and eight visitors that were wildlife watching (14.5%). In contrast, dog walking was most frequent at Black Rock Car Park (36 out of 52 interviewees, 69.2%) and Caldicot Coast Path (29 out of 45 interviewees, 64.4%). The most probable explanation for this trend is that these locations provide easy foot access from nearby residential development in Portskewett and Caldicot, a factor that is important for most dog walkers. This interpretation is supported by the mode of transport provided by interviewees, particularly at Caldicot. At this survey point, 33 (73.3%) of the interviewees travelled to the site on foot, indicating that this access point is mainly used by locals. In contrast, the RSPB Newport Wetlands (52 interviewees, 94.5%) and the Lighthouse Inn Car Park (28 interviewees, 77.8%) travelled to the site by car, indicating that these car parks attract visitors from further afield.

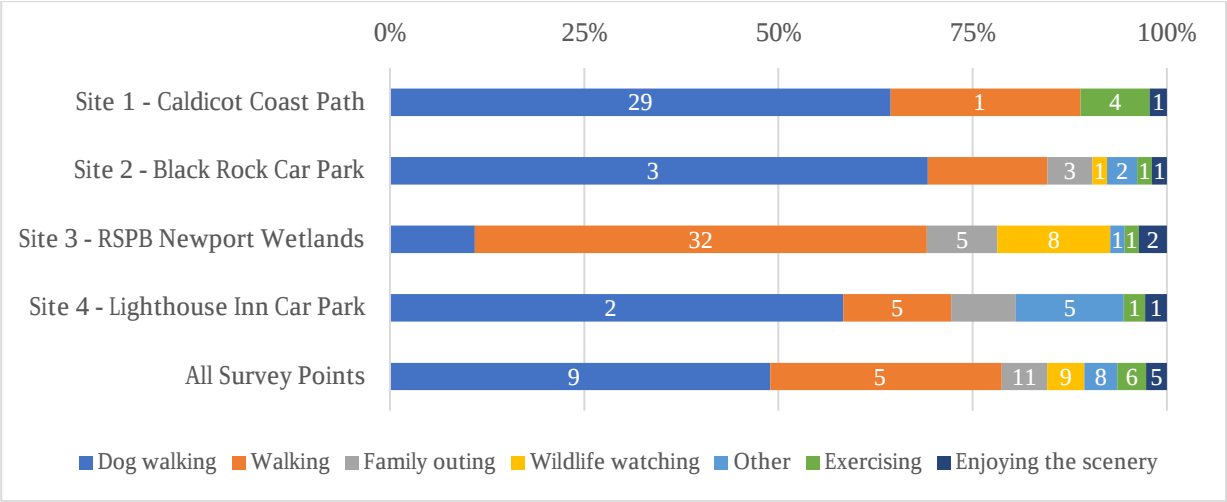


Figure 1: Main activities undertaken by interviewees in the Severn Estuary SPA / Ramsar / SAC across the four survey points.

Reasons for Visit

One of the main objectives of the visitor survey was to identify the main reasons for why visitors are drawn to the Severn Estuary SPA / Ramsar / SAC. By far the most important factor for visiting the estuary was 'proximity to home' (93 interviewees, 49.7%; Figure 2), followed by 'natural scenery' (24 interviewees, 12.8%), presence of the 'coast / estuary' (10 interviewees, 5.3%), 'good / easy parking' (9 interviewees, 4.8%) and 'quick travel route' (8 interviewees, 4.3%). Surprisingly, despite the high number of dog walkers interviewed at the site, relatively few interviewees provided dog-related reasons for visiting, including 'good for dog / dog enjoys it' (6 interviewees, 3.2%), 'ability to let dog roam off lead' (4 interviewees, 2.1%) and 'nearest safe place to let dog off lead' (4 interviewees, 2.1%). Identifying the main reasons for site choice is important in understanding visitor motivations and identifying potential opportunities for mitigation such as part of Suitable Alternative Natural Greenspaces (SANGs).

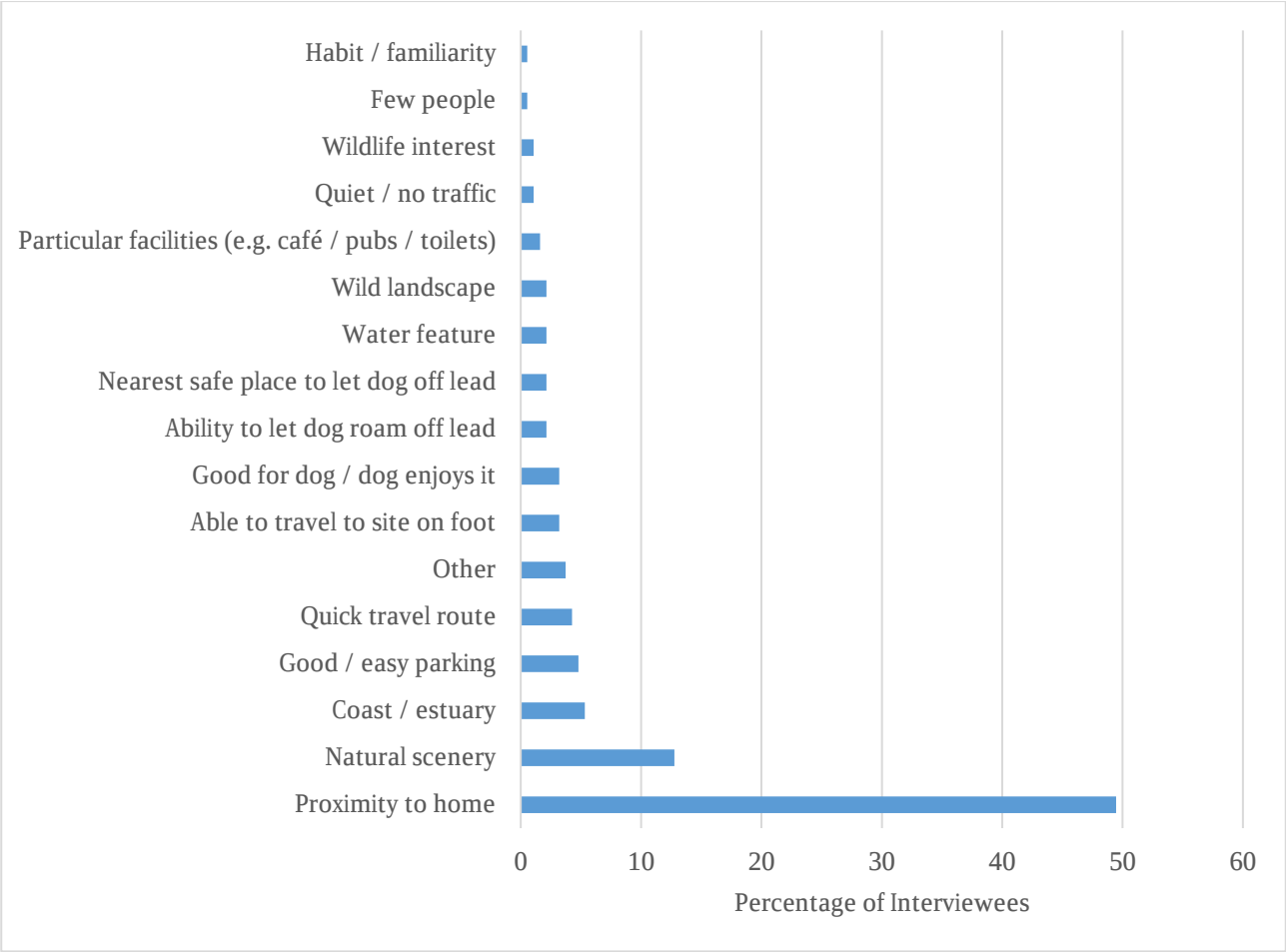


Figure 2: Main reasons for visiting the Severn Estuary SPA / Ramsar / SAC provided by interviewees.

Temporal Characteristics

Regarding the temporal characteristics of recreational pressure in the Severn Estuary SPA / Ramsar / SAC, an important trend is that more than half of interviewees (97 interviewees, 51.6%) visit the estuary frequently (i.e. they visit daily, most days or 1 to 3 times per week). Thirty-nine interviewees visit daily (20.7%), 16 come to the site on most days (180+ visits per annum; 8.5%) and 42 interviewees visit one to three times per week (40-180 visits per annum; 22.3%). The proportion of frequent visitors was by far the highest at Caldicot Coast Path (37 interviewees being high frequency visitors, 82.2%), providing further support to the notion that visitors to this stretch of the coast originate locally from the Caldicot area. Another trend that supports the notion of the estuary being primarily a local recreational resource is the relatively short duration of visits. 152 out of 188 interviewees (80.9%) stated that their visits last 'less than 30 minutes', 'between 30 minutes and 1 hour' and between '1-2 hours'. An exception is the RSPB Newport Wetlands site, where larger proportions of visitors stay on site between '2-3 hours' (16 interviewees, 29.1%) and '3-4 hours' (3 interviewees, 5.5%) compared to the other survey locations. Time spent on site is a major factor in determining the magnitude of recreational pressure, with longer visits likely to result in more disturbance events compared to shorter ones. Only a weak seasonal trend was discernible from the responses of interviewees. While most interviewees stated that they visit in summer (150 interviewees, 80%), visitation was only marginally lower in spring (148 interviewees, 79%), autumn (136 interviewees, 72%) and winter (132 interviewees, 70%). This is an important result because it implies that recreational pressure in the Severn Estuary SPA / Ramsar is relatively consistent across the year, including the sensitive overwintering period for the qualifying bird species (winter and early spring).

Home Postcodes

The home postcodes of interviewees provide the key most important parameter that is used to identify recreational catchments. Typically, the 75th percentile of interviewees (i.e. the distance from the SPA / Ramsar from which 75% of interviewees originate) is used to denote the core recreational catchment. This

cut-off point is used to remove the influence of outliers and to demark the catchment that forms the most likely visitor pool. Pooling the postcodes from all 'local' visitors (i.e. those on a day trip from home; n = 158), 75% of visitors travelled a linear Euclidean distance of 6.5km to the SPA / Ramsar. This core recreational catchment is broadly similar to those identified for stretches of the estuary in other geographic areas. For example, a visitor survey carried out in the estuary in Stroud District established a core catchment of 7.7km for that authority. Survey work undertaken for the West of England authorities delineated a core catchment of 7.36km for survey points in North Somerset and South Gloucestershire. One notable aspect of the various surveys undertaken in the Severn Estuary SPA / Ramsar / SAC is that the core recreational catchments, even though the surveys have been undertaken for different authorities, have a broad consistency of approx. 7km regarding the core catchment identified. This is useful since it is standard practice when European sites are involved for the affected authorities to agree on a standardized core catchment. For the Severn Estuary SPA / Ramsar / SAC it appears that 7km is a reasonable precautionary recreational buffer for all European sites.

Core recreational catchments were also drawn up for dog walkers and frequent visitors (ranging from daily visits to several visits per week). This was done to delineate the geographic zone that user groups with the highest ecological impacts on overwintering birds derive from. For dog walkers the core recreational catchment is approx. 3.1km, whereas for frequent visitors the core catchment is approx. 1.9km. This is notable because it highlights that the visitors with the highest impact potential come from a relatively small zone around the European sites. Notwithstanding this, in line with other visitor surveys and the evidence for other European sites, it is precautionary and advisable to work with the larger catchment of 7km.

Implications for the Torfaen RLDP

The data from the visitor survey presented here indicate that residential development coming forward in Torfaen does not fall within the core recreational catchment of 7km identified for the Severn Estuary SPA / Ramsar / SAC. While a total of 5 residents (2.8%) from Torfaen were interviewed in the estuary, the interviewee living closest to the site had travelled 8.8km from home, which is well beyond the 75th percentile of visitors. Applying the widely accepted methodology for delineating recreational catchments, Torfaen residents are not considered to meaningfully contribute to recreational impacts in the SPA / Ramsar / SAC. Therefore, housing that is projected to come forward under the Torfaen RLDP will not require mitigation.

Implications for the Monmouthshire RLDP

The data from the visitor survey presented here, which suggest that Monmouthshire contributes by far the highest proportion of visitor pressure in the stretch of the Severn Estuary SPA / Ramsar / SAC that was surveyed, have implications for the emerging Monmouthshire RLDP. Two of the Strategic Growth Areas identified in the RLDP (Severnside and Chepstow) lie within the core recreational catchment of the Severn Estuary SPA / Ramsar / SAC, particularly the easternmost stretch of the estuary including the Caldicot Coast Path and the Black Rock Car Park. The catchment zones for dog walkers and frequent visitors, the user groups with the highest disturbance impacts, include both these Strategic Growth Areas. Furthermore, of the 188 interviewees, 19 (23.8%) live in Caldicot, further underlining the importance of this part of Monmouthshire to the SPA's / Ramsar's / SAC's visitor pool.

Given the high sensitivity of the SPA / Ramsar to impacts from recreational pressure, adverse effects on its site integrity due to additional residential development cannot be excluded. It is anticipated that mitigation measures will be required to avoid adverse effects on the SPA / Ramsar. These could be delivered in the form of Strategic Access Management and Monitoring (SAMM) in the estuary itself, and / or through access enhancements and improvements to appropriately sited, existing or newly developed greenspaces (e.g. SANGs, if delivered to stringent guidelines). This memo does not propose or develop a full mitigation strategy, but rather identifies the options that are available to the Council to address the issue of recreational pressure.

In England, authorities within the core recreational catchment of European sites that are sensitive to recreational pressure have developed SAMM strategies to avoid adverse effects on the European sites; the most prominent examples being the Thames Basin Heaths SPA and the Dorset Heaths SPA. For example, to protect the Dorset Heaths, the relevant authorities have set out the Dorset Heathlands Planning Framework

Supplementary Planning Document (SPD)[3]. The SPD proposes a series of projects, including educational activities and on-site wardens to manage visitor pressure. The funding for these measures is collected through a combination of Community Infrastructure Levy (CIL) and Section 106 agreements (planning obligations) payable by the developer. It is considered that similar measures (and funding mechanisms) could be deployed for the Severn Estuary SPA / Ramsar / SAC, to help manage recreational pressure. Such measures would have to be identified and developed in collaboration with all key stakeholders (i.e. authorities, private landowners) and in consultation with Natural Resources Wales.

SAMM

The visitor survey data indicate that there are ample opportunities for SAMM projects in Monmouthshire's section of the Severn Estuary SPA / Ramsar / SAC. Most visitors are not aware of (125 interviewees, 66.5%) or unsure (21 interviewees, 11.2%) whether any conservation designations apply to the site. Furthermore, only one interviewee (0.5%) indicated that they knew about the site's SPA / Ramsar status and its international importance to overwintering birds. Regarding active conservation measures, a total of 87 interviewees (46.3%) had come across information boards along the estuary. Only 18 interviewees (9.6%) indicated that they were aware of any signage (e.g. dog-on-lead signs) along the estuary. Furthermore, only 3 interviewees (1.6%) had noticed a ranger presence along the estuary. These were all recorded at the RSPB Newport Wetlands, indicating that these are likely to have been RSPB employees rather than rangers specifically managing recreation in the estuary. Overall, 82 interviewees (43.6%) are not aware of any measures that are in place to deliver conservation in the SPA / Ramsar / SAC. Therefore, various SAMM measures along the estuary could be deployed to decrease the likely impact of future housing growth delivered under the RLDP. For example, enhanced signage (e.g. dog-on-lead signs covering the overwintering period) along the estuary is likely to increase public awareness and reduce disturbance to sensitive bird species. Changes in how the estuary is managed may also be beneficial to the Severn Estuary SPA / Ramsar / SAC, provided they support the site Conservation Objectives. While 155 interviewees (82.5%) did not provide any changes they would like to see in how the area is managed, 23 interviewees (12.2%) highlighted footpath improvements (particularly in Caldicot) and 5 interviewees (2.7%) wanted more dog bins (Figure 3). Improvements to footpaths along the estuary could be a key tool in discouraging off-track walking and reducing the number of major bird disturbance events.

A Recreation & Management Strategy (RMS) covering the Severn Estuary SPA / Ramsar / SAC is already in place for Stroud District, which aims at mitigating the 12,600 dwellings to be delivered over the Plan period. A similar approach could be adopted for Monmouthshire, which could take a lead in delivering a recreation management strategy in cross-boundary collaboration with other authorities in the area, such as Cardiff and Newport. The RMS proposes a range of mitigation approaches to be adopted for the estuary, including:

- Engaging with and educating dog walkers to raise awareness of disturbance issues and promote low-sensitivity sites and / or routes;
- Establishing a warden role for visitor engagement, targeting highly sensitive locations or focal areas with high visitor numbers;
- Reviewing and adapting parking opportunities to alter the spatial distribution of visitors along the estuary;
- Introducing Codes of Conduct that raise awareness and promote sustainable recreational use, particularly for wog walkers; and
- Ongoing monitoring of visitor numbers in line with 5-yearly LDP reviews to identify changes in use over time and evaluate the effectiveness of mitigation interventions put in place.

[3] The consultation draft of the Dorset Heathlands Planning Framework 2020-2025 can be found at: https://www.bournemouth.gov.uk/planningbuilding/PlanningPolicy/PlanningPolicyFiles/dorset-heathlands-planning-framework/dorset-heathlands-spd-2019-consultation.pdf [Accessed on the 30/06/2020].

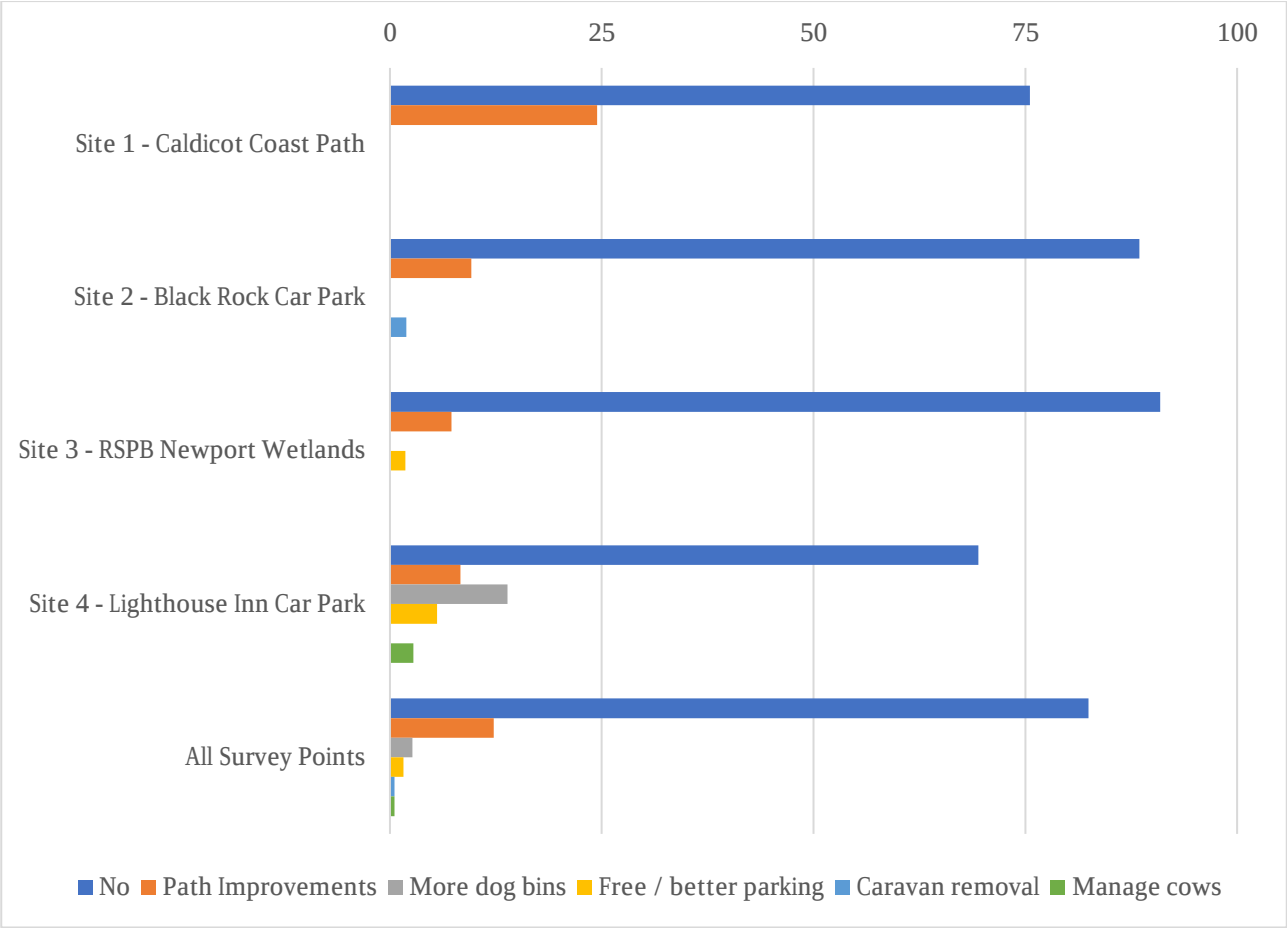


Figure 3: Changes interviewees would like to see in how the Severn Estuary SPA / Ramsar / SAC is managed across the four survey points.

Alternative Greenspaces

Enhancing existing greenspaces or opening new areas of greenspace to public access is the second pillar of mitigating recreational pressure. The rationale behind alternative greenspace provision is to attract a certain proportion of local residents, thereby reducing the recreational burden in more sensitive European sites. Understanding the factors underpinning site choice (see Figure 2) is important in devising effective mitigation approaches. As highlighted in the previous section, the main reasons for visiting the estuary included proximity to home (49.7%), natural scenery (12.8%), coast / estuary (5.3%), good / easy parking (4.8%) and quick travel route (4.3%). Some of these features, such as presence of the coast / estuary and natural scenery, will be impossible or difficult to recreate in alternative local greenspaces. Other characteristics (e.g. proximity to home and parking) are well recognised determinants of site choice and have influenced the greenspace provision underpinning many mitigation strategies in England. Alternative greenspaces should be adequately sited and designed to represent a realistic alternative to local residents, ideally being more attractive to potential users than the European sites themselves. In England, Natural England has published guidelines for the provision of Suitable Alternative Natural Greenspaces to mitigate recreational pressure in the Thames Basin Heaths SPA. These encompass a range of must-have parameters, including some of the characteristics mentioned by visitors to the Severn Estuary SPA / Ramsar / SAC such as the availability of parking, a well-maintained network of paths, habitat variety and suitable geographic location in relation to the proposed housing development.

Regarding the Monmouthshire RLDP, the Strategic Growth Areas of Caldicot and Chepstow, both within the core catchment of the Severn Estuary SPA / Ramsar / SAC, should be the main focus of mitigation. A review of satellite imagery on Google Maps indicates that there are extensive tracts of agricultural fields, grassland and woodland surrounding the two SGAs, which could form the starting point for evaluating alternative greenspace provision. In the first instance, this would entail a detailed site appraisal and early engagement with landowners to explore initial feasibility. The most obvious candidate site for improvements is the Caldicot

Castle Country Park (CCCP), which is approximately equidistant from existing residential development in Caldicot compared to the Severn Estuary SPA / Ramsar / SAC, thus representing a realistic alternative location geographically. The CCCP is owned and operated by Monmouthshire County Council, which would facilitate the delivery of mitigation measures compared to sites under multiple ownership. It is noted that the CCCP is already an attractive destination for visitors[4] and any mitigation measures would have to improve the capacity of the park to attract further visitors. A list of potential enhancements may include[5]:

- Provision of a variety of routes (ideally at least one circular route) leading out from the castle into the woodland;
- Enhancements to the existing main car park off Church Road (e.g. increasing capacity, renewing surfacing, etc.);
- Provision of enhanced information boards along the key walking routes, which may address the cultural / historical heritage of the CCCP and ecological interest features in the site; and
- Incorporation of Nedern Brook as a main feature into the walking routes starting at the Castle.

Notwithstanding the provision of enhanced local greenspaces, it is noted that these are unlikely to fully mitigate the increase in recreational pressure on European sites. Estuarine and coastal sites (such as the Severn Estuary SPA / Ramsar / SAC) have unique recreational draws (illustrated by large core catchment zones) and will continue to attract visitors regardless of destination alternatives. Any improvements to existing or new local greenspaces will fulfil their primary role in attracting local residents that undertake frequent and relatively short outings, including dog walkers, walkers and people exercising. Therefore, alternative greenspace provision could be particularly effective for residential development in the Caldicot and Chepstow SGAs.

AECOM recommends that Natural Resources Wales is consulted in the next instance to assess any implications arising from the visitor survey. This would include setting the growth projected in the RLDP into the context of existing concerns regarding the qualifying features of the SPA / Ramsar / SAC. Following consultation, the next stage in the delivery of mitigation would be to develop a detailed list of interventions, identify their governance body and explore potential funding mechanisms.

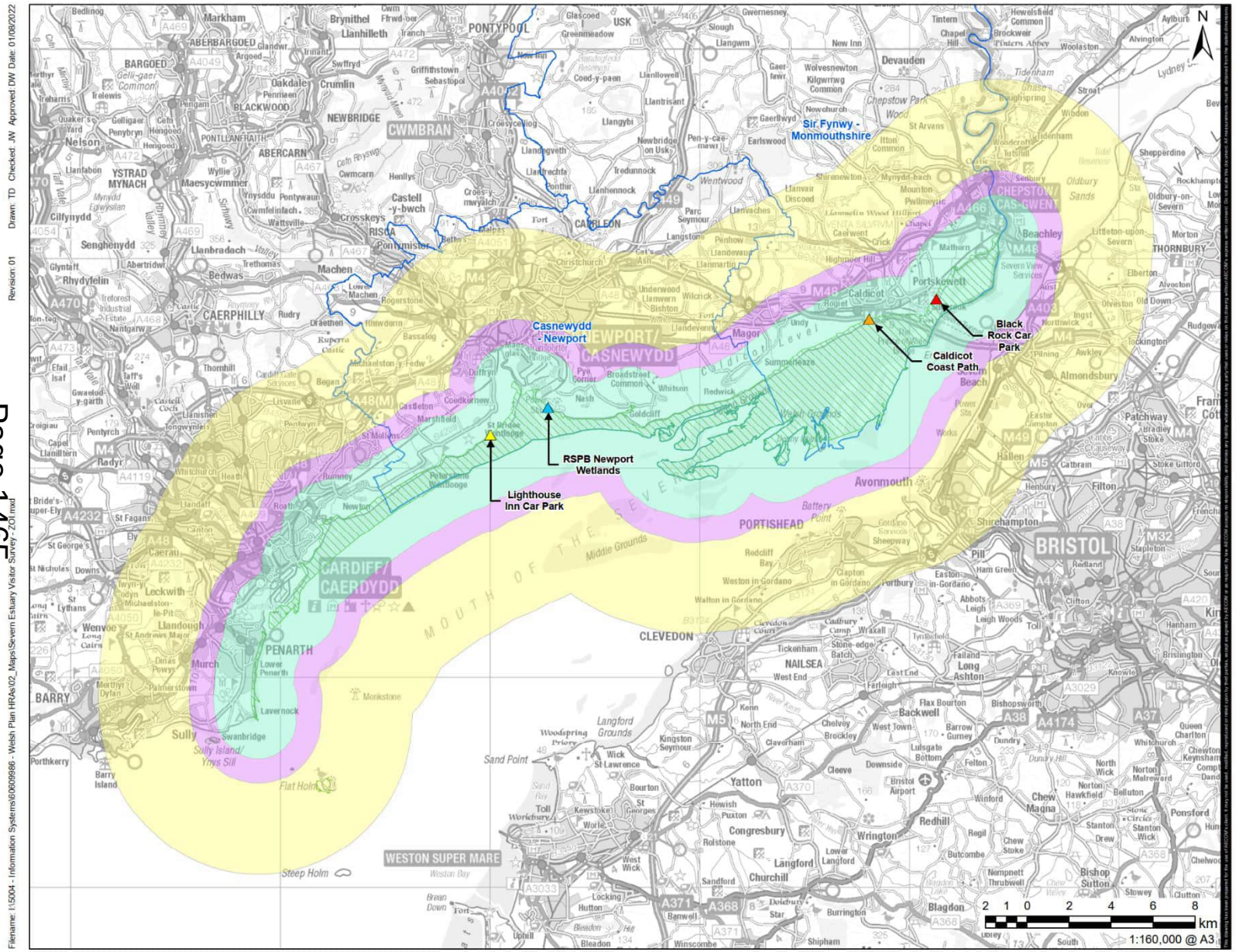
It is concluded that, provided an appropriate set of mitigation measures in and / or the wider area around the Severn Estuary SPA / Ramsar / SAC is delivered in agreement with the Natural Resources Wales, the Monmouthshire RLDP will not result in adverse effects on site integrity regarding recreational pressure.

[4] The Caldicot Castle Country Park is widely advertised as an attractive destination for outings, for example on the Monmouthshire tourism website available at: https://www.visitmonmouthshire.com/Caldicot-Caldicot-Castle-and-Country-Park/details/?dms=3&venue=1000670 [Accessed on the 30/06/2020].

[5] Note that rather than focussing on a specific site, greenspace enhancements may also be delivered as a series of small-scale projects designed to improve access to multiple greenspaces or to encourage responsible recreation in the estuary. This would be analogous to the Heathland Infrastructure Projects (HIPs) delivered to mitigate recreational pressure in the Dorset Heaths SPA.

Appendix A Maps

Figure 4: Map of locations surveyed along the Severn Estuary SPA / Ramsar / SAC in Monmouthshire and Newport.



Filename: I:\5004 - Information Systems\60609986 - Welsh Plan HRAs\02_Maps\Severn Estuary Visitor Survey - ZOI.mxd Drawn: TD Checked: JW Approved: DW Date: 01/08/2022 Revision: 01

AECOM

PROJECT
HRAs for the Monmouthshire and Torfaen Replacement Development Plans

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LEGEND

Survey Location
- Site 1 - Caldicot Coast Path
- Site 2 - Black Rock Car Park
- Site 3 - RSPB Newport Wetlands
- Site 4 - Lighthouse Inn Car Park
- Severn Estuary Special Protection Area & Ramsar
- Authority Boundary

Zone of Influence
- Frequent Visitors - 1.8km
- Dog Walking - 2.97km
- All Interviewees - 7.3km

NOTES
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ISSUE PURPOSE
DRAFT

PROJECT NUMBER
60609986

SHEET TITLE
Severn Estuary Zone of Influence

SHEET NUMBER
Figure 5

Appendix E Wye Valley Woodlands Visitor Survey Technical Note

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Project name:
HRAs of the Monmouthshire RLDP - Deposit Plan

Project ref:

To:
[redacted]

From:
Damiano Weitowitz

Date:
26 October 2023

Memo

Subject: Wye Valley Woodlands SAC Visitor Survey Results

Background to the 2023 Visitor Survey

To obtain visitor data for the Wye Valley Woodlands SAC, AECOM commissioned Strategic Research and Insight (SRI) to undertake a survey (comprising visitor counts and interviews) at two key access locations agreed with Monmouthshire Council. The survey followed a similar methodology to surveys carried out by AECOM in the Severn Estuary SPA/Ramsar/SAC, and Footprint Ecology in other European sites, which have provided the evidence base for numerous Habitats Regulations Assessments. To summarise, the key features of the survey methodology were:

- The interviewer roamed the survey location and approached first adult seen (alone or part of a larger group) for interview – the interview involved a set of questions to obtain key information such as activity undertaken and home postcode; upon completion of the interview the next adult is approached;
- The interviewer counted the number of adults, minors and dog walkers to get an overview of the 'busyness' of the site at a given location;
- The survey day was divided into a morning (07:30 to 12:30) and an afternoon shift (12:30 to 17:30);
- Each location was surveyed on two days, a weekday (Monday to Friday) and a weekend day (Saturday and Sunday), in summer 2023, avoiding public holidays and special events resulting in high footfall; and
- A total of 16 hours of survey was therefore undertaken at each of the two survey locations, split into 4 weekend 5-hr shifts (2 morning, 2 afternoon) and 4 weekday 5-hr shifts (2 morning, 2 afternoon) per site.

Using satellite imagery and in collaboration with Monmouthshire's Countryside Team, AECOM identified two key access locations to the SAC based on their proximity to existing conurbations, the presence of parking opportunities and dedicated foot access points directly into the SAC. These were:

- Lower Wyndcliff Car Park (ST 52669716)
- Chepstow Leisure Centre (ST 52889432)

Key Results

Visitor Counts

Table 1: Visitor counts (including adults and minors) at access points to the Wye Valley Woodlands SAC provided as totals and split by weekday / weekend.

Survey Location	Visitor Count Weekday	Visitor Count Weekend	Total Visitor Count
Lower Wyndcliff Car Park	66	92	158
Chepstow Leisure Centre	54	75	129

At Lower Wyndcliff Car Park, a total of 158 people were recorded entering the SAC over 16hrs of survey, equating to an average of 10 people per hour. At Chepstow Leisure Centre, 129 people were recorded entering the SAC over 16hrs of survey, equating to an average of 8 people per hour. Compared to surveys for other European sites in Monmouthshire this is modest. For example, during the surveys of the Severn Estuary in Monmouthshire in the winters of 2020-22, an average of 38 people per hour were recorded at RSPB Newport Wetlands, and 16.75 per hour were recorded at Black Rock Car Park. Moreover, that level of visitor activity was recorded in winter. In summer, levels of use at the Severn Estuary can be expected to be even greater. The face-to-face surveys also suggest relatively lower use of Wye Valley Woodlands SAC than other European sites. Over this standardised survey period it is typical to achieve 12 interviews in a 5hr shift. In this case an average of just 5.4 per 5hr shift was achieved (a total of 65 interviews). This reflects relatively low footfall.

Visitor Interviews

The focus of this assessment was primarily to capture interviews to provide a randomised selection of opinions and home postcodes from people that visit Wye Valley Woodlands SAC in order to understand recreational behaviour and to define a core recreational catchment within which increases in the resident population can be expected to translate into increases in visitor pressure. A total of 65 visitor interviews were undertaken, including 29 interviews (45%) at Chepstow Leisure Centre and 36 interviews (55%) at Lower Wyndcliff Car Park.

Activities and Mode of Transport

Walking was by far the most common recreational activity (38 interviewees, 58.5%), followed by dog walking (22 interviewees, 33.8%). A total of 92.3% of survey respondents were undertaking one or the other of these activities. The proportion of different activities recorded was relatively consistent between survey points.

In terms of mode of travel to site, 22 (33.8%) of interviewees walked to site, while 42 (64.6%) drove to site. This is unsurprising given the wide diversity of home postcodes and the large geographic area they covered. This is also reflected in the relatively large proportion of visitors (17 or 26.2%) who were on holiday or otherwise staying away from home. Of Monmouthshire residents surveyed, just over half had walked to the site.

Reasons for Visit

One of the objectives of the visitor survey was to identify the main reasons for why visitors are drawn to the Wye Valley Woodlands SAC. By far the most important factor for visiting the SAC was ‘natural scenery/wild landscape’ (42 out of 65 interviewees, or 64.6%). This ties in with the large distances from across England and Wales that people are travelling to visit the site. The second most important factor (although considerably less often cited than the most important reason) was ‘proximity to home’ (24 out of 65 interviewees, 36.9%). The third, fourth and fifth most important reasons (a long way behind either first or second) were ‘other’ (8 interviewees or 12.3%), ‘easy parking’ (6 interviewees, or 9.2%) and ‘ability to travel to site on foot’ (5 interviewees or 7.7%). Where people answered ‘other’ their reasons included: ‘meeting a friend’, ‘to see Giant’s Cave’, ‘come every year in honour of father’, and ‘close to where we are camping’.

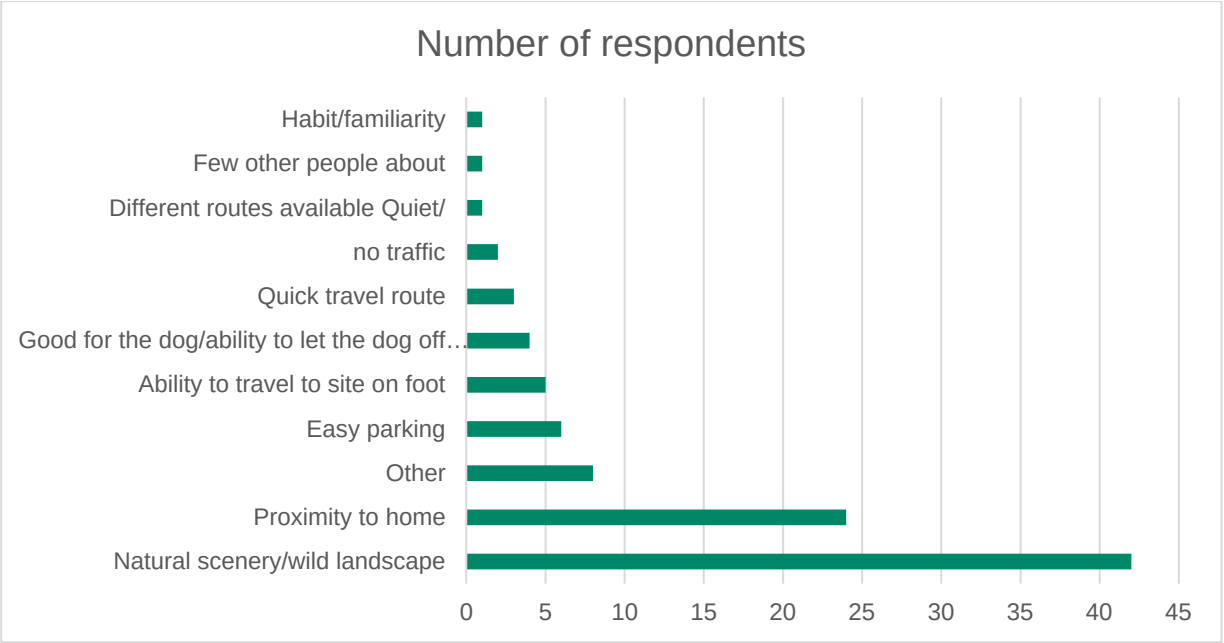


Figure 1: Main reasons for visiting the Wye Valley Woodlands SAC provided by interviewees. Note that not all interviewees provided a reason and some provided more than one reason.

Temporal Characteristics

Regarding the temporal characteristics of recreational pressure in the Wye Valley Woodlands SAC, an atypically small number of visitors (based on personal experience of surveying many European sites or reviewing such survey data) are frequent visitors. Just 13 (20%) of visitors attend the site at least once a week (i.e. said they visited the site 'daily', 'most days' or '1-3 times a week'). In contrast, 16 (24.6%) visit once a month or less, and 33 (50.8%) of survey respondents were on their first visit. Again, the large number of people on their first visit probably reflects the large number of non-locals and holidaymakers in the visitor sample.

Another trend that supports the notion of the SAC being primarily a regional or national recreational resource is the relatively long duration of visits. A total of 22 (33.8%) of survey respondents said they had spent, or intended to spend, at least three hours on site, with 17 of these (26.2% of the total) intending to spend over four hours on site. This is an unusually large proportion of visitors intending to spend a long time on site but is the response one would be more likely to expect where a relatively large number of visitors are holiday-markers or have travelled a considerable distance to the site. In contrast, during the Severn Estuary SPA/\Ramsar/SAC visitor survey, where the majority of visitors were relatively local, 80.9% of interviewees stated that their visits last less than 2 hours. In the Wye Valley Woodlands this figure drops to 60%.

Home Postcodes

The geographic source of visitors was also assessed. Of the 48 interviewees who provided valid postcodes, 14 (29.2%) derive from Monmouthshire (The face-to-face surveys also suggest relatively lower use of Wye Valley Woodlands SAC than other European sites. Over this standardised survey period it is typical to achieve 12 interviews in a 5hr shift. In this case an average of just 5.4 per 5hr shift was achieved (a total of 65 interviews). This reflects relatively low footfall.

). The second biggest contribution is made by Bristol, where 8 (16.7%) of the interviewees live. A total of 70.9% of visitors live in seven local authorities with some being as far distant as Sandwell in the West Midlands. Despite the location of the survey points within Monmouthshire, a clear majority of survey respondents (70.8%) came from outside Monmouthshire. This illustrates that the Wye Valley Woodlands SAC, based on this survey, can be considered a regional or even national draw, rather than a predominantly local attraction. This differs from the section of the Severn Estuary (for example) in Monmouthshire, where almost half (44%) of visitors were residents of Monmouthshire and two-thirds (66.6%) were residents of either Monmouthshire or Newport.

Table 2: Local Authorities from which visitors to the Wye Valley Woodlands SAC derived.

Source of Visitors (Local Authority)	Number of Visitors	Percentage of Visitors (%)
Monmouthshire	14	29.2
Bristol	8	16.7
North Somerset	3	6.2
South Gloucestershire	3	6.2
Newport	2	4.2
Forest of Dean	2	4.2
Sandwell, West Midlands	2	4.2
Bath & North-East Somerset	1	2.1
Boston, Lincolnshire	1	2.1
Dacorum, Hertfordshire	1	2.1
East Yorkshire	1	2.1
Hart, Hampshire	1	2.1
Newark & Sherwood, Nottinghamshire	1	2.1
North Devon	1	2.1
Bridgend	1	2.1
Powys	1	2.1
Sheffield, Yorkshire	1	2.1
South Oxfordshire	1	2.1
Stroud	1	2.1
Swindon	1	2.1
Torfaen	1	2.1
Total	**48**	**100**

The home postcodes of interviewees provide the key parameter that is used to identify recreational catchments. Typically, the 75th percentile of interviewees (i.e. the distance from the SAC from which 75% of

interviewees originate) is used to denote the core recreational catchment. This cut-off point is used to remove the influence of outliers and to demark the catchment that forms the most likely visitor pool.

Using these data, the 75th percentile of all visitors that travelled to the SAC is 39.3km. In other words, three quarters of visitors live within 39.3km of the SAC boundary. This is a very large catchment and represents the importance of the SAC in drawing visitors from long distances. For example, visitors come from as far afield as Lincolnshire, Sheffield, Devon, Hampshire and Nottinghamshire (Table 1), and visitors from outside Monmouthshire and Wales, make up a large proportion of the survey pool. Even excluding people on holiday to focus entirely on people 'visiting from home' still leaves a relatively large catchment of 24km. This indicates that the Wye Valley Woodlands SAC ha a regional, not to say national, draw rather than a local one. In contrast, during surveys of the Severn Estuary SPA/Ramsar/SAC, 75% of visitors lived within 6.5km of the site, indicating the much greater proportion of local residents in the visitor pool. The core recreational catchment for the Wye Valley Woodlands SAC for residents of Monmouthshire (i.e. the zone within which 75% of Monmouthshire-resident visitors are found) is 7km, but it is important to remember that Monmouthshire residents make up a minority of visitors, with 71% of visitors living in other local authorities.

Implications for the Monmouthshire RLDP

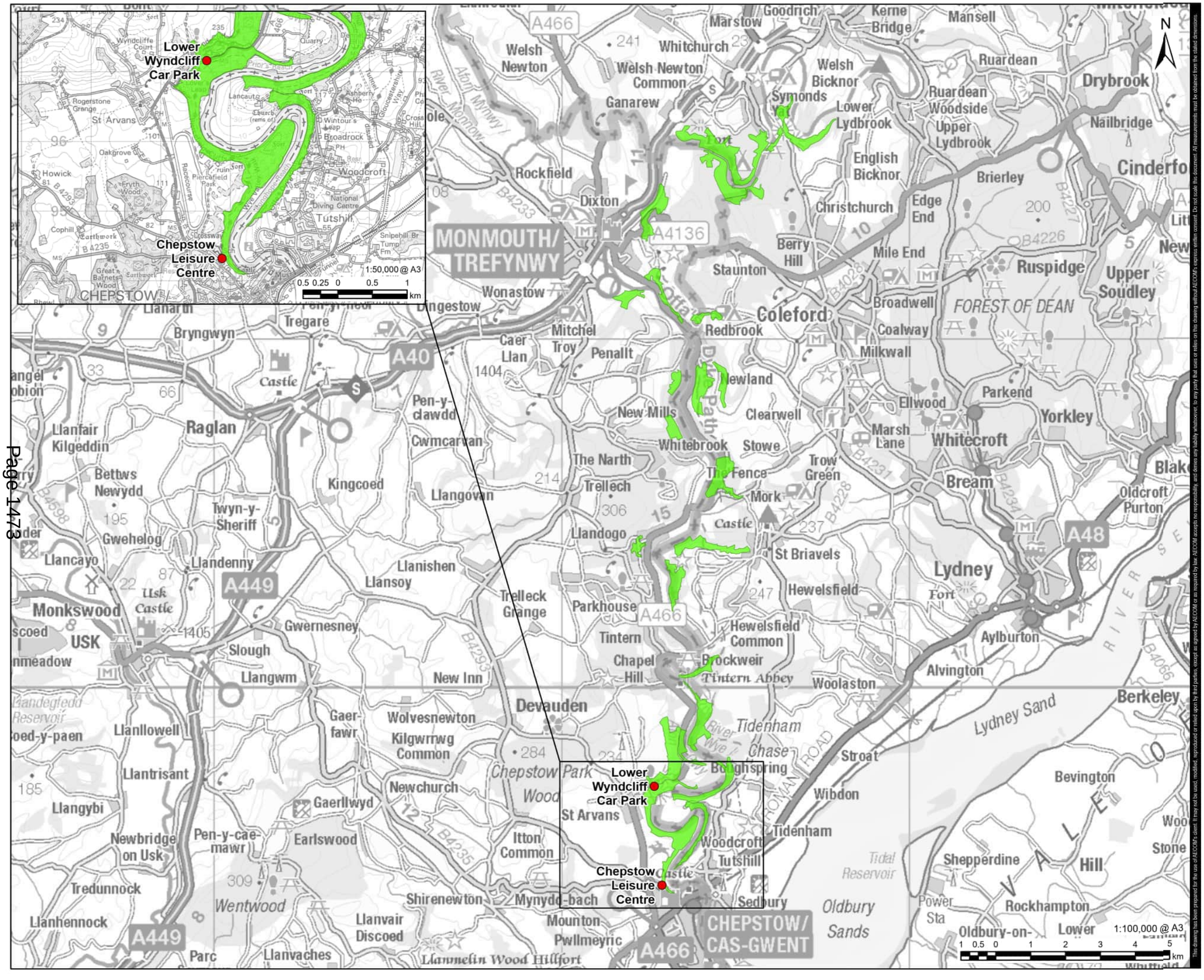
The data from the visitor survey presented here strongly suggest that:

- The visitor pressure in the Wye Valley Woodlands SAC is relatively low compared to other European sites. This is relevant given that, like most sites designated for their habitats, the SAC is more resilient to recreational pressure than a site harbouring easily disturbed/displaced interest features such as Severn Estuary SPA/Ramsar.
- The visitor profile is dominated by residents of other local authorities, some very far afield, who visit site infrequently (51% of survey respondents), possibly even just once given the high percentage who are on their first visit, but who stay on site for a considerable time (3-4 hours or more).
- A total of 71% of visitors derive from local authorities other than Monmouthshire, with only 29% of visitors being Monmouthshire residents.
- This visitor profile influences the core recreational catchment, yielding a very large core catchment of 39km. Even excluding holidaymakers, the SAC still has a large core catchment of 25km, indicating that some people travel a considerable distance from home to visit Wye Valley Woodlands SAC. For example, five visitors had travelled over 30km from home to visit the SAC, including one person from Swindon, located more than 60km away.
- The large distances travelled to visit the SAC do not apply to residents of Monmouthshire, who travel an average distance of 3km to visit the SAC, with 75% of Monmouthshire-based visitors living within 7km.

Given these data it is considered that visitor pressure within the SAC is limited, is a regional or national issue, and will not be heavily affected by housing and population growth within Monmouthshire. As such, no mitigation strategy for the Local Plan is required.

Appendix A Maps

Revision: 0 Drawn: AG Checked: LC Approved: JR Date: 2023-11-22



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PROJECT

Wye Valley Woodlands SAC

CLIENT

Monmouthshire County Council

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LEGEND

- Visitor Survey Location
- Wye Valley Woodlands Special Area of Conservation

NOTES

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ISSUE PURPOSE

FINAL

PROJECT NUMBER

60609986

FIGURE TITLE

Visitor Survey Locations for Wye Valley Woodlands SAC

FIGURE NUMBER

Figure 1

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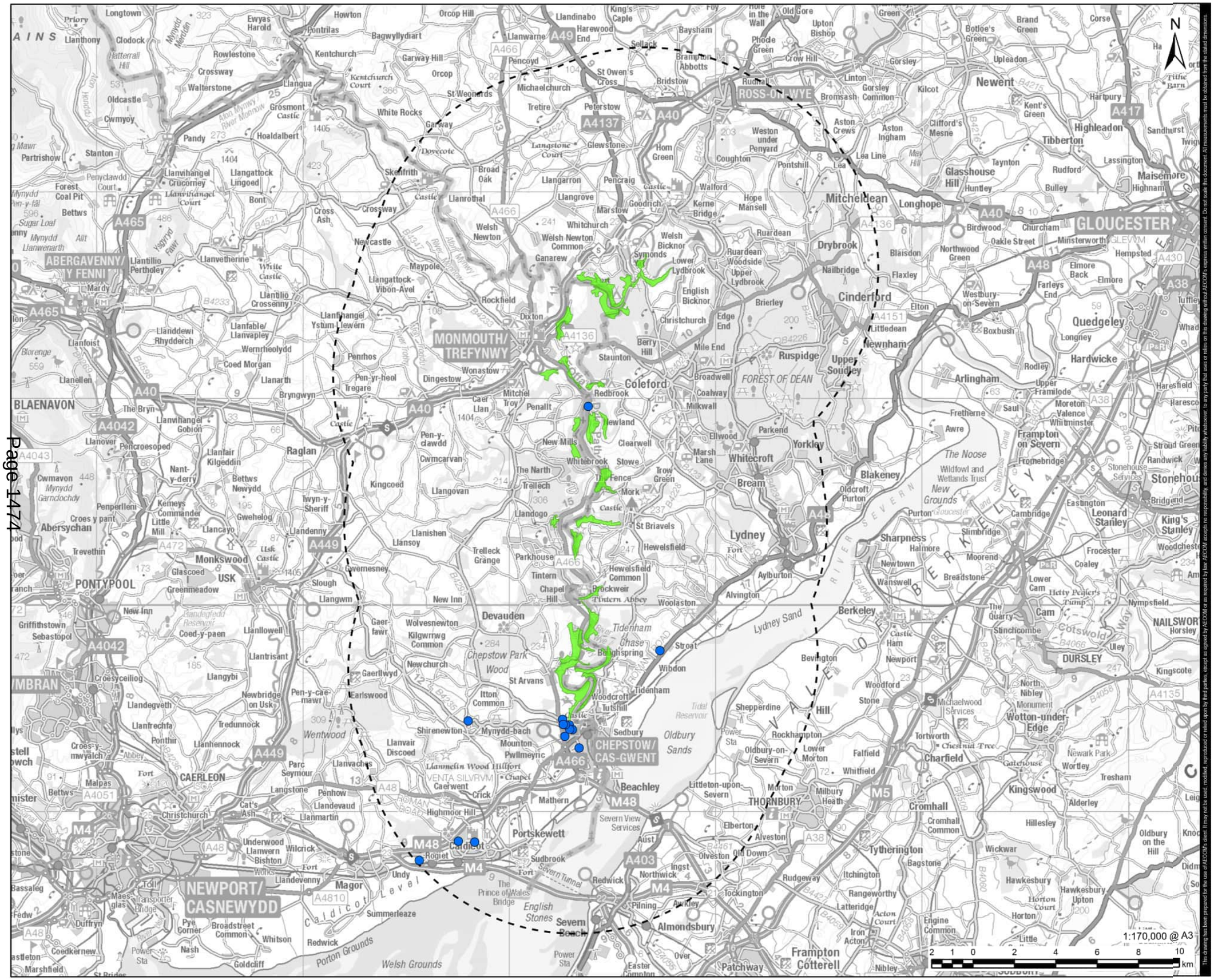

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LEGEND

- Visitor Postcode
- 10km Study Area
- Wye Valley Woodlands Special Area of Conservation

NOTES

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ISSUE PURPOSE

FINAL

PROJECT NUMBER

60609986

FIGURE TITLE

Home Postcodes of Wye Valley Woodlands SAC Survey Respondents That Live Within 10km of the SAC

FIGURE NUMBER

Figure 2

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Replacement Local Development Plan

2018-2033

Initial Consultation Report:
Preferred Strategy and Candidate Sites Register

October 2024

monmouthshire
sir fynwy

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Initial Consultation Report: Preferred Strategy and Candidate Site Register

1. Introduction

1.1. The Council is preparing a Replacement Local Development Plan (RLDP) for the County (excluding the area within Bannau Brycheiniog National Park), covering the period 2018 to 2033. The RLDP is a key Council policy document that allocates land for development, designates areas for protection and contains policies against which future planning applications will be assessed. When adopted, the RLDP will replace the existing adopted LDP as the statutory land use development plan for the County

1.2. The preparation of the RLDP involves a number of key stages, see figure 1, which includes a Delivery Agreement (Revised October 2024) setting out the timetable for Plan preparation and the Community Involvement Scheme (CIS)[1]. The CIS sets out how the Council proposes to proactively involve the community and stakeholders in the preparation of the RLDP in order that a range of views can be considered as part of the process of building a wide consensus on the Plan's strategy and policies.

1.3. This Initial Consultation Report sets out how we engaged with the community and stakeholders as part of the consultation and engagement on the Preferred Strategy[2] (December 2022) and Candidate Sites Register (CSR), which took place between 5th December 2022 and 30th January 2023. The structure of this report is as follows:

- Section 2 sets out the methods of engagement utilised at the Preferred Strategy stage, in accordance with the CIS, to ensure effective and efficient consultation and engagement, including how and who we consulted. The documents that were available for public consultation at this stage are also provided.
- Section 3 sets out the summaries of the key issues raised in relation to the Preferred Strategy consultation, along with the Council's consideration of these issues.
- Section 4 sets out the summaries of the key issues raised in relation to the Candidate Site Register consultation, along with the Council's considetation of these issues.

Figure 1: Key Stages of the RLDP Process

[1] For further information see Delivery Agreement (Revised October 2024)
[2] As required by LDP Regulation 16a

2. Methods of Engagement

2.1. Consultation and engagement on the RLDP Preferred Strategy took place between 5th December 2022 and 30th January 2023. During this period we invited the views of communities and stakeholders on the following:

- The Plan's key issues, challenges and opportunities for the County;
- The Plan's vision and objective that respond to the key issues, challenge and opportunities;
- The Plan's scale of future growth in homes and jobs and where this growth will be spatially located; and
- The preferred strategic site allocations and strategic policies to deliver/implement the Plan.

2.2. Alongside consultation on the Preferred Strategy, consultation also took place on the RLDP Candidate Site Register (CSR), which provides the location and basic site information of the sites submitted during the Second Call for Candidate Sites. This consultation allowed communities and interested parties to comment on the candidate sites within the register.

2.3. It should be noted that at the time of the CSR consultation, sites had undergone a high level assessment and as part of this assessment sites which did not meet the initial filtering assessment criteria[3] were 'filtered out' of the process. Of note, sites were filtered out due to an environmental phosphate constraint identified at the time, whereby sites within the Upper River Wye catchment, including those within the Primary Settlement of Monmouth were filtered out due to the lack of an identified strategic solution to the treatment of phosphates at the Monmouth Wastewater Treatment Works (WwTW) within the Plan period. Subsequently, however, Welsh Government's response letter to the 2022 Preferred Strategy advised that new site allocations should be made in Monmouth on the basis that sufficient certainty is provided by DCWW's planned improvements at the Monmouth Wastewater Treatment Works by 31st March 2025.

2.4. Consequently, in October 2023 Council agreed to the identification of a strategic site allocation in Monmouth. In addition, candidate sites within the Upper River Wye Valley catchment area that were previously filtered out have been reassessed as part of the Candidate Site Assessment process. As a result, the Candidate Site Register has been updated to reflect this change.

Consultation Documents

2.5. The consultation documents that were available for the Preferred Strategy and CSR Consultation are set out in Table 1. Paper copies of the Preferred Strategy, Preferred Strategy Summary, Preferred Strategy Easy Read, Candidate Sites Register, Initial Integrated Sustainability Appraisal Report and Habitats Regulations Assessment of the Preferred Strategy were available for public inspection at County Hall Usk, the Council's Community Hubs and public libraries. All documents in table 1 were available to view on the Planning Policy Website. The Preferred Strategy, including the Summary and Easy Read documents were available bilingually in Welsh.

[3] Compatibility with the Preferred Strategy, site size, fundamental constraints and submission of site viability evidence.

Table 1: Consultation Documents

Consultation Documents	
Key Stage	
Delivery Agreement	Delivery Agreement (Revised December 2022)
RLDP Evidence Base	RLDP Issues, Vision and Objectives (Updated December 2022)
	RLDP Growth and Spatial Options (September 2022)
	Sustainable Settlement Appraisal (Updated December 2022)
	Self-Assessment of the Preferred Strategy against the Test of Soundness (December 2022)
Preferred Strategy	Preferred Strategy (December 2022)
	Preferred Strategy Summary (December 2022)
	Preferred Strategy Easy Read and Animation (December 2022)
	Initial Integrated Sustainability Appraisal (ISA) Report (November 2022)
	Habitats Regulations Assessment (HRA) of the Preferred Strategy (November 2022)
Candidate Sites	Candidate Site Register (December 2022)
	Candidate Site Assessment Methodology (December 2022)
	Candidate Site High- level Assessment (December 2022)
Other Evidence	
Housing	Local Housing Market Assessment 2020-2025 (2020)
	Housing Background Paper (December 2022)
	Demographic Evidence Report (Updated November 2021)
	Gypsy and Traveller Accommodation Assessment (May 2016)
Natural Environment	Landscape Sensitivity Study Update (October 2020)
Economy	Economies of the Future: Economic Baseline Report (March 2018)
	Monmouthshire 2040: Economic Growth and Ambition Statement (November 2019)
	Inward Investment Prospectus 2020: Growing your business in Monmouthshire (March 2020)
	Regional Employment Study (March 2020)
	Employment Land Review (November 2022)
	Employment Land Background Paper (May 2022)

Renewable Energy	Renewable and Low Carbon Energy Assessment (October 2020)
Retail	Retail Background Paper (August 2022)
Minerals	Minerals Regional Technical Statement (September 2020)
Waste	The South East Wales Waste Planning Report (April 2016)

Consultation Engagement Methods

2.6. A number of engagement methods were utilised for the Preferred Strategy consultation to ensure a broad and effective reach out to different people within the community and that a range of views could be captured. The engagement methods that were undertaken are set out in table 2.

Table 2: Consultation Engagement Methods

Consultation Methods	
Members Workshops	**Date**
Members' Workshop (hosted by Place Scrutiny Committee) to brief Members of the RLDP process and allow for informal discussion.	2nd November 2022
Press Release	
Press Release to inform the general public of the intention to report the Preferred Strategy to Council 1st December 2022 and, if agreed, to consult on the Preferred Strategy between 5th December 2022- 30th January 2023. Emails were sent out to all on the RLDP database.	4th November 2022
Place Scrutiny Committee	
Place Scrutiny Committee, to formally scrutinise the Preferred Strategy before being presented at Council on 1st December	10th November 2022
Council	
Council endorsed the Preferred Strategy for statutory consultation for an 8-week period from 5th December 2022 – 30th January 2023. Council also agreed to consult on the CSR, ISA and HRA alongside the Preferred Strategy. The Revised Delivery Agreement was agreed by Council on 1st December 2022 and agreed with the Welsh Government on the 2nd December 2022. The Preferred Strategy, Easy Read Guide, Summary PS and animation, along with the Candidate Sites Register, Initial Integrated Sustainability Appraisal and Habitats Regulations Assessment were issued for statutory public	1st December 2022

consultation for an eight-week period between 5th December 2022 and 30th January 2023.	
Notification of the consultation on the Preferred Strategy and CSR Email consultation	
Notification of the consultation, inviting comments, was sent to the statutory and approx. 1,000 other consultees, agents, and individuals on the RLDP consultation data base. This includes statutory consultees, including the Welsh Government, Natural Resources Wales, all Town and Community Councils in Monmouthshire, and neighbouring Local Authorities..	Emails and letters sent 2nd December 2022
Public Information Exhibitions ('Drop-in' Sessions)	
Eight public information exhibitions ('drop-in' sessions) were held in various locations across the County. All exhibitions were held between 2pm to 7pm and were widely advertised via the easy read, posters, social media and the Planning Policy website. The exhibitions displayed information bilingually with large display boards, such as maps of the preferred strategic sites, together with and with paper copies of the Preferred Strategy and supporting evidence. Copies of the Easy Read were available to take away.. The exhibitions allowed the public and local residents to 'drop-in' within the advertised time to discuss the Preferred Strategy and any of the supporting information with a Planning Policy Officer. The Head of Planning and Planning Policy Manager attended each exhibition session and a minimum of two Planning Policy Officers were available at each of the eight exhibitions to explain the process and answer /clarify any queries.	• Abergavenny – Market Hall 12th December 2022 • Monmouth, Shire Hall 15th December 2022 • County Hall, Usk 19th December 2022 • Magor Baptist Church 11th January 2023 • Chepstow, Board School 12th January 2023 • Portskewett, Church Hall 17th January 2023 • Caldicot, Choir Hall 18th January 2023 • Raglan Village Hall 19th January 2023
Virtual Consultation Sessions	•
A virtual event for Town and Community Councils was held. This event presented information on the RLDP process, the implications of the Preferred Strategy and details of the how to respond to the consultation. We also invited members of the Town and Community Councils to disseminate this information to their communities and to raise awareness of the consultation.	6th December 2022
Two virtual events were held which were open to all. This was compèred by MCC Communications Team and facilitated members of the public to submit questions for the Head of Planning and Planning Policy Officers to answer. A presentation of the RLDP Process and Preferred Strategy was given and the animation played. Both events	8th December 2022, 6pm -7.30pm 10th January 2023, 2 pm - 3.30pm

were recorded and available to watch back on the Planning Policy website.	
Social Media	
Information regarding the Preferred Strategy and CSR was posed on various Social Media platforms, including via MCC X (Twitter) and MCC facebook accounts. Engagement also took place via the following: • Developer Forum meeting • A MCC department-wide officer meeting	Various posts between 5th December 2022 – 30th January 2023

Consultation Responses

2.7. Consultation responses to the Preferred Strategy and CSR were invited which could be submitted via Preferred Strategy and CSR representation forms. These were available as paper copies at the venues referenced in Table 2, and electronically. Electronic versions of the forms could be submitted directly via the Planning Policy website. The consultation questions for the Preferred Strategy were framed around specific questions designed to assist in ensuring that all key aspects of the Preferred Strategy were duly considered by respondents. The Preferred Strategy consultation questions and responses are set out in Section 3 below. The CSR form invited respondents to make comments in relation to specific candidate sites. The responses are grouped by the Candidate Site references, as set out in Section 4 below.

2.8. The consultation resulted in approximately 220 responses to the Preferred Strategy and 650 representations on the Candidate Sites register. The following sections of the report provide an overview of the main findings of the consultation exercise on the RLDP Preferred Strategy and CSR. This is not intended to be a comprehensive report on each comment received, rather a summary of the key issues raised in response to the specific questions in relation to the Preferred Strategy and specific sites in the CSR.

3. Preferred Strategy Summary of Representations

QUESTIONS ASKED DURING THE PREFERRED STRATEGY 2022 CONSULTATION

Question 1 – Do you have any comments on the key Issues, Vision and Objectives? 9

Question 2 – Do you have any comments on the Preferred Strategy? 26

Question 3 – Do you have any comments on Strategic Policy S1 – Growth Strategy? 35

Question 4 – Do you have any comments on Strategic Policy S2 Spatial Distribution of Development – Settlement Hierarchy? 43

Question 5 – Do you have any comments on Strategic Policy S3 Sustainable Placemaking & High Quality Design? 52

Question 6 – Do you have any comments on Strategic Policy S4 Climate Change? 55

Question 7 – Do you have any comments on Strategic Policy S5 Infrastructure Provision? 58

Question 8 – Do you have any comments on Strategic Policy S6 Affordable Homes? 64

Question 9 – Do you have any comments on Strategic Policy S7 Preferred Strategic Site allocation? 70

Question 10 – Do you have any comments on Strategic Policy S7 Preferred Strategic Site Allocation: a) Abergavenny East? 80

Question 11 – Do you have any comments on Strategic Policy S7 Preferred Strategic Site allocation b) Bayfield Chepstow? 83

Question 12 – Do you have any comments on Strategic Policy S7 Preferred Strategic Site Allocations: c) Caldicot East? 95

Question 13 – Do you have any comments on Strategic Policy S8 Gypsy and Travellers? 99

Question 14 – Do you have any comments on Strategic Policy S9 Sustainable Transport? 99

Question 15 – Do you have any comments on Strategic Policy S10 Town, Local and Neighbourhood Centres? 106

Question 16 – Do you have any comments on Strategic Policy S11 Community and Recreation Facilities? 109

Question 17 – Do you have any comments on Strategic Policy S12 – Employment Sites Provision 111

Question 18 – Do you have any comments on Strategic Policy S13 Rural Enterprise? 114

Question 19– Do you have any comments on Strategic Policy S14 Visitor Economy? 116

Question 20 – Do you have any comments on Strategic Policy S15 – Sustainable Waste Management? 118

Question 21 – Do you have any comments on Strategic Policy S16 – Minerals? 118

Question 22 – Do you have any comments on Strategic Policy S17 Green Infrastructure, Landscape and Nature Conservation? 120

Question 23 – Do you agree with the recommendations with regard to the existing Adopted LDP Development Management Policies? 124

Question 24 – Do you have any other comments on the Preferred Strategy? 128

Question 25 – We would like to know your views on the effects that the proposals would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated? 134

Question 26 – Please also explain how you believe the proposals could be improved so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language? 136

Question 27 – Do you have any comments on the Initial Integrated Sustainability Appraisal Report? 137

Question 28 – Do you have any comments on the Habitats Regulations Assessment (HRA)? 143

Question 1 – Do you have any comments on the key Issues, Vision and Objectives?

89 organisations or members of the public submitted a response to question 1.
The responses were varied, many organisations and private individuals provided overall support for the issues, vision and objectives. Others wish to see changes to wording and some questioned how the objectives would be measured.
A number of area specific comments were made both supportive and of concern, particularly in relation to those areas where strategic sites are proposed.

Key Theme	Summary of Points Raised
General support	• Welcome the Preferred Strategy in particular the recognition of need for additional housing in Chepstow as so many families are in housing need [Chepstow Town Council]. • Provide general support, particularly through recognition of the challenge of the need for affordable housing and therefore reason for the high housing growth proposed [Torfaen County Borough Council]. • Note the Vision is clear and agree the objectives are sufficiently aspirational yet achievable within a spatial planning context [Llanover Estates, Leathdunn Ltd., Johnsey Estates UK, Johnsey Estates 2020 Ltd, Vistry Group, The Coldbrook Estate & Private individual x 1]. • Support the Vision and Objectives but believe a greater proportion of development should be directed towards the main rural settlements [Monmouthshire Housing Association]. • Accept the Objectives are sufficiently aspirational yet achievable to varying degrees [Abergavenny & District Civic Society]. • Support and agree with statement in paragraph 3.2 [Natural Resources Wales]. • Generally support the principle of the vision, in particular the aim to distribute growth to sustainable communities such as Usk. However note it is imperative that this is translated into policies [Private individual x 1]. • Generally support the principle of the vision, in particular the aim to distribute growth to existing rural communities such as Shirenewton, helping them become resilient with modest growth supporting local services and facilities and more housing choice including affordable to encourage younger populations to remain in communities they grew up in [Private individual x 1]. • Key objectives set out within the vision are supported [Hallam Land Management]. • Consider the relevant core issues have been identified [Redrow Homes]. • Suggest the vision, issues and objectives are fairly generic and uncontentious in nature [Barratt & David Wilson Homes South Wales, Candleston Homes, Taylor Wimpey PLC & Private individual x 1]. • Note it is demonstrated that the PS has been underpinned by the five ways of working set out in the Wellbeing of Future Generations Act (WBFGA) which will form and important part of evidencing that the RLDP is sound. Acknowledge and support the key issues, challenges and opportunities [Redrow Homes Limited]. • Support the key issues, challenges & opportunities and note the vision and objectives comply and integrate with the WBFGA [Edenstone Group, Barwood Development Securities Limited & Edenstone]. • Support the vision and objectives [Mathern Community Council & Private individual x 1]. • Note it is encouraging to see mention of active travel, green infrastructure, local food production, Monmouthshire's unique landscape, tourism potential and the need to improve water quality in rivers [Private individual x 1]. • Agree with the high level vision and broadly agree with the objectives [Private individual x 1]. • Comprehensive strategy, support all 17 objectives [Private individual x 1].

LPA Response	Support for the Issues, Vision and Objectives is welcomed and noted.
LPA Recommendation	No change required.
Key issues, challenges and opportunities	• Welcome reference in paragraph 3.6 noting there is a limited supply of previously developed land along with paragraph 3.7 noting it is not possible to avoid allocating land that is best and most versatile [Barratt & David Wilson Homes, Barratt & David Wilson Homes South Wales, Richborough Estates, Candleston Homes & Taylor Wimpey PLC]. • Suggest a full carbon footprint of the County Is needed to inform where maximum carbon reductions should be focussed, refer to remaining within 1.5oC suggesting this is too vague [Abergavenny Transition Town]. • Refer to the summary of key issues, suggest 'appropriate growth sectors' needs defining particularly given the climate emergency [Abergavenny Transition Town]. • Question what 'opportunities associated with growth from both the Cardiff Capital Region and Bristol Region' are, suggest recent examples be provided [Abergavenny Transition Town]. • Note rural isolation/sustaining rural communities/regenerating the rural economy are highlighted but no hint of what might lead to tackling these things other than diversification and tourism [Abergavenny Transition Town]. • Refer to the protection of landscapes and heritage noting more radical interventions are required if rural isolation/sustaining rural communities and regenerating the rural economy are going to happen [Abergavenny Transition Town]. • Regarding Tourism note nothing is mentioned about the seasonal and potential low-pay of this sector leading to inability to afford local accommodation, nor mention of impacts of second homes and Air BnB lettings in formally stable rural communities [Abergavenny Transition Town]. • Suggest the causes of phosphate pollution should be specified to allow policy to focus on the dominant causes [Abergavenny Transition Town]. • Refer to digital connectivity and note it would be useful to have statistics on the current roll out of high-speed fibre broadband and timescale for full coverage [Abergavenny Transition Town]. • Suggest nature emergency could be better addressed, noting differences should be recognised between land use and land management and by providing detail of the proposed actions that would be implemented through the policy framework [Natural Resources Wales]. • Do not feel the five aspects of ecosystem resilience as set out in the Environmental (Wales) Act 2016 are addressed in the RLDP, suggest this legislation and the South East Area Statement should be referenced in this section [Natural Resources Wales]. • Acknowledge reference to phosphates throughout but wish to highlight there are significant pre-existing pressures on the public sewer network across the County, the RLDP should not exacerbate these pressures [Natural Resources Wales]. • Wider water network failures should be listed as well as phosphates to ensure proposed growth doesn't exacerbate this problem [Natural Resources Wales]. • Acknowledge changes to issues relating to biodiversity and also invasive non-native species [Natural Resources Wales]. • Key opportunities should also include the Nature Recovery Plan [Natural Resources Wales]. • State a number of the points are interlinked and must be considered holistically to ensure an appropriate policy response, such as demographic issues, high house prices, affordability, increasing need for affordable housing & opportunities for growth from both the Cardiff Capital and Bristol regions [Richborough Estates]. • Concern over statement relating to an older population reducing the number of people using and financially supporting businesses and services. Suggest some parts of Monmouthshire are well known to attract retired people [Private individuals x 2].

	• Refer to loss of agricultural land referred to in paragraph 3.7, suggest measures need to be put in place to ensure developers don't buy up land, holding it as potential investment without using it in the meantime [Private individual x 1]. • Refer to paragraph 3.13 stating in addition to green spaces, footpaths and cycleways are needed to connect residential areas with the Monmouthshire countryside [Private individual x 1]. • Refer to the elderly noting they want to be part of an elderly community and that retirement villages should therefore be included in the RLDP, suggest their needs have not been considered in the issues, vision and objectives [Private individual x 1]. • State the plan should be for the current Welsh population and should not be catering for Bristolians that are looking for cheaper housing [Private individual x 1]. • Disagree the RLDP recognises the value and importance of placemaking and the provision of locally accessible/open spaces for health and wellbeing and recreation as green spaces are being built on [Private individual x 1]. • State there is no detail in paragraph 3.1 on how empty affordable housing is being dealt with, state this opportunity should be included and prioritised to utilise existing building stock and reduce carbon emissions inherent to building new [Cllr Christopher Edwards & Private individual x 1]. • Consider there is no overriding mandate by Welsh Government to resolve a demographic imbalance by aiming for high growth [Cllr Christopher Edwards & Private individual x 1]. • Suggest the response to climate and nature emergencies while promoting recovery is ignorant of guidance from Welsh Government to restrain growth in rural areas in order to protect the natural environment [Cllr Christopher Edwards & Private individual x 1]. • State there is no evidence to give confidence that the County's growth and location of growth will not continue to drive high levels of out-commuting [Cllr Christopher Edwards & Private individual x 1]. • Suggest the strategy is confused in that placemaking, active travel and environmental considerations are key sustainability principles to be achieved but the ambition is being undermined due to level of growth put forward in the Strategy [Cllr Christopher Edwards & Private individual x 1]. • State the high prevalence of best and most versatile land noted in paragraph 3.1 is one of the reasons why national growth in Wales has been directed elsewhere and that Monmouthshire should instead retain its rural character [Cllr Christopher Edwards & Private individual x 1]. • While recognise it is mentioned elsewhere state there is no mention of requirements to support and maintain nature/diversity within new housing developments, state this is a challenge locally and nationally [Private individual x 1]. • Refer to paragraph 3.7 state the priority and presumption should be to preserve and use the land to feed people now and in the future, suggest instead the statement leans towards granting permission to build on BMV [Private individual x 1]. • Note the key issues, vision and objectives are aspirational but vague, comment that to a degree this is unavoidable as seeks to set out a general picture [Usk Civic Society]. • Refer to phosphates, welcome that MCC are working with statutory bodies to find solutions to enable growth and allocate sites that do not harm the environmental capacity of Monmouthshire's watercourses [Vistry Group, The Coldbrook Estate & Private individual x 1]. • Welcome reference that all of the main towns are outside the Future Wales green belt [Candleston Homes & Taylor Wimpey PLC]. • Advocate the promotion of the role of rural land for employment opportunities with close connection with key defined urban settlements, suggest this would ease new development by re-use of previously developed land which accords with the principle of making efficient use of the land [Private individual x 1]. • Suggest there is an underlying assumption that all rural settlements are in need of housing development to become vibrant places, suggest the lack of development to date indicates insurmountable infrastructure deficiencies [Private individual x 1]. • State no mention of transport infrastructure as a key issue, particular concern in relation to Chepstow [Private individual x 1]. • Commend the key issues, vision and objectives but question how they will be implemented [Private individual x 1].

LPA Response	Minor updates have been made to the Key Issues, Challenges and Opportunities where relevant in response to some of the comments noted above to provide further clarity and also to account for factual changes such as updated Census data, the Local Housing Market Assessment Refresh and the Tourism STEAM report.
LPA Recommendation	Minor updates have been made to the Key Issues, Challenges and Opportunities. A summary of the key issues, challenges and opportunities are included in the Deposit RLDP. The updated Issues are included in full as an Appendix to the RLDP and also are set out in the Issues, Vision and Objectives Paper (updated September 2024).
RLDP Vision	• Suggest vision has not changed following change to Preferred Strategy other than last paragraph, suggest this appears to be an add on [Home Builders Federation]. • Provide comments to suggest a key element of the strategy should be to encourage vibrant, active and self-contained communities with a mixture of age groups, activities and land uses in line with PPW11. Also suggest the vision should include reference to the agricultural core of the County, and addressing constrained infrastructure that will require investment to achieve the overarching ambitions [Melin Homes, Llanarth Estates, Tirion Homes, Candleston Homes, Sero Homes, Sero & Private individuals x 2]. • State vision is acceptable but clear definition of net zero carbon ready is required [Abergavenny & District Civic Society]. • Suggest criterion 4) of the vision cannot be taken seriously until there is a full understanding of the County's full carbon footprint [Abergavenny Transition Town]. • Applaud parts of the statement that state 'Monmouthshire will be home to well-connected exemplar, affordable housing-led, net zero carbon ready places' and that affordable homes will be delivered 'at pace and at scale while also responding to the nature and climate emergency'. Note however that they have concerns these homes will be truly affordable [Abergavenny Transition Town]. • While broadly support the vision suggest it is inaccurate to say that by 2033 Monmouthshire will be affordable housing-led, suggest it is more a 70:30 ratio. Note the statement does not acknowledge the important role market housing has in delivering new communities. Suggest the vision is amended to omit this reference and instead add in 'a balanced mix of market and affordable housing' [Vistry]. • Suggest there is an opportunity for specific reference to be made to ensuring that sufficient housing is delivered to meet both forecast requirements and address the existing shortfall [Barratt & David Wilson Homes South Wales]. • Recommend amending the wording in the final paragraph of the vision to 'by 2023 Monmouthshire will be home to exemplar places that are well-connected, net zero carbon ready and provide essential affordable homes, and support socially and economically sustainable and resilient communities for all' [Richborough Estates]. • State the Council has a poor record of delivering or enabling delivery of homes at scale or pace, suggest it is commendable to raise the quality of homes but suggest the policy will be undeliverable [Cllr Christopher Edwards & Private individual x 1]. • Refer to the current adopted LDP suggests the vision and objectives are more appropriate than the PS, concern of overdevelopment in southern part of County and increase commuting [Cllr Louise Brown]. • Welcome recognition of need to address protection of environmental qualities, improve access to and facilities within town centres such as Chepstow, provide more affordable housing and address issues of water quality and wider environmental degradation [The Chepstow Society]. • Suggest there is perhaps opportunity in the vision for specific reference to be made to ensuring sufficient housing is delivered to meet both forecast requirements and to address existing shortfall [Candleston Homes & Taylor Wimpey PLC]. • Support vision, suggest it affords policy support specifically for brownfield sites in the countryside that can unlock employment opportunities where they enhance connection between both urban and rural communities [Private individual x 1].

	• Suggest the vision would be of detriment to the countryside and due to lack of infrastructure result in further negative impact [Private individuals x 3].
LPA Response	Amend the Vision as appropriate.
LPA Recommendation	Appropriate amendments to the Vision have been made as a result of some of the consultation responses. The vision has been streamlined to avoid duplication and repetition.
Objective 1 (Economic Growth/ Employment)	• Given the role of agriculture and related employment opportunities believe specific reference should be made in supporting the rural economy [Melin Homes, Llanarth Estates, Tirion Homes, Candleston Homes, Sero Homes, Sero & Private individuals x 2]. • Objective 1 would benefit from an emphasis on the circular economy and 'green' and/or 'clean' growth [Abergavenny & District Civic Society]. • State 'economic growth' should be replaced with 'aiming for a circular economy' and a definition of 'appropriate sectors' of employment should be provided [Abergavenny Transition Town]. • Note it is key to acknowledge changing working patterns and situations where sites currently cater for an employment use that are no longer fit for purpose and therefore more suitable for residential or mixed-use flexible spaces [Private individual x 1]. • Suggest reference should be made to the increased role that home and agile working can be expected to make over the plan period, note it should seek to encourage/facilitate the increased propensity for home/agile working, alongside the need to bring forward 'traditional' business spaces [Richborough Estates]. • Little indication on how this objective will be turned into a reality [Usk Civic Society]. • Support objective [Private individual x 1].
LPA Response	Objective 1 is considered appropriate and reflects the issues the Plan is seeking to address. However, there has been one minor amendment to reflect comments above, to ensure there is no ambiguity 'appropriate growth sectors' has been removed from the objective. No other changes considered necessary. Further details relating to Economic Growth and Employment are included within the wider RLDP and detailed policy framework of the Deposit Plan. All objectives have been updated to include the relevant Gwent Public Service Board Well-being Plan Steps and the Community and Corporate Plan Objectives.
LPA Recommendation	Minor update has been made to Objective 1; no other changes are considered necessary. Wider update for all objectives to include the relevant Gwent Public Service Board Well-being Plan Steps and the Community and Corporate Plan Objectives.
Objective 2 (Town and Local Centres)	• Suggest consideration must be given to small scale agricultural and food industries and how they can be given a genuine platform to operate successfully in local markets as well as alongside larger retail centres and supermarkets, reducing food miles and giving confidence in food supplies [Melin Homes, Llanarth Estates, Tirion Homes, Candleston Homes, Sero Homes, Sero & Private individuals x 2]. • Agree with Objective [Abergavenny Transition Town]. • Welcome that Objective 2 recognises Abergavenny as a County town and seeks to sustain and enhance its role by seeking to direct development and investment [Johnsey Estates UK & The Coldbrook Estate]. • Support reference to three local centres including Raglan, the RLDP must help sustain and enhance these centres by directing a sufficient level of growth to settlements such as Raglan [Richborough Estates].
LPA Response	Objective 2 is considered appropriate and reflects the issues the Plan is seeking to address. However, there has been one minor factual amendment to bring the objective in line with the updated references made in the Town, Local and Neighbourhood Centres Strategic Policy. No other changes considered necessary. Further details relating to Town, Local and Neighbourhood Centres are included within the wider RLDP and detailed policy

	framework of the Deposit Plan. All objectives have been updated to include the relevant Gwent Public Service Board Well-being Plan Steps and the Community and Corporate Plan Objectives.
LPA Recommendation	Minor factual update has been made to Objective 2, with no further changes necessary. Wider update for all objectives to include the relevant Gwent Public Service Board Well-being Plan Steps and the Community and Corporate Plan Objectives.
Objective 3 (Green Infrastructure, Biodiversity and Landscape)	• Should ensure it is demonstrated how new developments provide biodiversity benefits, greenfield sites provide significant opportunity for biodiversity gain to be made [Melin Homes, Llanarth Estates, Tirion Homes, Candleston Homes, Sero Homes, Sero & Private individuals x 2]. • No mention within objective of dramatic changes in use of the agricultural landscape over the next decade and how policy will need to adjust to those [Abergavenny Transition Town]. • Acknowledge the inclusion of 'ecosystem resilience' within this objective, note building connectivity and linkages should be thought about in an evidence based strategic way, state this objective must inform the strategic growth locations and allocated sites [Natural Resources Wales]. • State this objective is well defined and will help to ensure climate change and nature emergencies are effectively recognised and actioned [Private individual x 1].
LPA Response	Objective 3 is considered appropriate and reflects the issues the Plan is seeking to address. However, there has been one minor factual update to account for the change of name to the Wye Valley National Landscape (AONB). No other changes considered necessary. Further details relating to Green Infrastructure, Biodiversity and Landscape are included within the wider RLDP and detailed policy framework of the Deposit Plan. All objectives have been updated to include the relevant Gwent Public Service Board Well-being Plan Steps and the Community and Corporate Plan Objectives.
LPA Recommendation	Minor factual update has been made to Objective 3, with no further changes necessary. Wider update for all objectives to include the relevant Gwent Public Service Board Well-being Plan Steps and the Community and Corporate Plan Objectives.
Objective 4 (Flood risk)	• Welcome inclusion of objective [Dwr Cymru/Welsh Water]. • Suggest control measures need to mention poor winter farming practices of leaving fields exposed with no cover crops exacerbating storm water run-off [Abergavenny Transition Town]. • Acknowledge the reference to natural flood management within this objective [Natural Resources Wales]. • State this is not being taken seriously by the removal of policy which provides a local reminder that there is a need to comply with TAN15 [Cllr Louise Brown].
LPA Response	Objective 4 is considered appropriate and reflects the issues the Plan is seeking to address. Further details relating to Flood Risk are included within the wider RLDP and detailed policy framework of the Deposit Plan. All objectives have been updated to include the relevant Gwent Public Service Board Well-being Plan Steps and the Community and Corporate Plan Objectives.
LPA Recommendation	No change required. Wider update for all objectives to include the relevant Gwent Public Service Board Well-being Plan Steps and the Community and Corporate Plan Objectives.
Objective 5 (Minerals and Waste)	• Suggest should discourage carbon intensive consumption generally and encourage re-use, repair, refill and recycle [Abergavenny Transition Town]. • Reference to waste reduction in Objective 7 should be included in Objective 5 [Abergavenny Transition Town].

LPA Response	Objective 5 is considered appropriate and reflects the issues the Plan is seeking to address. Further details relating to Minerals and Waste are included within the wider RLDP and detailed policy framework of the Deposit Plan. All objectives have been updated to include the relevant Gwent Public Service Board Well-being Plan Steps and the Community and Corporate Plan Objectives.
LPA Recommendation	No change required. Wider update for all objectives to include the relevant Gwent Public Service Board Well-being Plan Steps and the Community and Corporate Plan Objectives.
Objective 6 (Land)	• Note in losing a small amount of higher-grade agricultural land it may bring wider benefits to the agricultural sector as a whole [Melin Homes, Llanarth Estates, Tirion Homes, Candleston Homes, Sero Homes, Sero & Private individuals x 2]. • Suggest reference should also be made to the future 'efficient use' of agricultural land to account for increase of local food production [Abergavenny Transition Town]. • Welcome recognition that whilst BMV should be protected it is not always possible in a County like Monmouthshire, provides important context for the search sequence that must be followed in identifying new housing allocations [Richborough Estates]. • Recognise that this aligns with the search sequence set out in PPW but state caution should be taken to ensure that there is not an overreliance on brownfield sites, as they are slower to develop and will be unlikely to meet the RLDP requirement to deliver 50% affordable housing in all cases [Edenstone Group & Edenstone]. • Suggest the first two points state ambition but immediately create a reason not to meet it and are therefore considered weak policy points [Cllr Christopher Edwards & Private individual x 1]. • Refer to PPW11 and suggest that the approach to using BMV land is contrary to this. Concern there are no policies relating to allotment provision in all housing developments or use of Council owned land to be used for farming and food production [Cllr Louise Brown]. • Support objective as it maximises the opportunities for redevelopment of brownfield sites [Private individual x 1]. • Suggest efficient use of land must also address what is happening on the agricultural land and address local food production, carbon sequestration, restoration of biodiversity, flood risk management, water quality, reversing rural depopulation, tackling isolation and poverty, training and job creation, health, food security and the foundational economy. The RLDP should promote the creation of small farms with farmhouses. Suggest this could be done through housing cooperatives to avoid them being sold off. Promote need for small farms to enable local young people to start farming, state this is particularly needed on Council farms [Our Food 1200].
LPA Response	Objective 6 is considered appropriate and reflects the issues the Plan is seeking to address. Further details relating to Best and Most Versatile Land (including site search sequence), Allotments and Community Food Growing are included within the wider RLDP and detailed policy framework of the Deposit Plan. All objectives have been updated to include the relevant Gwent Public Service Board Well-being Plan Steps and the Community and Corporate Plan Objectives.
LPA Recommendation	No change required. Wider update for all objectives to include the relevant Gwent Public Service Board Well-being Plan Steps and the Community and Corporate Plan Objectives.
Objective 7 (Natural resources)	• Welcome the sentiment of objective [Dwr Cymru/Welsh Water]. • Suggest the RLDP should commit to new development being net carbon zero and should only consider such sites for inclusion [Melin Homes, Llanarth Estates, Tirion Homes, Candleston Homes, Sero Homes, Sero & Private individuals x 2]. • Recommend this objective is strengthened by replacing 'promote' with 'ensure' given the detail in the SE Area Statement, noting it links with the theme of 'Climate Ready Gwent' and should therefore deliver a bold policy response by ensuring new development in the County implement measures to meet the objective [Natural Resources Wales].

LPA Response	Objective 7 is considered appropriate and reflects the issues the Plan is seeking to address. The Council's approach to net zero carbon requirements is included within the wider RLDP and detailed policy framework of the Deposit Plan. The wording of this objective has been updated in line with the comments made and amended to 'ensure' to align with the SE Area Statement. All objectives have been updated to include the relevant Gwent Public Service Board Well-being Plan Steps and the Community and Corporate Plan Objectives.
LPA Recommendation	Minor update has been made to Objective 7 in line with comments made. Wider update for all objectives to include the relevant Gwent Public Service Board Well-being Plan Steps and the Community and Corporate Plan Objectives.
Objective 8 (Health and Well-being)	• Suggest there is a lack of provision of recreation and sports facilities particularly for the younger generation in Abergavenny. Recommend this matter be included [Abergavenny Transition Town]. • State this objective is well defined and will help to ensure climate change and nature emergencies are effectively recognised and actioned [Private individual x 1].
LPA Response	Objective 8 is considered appropriate and reflects the issues the Plan is seeking to address. Support for and provision of recreation and open space facilities is included within the wider RLDP and detailed policy framework of the Deposit Plan. All objectives have been updated to include the relevant Gwent Public Service Board Well-being Plan Steps and the Community and Corporate Plan Objectives.
LPA Recommendation	No change required. Wider update for all objectives to include the relevant Gwent Public Service Board Well-being Plan Steps and the Community and Corporate Plan Objectives.
Objective 9 (Demography)	• State the reference to providing opportunities of housing and employment for young people is not evidenced and is largely aspirational [Abergavenny Town Council]. • Note the impacts of lower levels of growth have previously been considered by the Council, suggest it is difficult to address these matters at levels below the previous version of the Preferred Strategy [Melin Homes, Llanarth Estates, Tirion Homes, Candleston Homes, Sero Homes, Sero & Private individuals x 2]. • Suggest adding 'through increasing considerably, state-led third sector public housing provision, rather than relying on market-led development' [Abergavenny Transition Town]. • State the policies must create a more balanced demography and social and economically sustainable communities if the issues are to be addressed [Richborough Estates]. • Refer to objective 9 stating this will not be achieved as rural areas have more older populations than younger, state comparison with Cardiff is false as it has a university population [Cllr Louise Brown]. • Suggest MCC have little influence in reality over who will live in the new housing stock, it may be just as attractive to downsizing retirees as young families [Usk Civic Society]. • Note this is an admirable ambition but should be more focus on retaining than attracting younger residents, many who plan to continue working in Bristol [Private individuals x 2].
LPA Response	Objective 9 is considered appropriate and reflects the issues the Plan is seeking to address. Addressing the core issues of housing affordability and rebalancing the demography of the County continue to be key priorities of the Deposit Plan, along with the climate and nature emergency and economic prosperity. This is appropriately reflected in the Deposit Plan's policy framework which includes a policy approach to ensure allocated residential sites provide 50% affordable housing and a housing mix policy to encourage a better mix of house types, tenure and size to help address demographic and affordability challenges facing the County. All objectives have been updated to include the relevant Gwent Public Service Board Well-being Plan Steps and the Community and Corporate Plan Objectives.

LPA Recommendation	No change required. Wider update for all objectives to include the relevant Gwent Public Service Board Well-being Plan Steps and the Community and Corporate Plan Objectives.
Objective 10 (Housing)	• Question why there is no reference to meeting net zero carbon for all new developments [Abergavenny Town Council]. • Objective 10 should include reference to the wider need for housing not just affordable [Home Builders Federation & Abergavenny & District Civic Society]. • State 'Exemplar' should be removed from wording and replaced with 'good quality' instead as this is considered a constraint that could slow down delivery of the plan [Home Builders Federation]. • Suggest it should be an objective to link housing directly to employment and addressing shortfall and lack of affordability together [Melin Homes, Llanarth Estates, Tirion Homes, Candleston Homes, Sero Homes, Sero & Private individuals x 2]. • Concern over viability of 50% affordable housing as has not been achieved previously [Abergavenny Transition Town]. • Suggest this objective does not acknowledge the need for market housing or the important role this plays in addressing affordability issues suggest it is amended to include 'market homes'. Fails to recognise market housing is a lead delivery agent of affordable and low cost homes [Vistry & Redrow Homes]. • Suggest the provision of 50% on site should be revisited stating it is not achievable in the spatial planning context and will lead to a failure in the plan as allocations are not likely to be viable based on the Plan requirements [Redrow Homes]. • Support importance of providing new affordable housing, note delivering sufficient housing growth both affordable and market will be critical if other objectives identified in the plan are to be achieved [Richborough Estates]. • Refer to use of 'urgently' stating this is not usual policy language and creates a lever for inappropriate development to be pushed through. Concern over use of 'exemplar' questions how this will be enforced [Cllr Christopher Edwards & Private individual x 1]. • Refer to objective 10 stating this will not be achieved as not likely to receive sufficient subsidy from Welsh Government to ensure the provision of 50% affordable housing [Cllr Louise Brown]. • Affordable housing is rightly identified as a key issue for the County, concern developers may argue viability following allocation to reduce percentage of affordable housing and planning obligations [Tompkins Thomas Planning]. • State building affordable homes is an excellent idea but do not think that continuing to build 3, 4 and 5 bedroom market homes is, suggest instead should concentrate on single storey homes/bungalows to allow downsizing to open up the market [Private individuals x 4]. • Refers to Objective 10 suggesting this recognises the need to provide for a level of housing sufficient to enable a wide-ranging choice of homes both for existing and future residents and supports the need for new homes in Monmouth [Edenstone].
LPA Response	Objective 10 is considered appropriate and reflects the issues the Plan is seeking to address. Further details relating to Housing are included within the wider RLDP and detailed policy framework of the Deposit Plan. Delivery of affordable housing continues to be a core priority of the RLDP. Viability testing has been undertaken on all of the proposed site allocations in the Deposit RLDP. This assessment has been undertaken independently by a viability consultant on behalf of Monmouthshire County Council, viability assessments have demonstrated that the proposed site allocations are viable based on the provision of 50% affordable housing. Different affordable housing thresholds are provided for other types of development and are set out in Strategic Policy S7. The delivery of exemplar places is a Council ambition. New housing developments in both urban and rural areas should incorporate a mix of market and affordable house types, tenures and sizes to cater for the range of identified housing needs and contribute to the development of balanced communities. This approach is reflected in a specific housing mix policy within the RLDP. The affordable housing requirements in S7 must, however, be adhered to.

	The core issues of housing affordability and rebalancing the demography of the County continue to be the focus of the Deposit Plan, along with the climate and nature emergency and economic prosperity. A housing mix policy is included in the plan to encourage a better mix of house types, tenure and size to help address demographic and affordability challenges facing the County. All objectives have been updated to include the relevant Gwent Public Service Board Well-being Plan Steps and the Community and Corporate Plan Objectives.
LPA Recommendation	No change required. Wider update for all objectives to include the relevant Gwent Public Service Board Well-being Plan Steps and the Community and Corporate Plan Objectives.
Objective 11 (Placemaking)	• Refer to Objective 11 and note 'exemplar' should be removed from wording and replaced with 'good quality' instead as this is considered a constraint that could slow down delivery of the plan [Home Builders Federation]. • Suggest this largely repeats Objective 10 [Abergavenny Transition Town]. • Suggest this is very subjective with aims open to developer spin and influence. Suggest language is more focussed on measurable characteristics [Cllr Christopher Edwards & Private individual x 1]. • Support objective [Edenstone].
LPA Response	Objective 11 is considered appropriate and reflects the issues the Plan is seeking to address. The delivery of exemplar places is a Council ambition. Further details relating to Placemaking are included within the wider RLDP and detailed policy framework of the Deposit Plan. All objectives have been updated to include the relevant Gwent Public Service Board Well-being Plan Steps and the Community and Corporate Plan Objectives.
LPA Recommendation	No change required. Wider update for all objectives to include the relevant Gwent Public Service Board Well-being Plan Steps and the Community and Corporate Plan Objectives.
Objective 12 (Communities)	• Welcome and support objective 12 [Theatres Trust]. • Suggest this should be reworded to 'urban communities' as there is already an objective specifically for 'rural communities' and they cannot have good access by active travel [Abergavenny Transition Town]. • Note this will be reliant on delivering sufficient levels of growth capable of sustaining and enhancing the most sustainable settlements [Richborough Estates]. • Refers to Objective 12 suggesting this recognises the need to provide for a level of housing sufficient to enable a wide-ranging choice of homes both for existing and future residents and supports the need for new homes in Monmouth [Edenstone].
LPA Response	Objective 12 is considered appropriate and reflects the issues the Plan is seeking to address. However, an update has been made to reflect the Community and Corporate Plan objectives which aims to ensure Monmouthshire is a connected place where people feel part of a community and are valued. All objectives have been updated to include the relevant Gwent Public Service Board Well-being Plan Steps and the Community and Corporate Plan Objectives.
LPA Recommendation	Minor changes made, as above. Wider update for all objectives to include the relevant Gwent Public Service Board Well-being Plan Steps and the Community and Corporate Plan Objectives.
Objective 13 (Rural communities)	• Welcome growth being directed to a degree towards Secondary Settlements and Main Rural Settlements [Llanover Estates, Leathdunn Ltd., Johnsey Estates 2020 Ltd & The Coldbrook Estate].

	• Strongly suggest a distinction should be made between small, isolated settlements and the wider rural community as a whole, suggest changing objective to 'thriving and sustainable settlements that are founded within the rural way of life' [Melin Homes, Llanarth Estates, Tirion Homes, Candleston Homes, Sero Homes, Sero & Private individuals x 2]. • Suggest a lot of affordable housing additions will be required in order to sustain rural communities, suggest those closest to Primary and Secondary Settlements will offer easy access to markets and provide an expanded horticultural growing sector [Abergavenny Transition Town]. • Agree with this objective, note the appropriate distribution of new development to key rural settlements particularly those higher in the hierarchy will be critical to achieving this objective [Richborough Estates]. • Support objective, suggest focus should be on brownfield sites that are not isolated in the countryside that have a relationship with urban settlements to prevent longer journeys [Private individual x 1].
LPA Response	Objective 13 is considered appropriate and reflects the issues the Plan is seeking to address. The growth and spatial strategy focusses growth in the County's most sustainable settlements, however some growth is directed to the most sustainable rural settlements to deliver much needed affordable homes and to address rural inequity and rural isolation in these areas, further details are included within the wider RLDP and detailed policy framework of the Deposit Plan. All objectives have been updated to include the relevant Gwent Public Service Board Well-being Plan Steps and the Community and Corporate Plan Objectives.
LPA Recommendation	No change required. Wider update for all objectives to include the relevant Gwent Public Service Board Well-being Plan Steps and the Community and Corporate Plan Objectives.
Objective 14 (Infrastructure)	• State no figures are provided on how much broadband digital roll out is falling short of targets and the timescales this will be remedied [Abergavenny Transition Town]. • Note reference should also be made to the need to identify infrastructure capable of resolving the phosphate issue affecting the Upper River Wye catchment [Richborough Estates]. • Suggest this fails to note the lack of infrastructure in the south of the County, state this is currently at breaking point in Chepstow and surrounding areas [Cllr Louise Brown & Private individuals x 3]. • Suggest the need for appropriate physical and digital infrastructure should be assessed on a site-by-site basis in context to the scale of development proposed [Edenstone].
LPA Response	Objective 14 is considered appropriate and reflects the issues the Plan is seeking to address. Infrastructure requirements are included within the wider RLDP and detailed policy framework of the Deposit Plan. An Infrastructure Delivery Plan has also been prepared which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of the allocated sites, a summary of which noting site specific considerations is included as an appendix to the Deposit Plan. All objectives have been updated to include the relevant Gwent Public Service Board Well-being Plan Steps and the Community and Corporate Plan Objectives.
LPA Recommendation	No change required. Wider update for all objectives to include the relevant Gwent Public Service Board Well-being Plan Steps and the Community and Corporate Plan Objectives.
Objective 15 (Accessibility)	• Support the use of private car as the last option for travelling [Abergavenny Transition Town]. • Welcome objective recognising accessibility can be achieved via a variety of means [Richborough Estates]. • Use of wording is questioned suggesting to 'seek to' and also 'provide opportunities for' is creating an excuse to fail and therefore weak and non-committal. Suggest should instead have a policy to improve transport connectivity, safety, frequency and reliability [Cllr Christopher Edwards & Private individual x 1].

LPA Response	Objective 15 is considered appropriate and reflects the issues the Plan is seeking to address. Further details relating to the transport hierarchy, active travel and sustainable transport are included within the wider RLDP and detailed policy framework of the Deposit Plan. All objectives have been updated to include the relevant Gwent Public Service Board Well-being Plan Steps and the Community and Corporate Plan Objectives.
LPA Recommendation	No change required. Wider update for all objectives to include the relevant Gwent Public Service Board Well-being Plan Steps and the Community and Corporate Plan Objectives.
Objective 16 (Culture, Heritage and Welsh Language)	• Support Objective 16 in the context of the Welsh language but it is unclear how the Council intends to achieve this [Welsh Language Commissioner]. • Suggest tourism shouldn't be included in this objective as many aspects demote the use of Welsh language [Abergavenny Transition Town]. • Suggest this objective won't be achieved as traffic queues will prevent repeat tourism visits [Cllr Louise Brown].
LPA Response	Objective 16 is considered appropriate and reflects the issues the Plan is seeking to address. Additional information relating to Welsh Language is considered further in the wider RLDP. All objectives have been updated to include the relevant Gwent Public Service Board Well-being Plan Steps and the Community and Corporate Plan Objectives.
LPA Recommendation	No change required. Wider update for all objectives to include the relevant Gwent Public Service Board Well-being Plan Steps and the Community and Corporate Plan Objectives.
Objective 17 (Climate and Nature Emergency)	• Disappointed Climate Crisis is the last objective, state would like this to be the principal objective overarching the RLDP [Abergavenny Town Council & Abergavenny Transition Town]. • Question whether it is possible for Monmouthshire to achieve this, suggest it cannot be monitored and should therefore be reworded to indicate the Council 'will play a part in wider global ambitions' [Home Builders Federation]. • Welcome inclusion of reference to a zero Carbon County in line with Monmouthshire's declaration of a climate emergency [Melin Homes, Llanarth Estates, Tirion Homes, Candleston Homes, Sero Homes, Sero & Private individuals x 2]. • Welcome the change to reflect the climate emergency, remain of the view that a commitment to carbon zero should be made and assessed through the candidate site process [Melin Homes & Llanarth Estates]. • Note there is no mention of lowering the carbon footprint of in-commuting [Abergavenny Transition Town]. • Acknowledge and support the change of wording in this objective, particularly support the commitment to deliver 'net zero carbon ready new homes' [Natural Resources Wales]. • State this is too high level to be deliverable at a site development scale, suggest it belongs better in the vision as it cannot be measured [Cllr Christopher Edwards & Private individual x 1]. • Suggest objective 17 won't be achieved as air quality will not be improved due to extra traffic flows in a small area in the south of the County. [Cllr Louise Brown]. • Rightly acknowledges the climate emergency as a key factor, need to ensure all site allocations are capable of meeting these provisions whilst remaining viable [Tompkins Thomas Planning]. • Suggest rewording 'To strive to limit the increase in global temperatures to 1.5oC' to 'To strive to pursue policies and action which contribute to the international goal of limiting the increase in global temperatures to 1.5oC' as it implies MCC policies could have this effect [Private individual x 1]. • Refer to objective wording 'provide ultra-low emission vehicle charging infrastructure' suggest replacing this with 'the provision of appropriate measures to reduce vehicle emissions' as in a rural farming county there are many diesel vehicles, the rewording would cover all possibilities [Private individual x 1].

	• Suggest the zero carbon requirement for new homes may put off developers given the expense [Usk Civic Society]. • Suggest building in the south of the County encourages out-commuting [Private individuals x 2]. • Refer to wording suggesting 'to strive to limit the increase' is vague wording and should instead be 'has committed to limit'. Questions what 'strengthened emphasis on nature recovery' means. State wording should be specific, targeted and meaningful due to the emergency [Private individual x 1]. • Question the link between the Monmouthshire Public Service Board Well-being plan objective and the Welsh language in objective 16 [Private individual x 1]. • State this objective is well defined and will help to ensure climate change and nature emergencies are effectively recognised and actioned [Private individual x 1]. • Suggest given the broad nature of climate change policies covering the topic should be prescriptive to particular types of mitigation and considered on a site-by-site basis [Edenstone].
LPA Response	Comments noted. The list of objectives is not ranked in any way. The Council's approach to climate change, nature recovery and net zero carbon requirements is included within the wider RLDP and detailed policy framework of the Deposit Plan. The wording of this objective has been updated in line with the Preferred Strategy Update in September 2023 to remove the word 'ready' (in relation to net zero carbon). All objectives have been updated to include the relevant Gwent Public Service Board Well-being Plan Steps and the Community and Corporate Plan Objectives.
LPA Recommendation	Minor change made following the Preferred Strategy Update in September 2023 to remove references to 'ready' in the context of net zero carbon. Wider update for all objectives to include the relevant Gwent Public Service Board Well-being Plan Steps and the Community and Corporate Plan Objectives.
Objectives general	• Refer to objectives that have increased emphasis in light of Covid-19, suggest objectives 11, 12, 15 and 16 are also of increased importance as they form part of the Welsh Government's Placemaking and the Covid-19 recovery planning guidance Building Better Places (July 2020) [Redrow Homes Limited & Barwood Development Securities Limited]. • State the objectives are aspirational and welcomed but not convinced based on evidence provided they are fully achievable within the existing statutory planning regulations and functions [Abergavenny Town Council]. • Suggest green tourism is missing from the objectives, suggest this can bring in younger visitors to the area [Private individual x 1].
LPA Response	Comments noted. The reference to objectives having increased emphasis in light of Covid-19 has been removed as this related to a fixed period of time and is no longer considered relevant. The Council's approach to tourism is included within the wider RLDP and detailed policy framework of the Deposit Plan.
LPA Recommendation	No change required.
Missing challenges	• State there are a number of challenges that are not specifically addressed: Covid 19/Recession/Cost of living crisis, Phosphates, Rural core of the Authority, Capacity of infrastructure, Constraints to main settlements, Commuter challenges [Melin Homes, Llanarth Estates, Tirion Homes, Candleston Homes, Sero Homes, Sero & Private individuals x 2]. • Refer to quality of existing housing in terms of insulation, carbon footprint, suggest this should be included as a challenge [Private individual x 1].

LPA Response	Comments noted, while some of these challenges are not specifically addressed many are considered in the wider RLDP and policy framework. All objectives have been updated to include the relevant Gwent Public Service Board Well-being Plan Steps and the Community and Corporate Plan Objectives where some of these issues are also considered.
LPA Recommendation	No change required.
Area specific – Chepstow	• Refer to Chepstow as being 'The Green Gateway to Wales' state this will be lost if the RLDP vision is put into practice [Private individual x 1]. • Concern over the lack of support for the high street in Chepstow, stating it is in gradual decline. State it is not a one strategy fitting all case and that other centres operate differently [Cllr Christopher Edwards & Private individuals x 2]. • Refer to the national green belt stating the spread of Chepstow towards the boundary should be resisted [Cllr Christopher Edwards, Cllr Louise Brown & Private individual x 1]. • State the South East Wales Metro Project will provide no benefits for commuters from Chepstow due to service frequency and reliability, suggest there is no confidence in adequate investment supporting the growth of Monmouthshire [Cllr Christopher Edwards & Private individual x 1]. • State the vision represents a planner's utopia and is therefore aspirational, suggest it lacks local flavour. Consider County boundaries are not relevant to how people live their lives and that Chepstow is likely to experience this more than other towns. Question how the vision can better reflect the reality of lives without administrative borders [Cllr Christopher Edwards & Private individual x 1]. • Refer to objective 14 stating significant investment will be needed to bring current facilities in Chepstow up to an appropriate standard which is beyond the scope of S106 or other developer contributions, question how the Council will ensure there is improvement to these infrastructure needs before allowing growth to continue [Cllr Christopher Edwards & Private individual x 1]. • Refer to road infrastructure needed prior to new housing in Chepstow, concern over lack of response from Welsh Government for improvements to High Beech roundabout [Cllr Louise Brown]. • Concern there is no mention of impact of developments in Forest of Dean on Chepstow in this section, refers to the need for a by-pass and a need for road infrastructure to come first [Cllr Louise Brown & Private individual x 1]. • State the particular issues of Chepstow and the Severnside area are not taken in a coherent integrated way, should recognise the areas importance as an environmental resource and link between the Newport/Cardiff and Bristol areas [The Chepstow Society]. • Refer to the Bayfield allocation suggesting it contradicts objective 3 as it adjoins the AONB and is at odds with objectives 12 and 14 [Private individual x 1]. • While note the vision and objectives seem fair they try to meet different targets, concern over increase in Chepstow over recent years, the RLDP will worsen existing infrastructure issues [Private individuals x 2]. • Question why there are no proposals for hi-technology in the Chepstow area suggesting this is a missed opportunity to cater for the expanding industry as Bristol has reached capacity [Private individual x 1].
LPA Response	The Council has worked/continues to work collaboratively with the Forest of Dean and South Gloucestershire councils on cross-boundary issues affecting Chepstow in relation to the A48. A Strategic Transport Assessment (STA) has been undertaken by TfW in order to understand the cumulative impact the proposed housing growth will have on Monmouthshire's transport network. The STA concludes a slight increase in traffic flows with the proposed Chepstow/ Severnside developments. The STA considers the impact of highway travel and traffic pressure from the Forest of Dean and the surrounding area upon the highway network including Highbeech roundabout in the Chepstow locality. Transport Assessments will be required to identify localised issues, set out specific mitigation and highway improvements to ensure traffic safety and capacity on the roads and that proposed development accords with the 'Sustainable

	Transport Hierarchy'. An infrastructure Delivery Plan (IDP) has also been prepared which sets out the highway infrastructure requirements for allocated sites. The RLDP aims to broadly align the spatial distribution of housing and employment growth through-out the County and provide a range and choice of sites. Employment site allocations are set out in the Employment and Economy section of the Plan - Policies EA1a-EA1m. This does not specify the exact use of employment sites but does note whether the sites are allocated for B1, B2 or B8 uses. It is not considered necessary to include settlement specific objectives in the RLDP. Details regarding the strategic site allocation in Chepstow are appropriately set out in the RLDP and relevant supporting background papers, please refer Questions 9 and 11 of the Report of Consultation in relation to the Chepstow Strategic Site allocation for further detail. No changes are proposed.
LPA Recommendation	No change required.
Area specific – Severnside	• Suggest encouraging developments in Severnside will affect goals of encouraging use of the Welsh language as likely to be people moving in from Bristol and the South East [Private individual x 1]. • Refer to Caldicot East site stating it will negatively impact the health and well-being goals by depriving the locality of green space and the tourist attraction of the David Broom Event Centre [Private individuals x 2]. • State the well-being objectives will not be achievable for Caldicot East, the exclusion of a site in Monmouth disproportionately affects the Severnside area [Private individual x 1]. • Refer to placemaking and need to develop appropriately to ensure balanced and attractive places to live, suggest the Caldicot East site results in overdevelopment and would result in a negative impact on communities in Severnside [Private individuals x 2].
LPA Response	Comments noted, the promotion of greater opportunities for children, residents of all ages and the workforce to learn and speak Welsh is identified in the Monmouthshire Welsh Education Strategic Plan (WESP). Monmouthshire has Welsh medium primary schools in Abergavenny, Caldicot and Monmouth (Monmouth is using a seedling school model from September 2024), children in new developments across the County will have access to these schools should they wish to attend a Welsh medium primary school. National planning policies provide advice regarding the consideration of Welsh language in development and will be taken into account in the determination of planning applications, where appropriate. Policy HA2 relates to Land to the East of Caldicot, the proposal includes a substantial amount of public open space and recreation uses and brings more land into public use which is of benefit to the wider community. Part of the site in ownership by the David Broom Event Centre and has put forward as a development opportunity by the landowner. The Preferred Strategy (2022) proposed no new site allocations in Monmouth, or within the upper River Wye catchment north of Bigsweir Bridge and also assumed no existing planning permissions or small/windfall sites could come forward. This approach was taken due to the lack of an identified strategic solution to the treatment of phosphates at the Monmouth Wastewater Treatment Works (WwTW) within the Plan period. Welsh Government's response letter to the 2022 Preferred Strategy advised that new site allocations should be made in Monmouth on the basis that sufficient certainty is provided by DCWW's planned improvements at the Monmouth Wastewater Treatment Works by 31st March 2025. Following Welsh Government's confidence in the removal of this constraint, Council agreed in October 2023 to the identification of a strategic site in Monmouth as well as including allowances towards windfall and infill allowances and existing commitments already with planning permission. It is not considered necessary to include settlement specific objectives in the RLDP. Details regarding the strategic site allocation at Caldicot East are appropriately set out in the RLDP and relevant supporting background papers. No changes are proposed.

LPA Recommendation	No change required.
Area specific – Abergavenny	Refer to greenbelt study and sites in Abergavenny, state this should take place before sites are considered for development/protection [Private individual x 1]. Question how jobs are expected to appear in alignment with the proposed addition of 500 dwellings in Abergavenny as it is not in the Cardiff Capital City Region Deal area, suggest unlikely to see benefits [Private individual x 1].
LPA Response	Comments noted. A Green Belt is not proposed in Abergavenny in accordance with Future Wales (WG, 2021). The Green Wedge Assessment has informed the designation of green wedges throughout the County and has been considered as part of the site selection process. The RLDP seeks to support economic growth through the inclusion of an overarching strategy and potential jobs growth figure that could be supported by the population and housing growth planned over the Plan period. The RLDP will seeks to achieve this through the allocation of a range of B use class employment sites and a supportive policy framework for jobs that will be delivered other sectors such as tourism, leisure food, retail and agriculture. It is recognised that the RLDP is only one mechanism for delivering on economic growth. The Economy, Employment and Skills Strategy (EESS) sets out the Council's direction of travel and action plan for achieving economic growth. It is not considered necessary to include settlement specific objectives in the RLDP. No changes are proposed.
LPA Recommendation	No change required.
Area specific – Monmouth	• State the vision will be difficult to achieve in full on a County wide basis without the identification of any new housing/economic allocations in the Upper River Wye Catchment [Richborough Estates]. • Support a strategic site allocation in Monmouth subject to the solution to the phosphates issue, need to ensure the RLDP realises the role Monmouth has in contribution to sustainable growth of the County to 2033 [Richborough Estates, Vistry Group, Edenstone & Private individual x 1].
LPA Response	Comment noted, the Preferred Strategy (2022) proposed no new site allocations in Monmouth, or within the upper River Wye catchment north of Bigsweir Bridge and also assumed no existing planning permissions or small/windfall sites could come forward. This approach was taken due to the lack of an identified strategic solution to the treatment of phosphates at the Monmouth Wastewater Treatment Works (WwTW) within the Plan period. Welsh Government's response letter to the 2022 Preferred Strategy advised that new site allocations should be made in Monmouth on the basis that sufficient certainty is provided by DCWW's planned improvements at the Monmouth Wastewater Treatment Works by 31st March 2025. Following Welsh Government's confidence in the removal of this constraint, Council agreed in October 2023 to the identification of a strategic site in Monmouth as well as including allowances towards windfall and infill allowances and existing commitments already with planning permission.
LPA Recommendation	No change required.
Site specific - other	• Refer to CS0242 Land north of New House, Llangybi suggest objectives 3, 4, 5 and 14 cannot be met and would not meet statutory obligations under section 6 of the Environment Act (Wales) 2016 to protect the environment [Private individual x 1]. • Refer to CS0113 Castle Oaks Site D, CS0039 Land at Little Castle Farm & CS0282 Land north of Burrium Gate stating these would increase the volume or concentration of wastewater resulting in phosphate impact. Suggest they would not meet objectives 4, 12, 14 or 17 [Private individual x 1].
LPA Response	Candidate site submissions have been considered as part of the candidate site assessment. Individual site recommendations can be viewed in the Candidate Site Assessment Report.

LPA Recommendation	No change required.
Promotion of sites	• Promote CS0103 Land adjacent Berthon Road, Little Mill noting the ranking of settlements should be considered. Suggest the site aligns with Objective 13 [Monmouthshire Housing Association]. • Promote CS0247 Coopers III noting the Deposit Plan should continue to direct development and investment to the County towns, including this site [Johnsey Estates 2020 Ltd]. • Promote CS0105 Land at Former Goods Yard, Usk noting development of this land offers an opportunity to help achieve Objective 6 and in respect of Objective 4 opens an opportunity to redevelop a brownfield site with measures that can improve flood resilience and incorporate sustainable drainage principles [Private individual x 1]. • Promote CS0111 Land adjacent Thistledown Barn, Shirenewton noting Objectives 10, 12 and 13 can all be met [Private individual x 1]. • Promote CS0128 Land at Chapel Farm noting it can fully support the vision [Hallam Land Management]. • Promote CS0269 Land at Grove Farm, Llanfoist for a mixed-use care village noting it can deliver the vision, objectives and assist in key issues [Grove Farm Estates & Development]. • Promote CS0274 Land to the north of Wonastow Road as it represents an appropriate opportunity for a sustainable mixed use strategic allocation for the settlement [Richborough Estates]. • Promote CS0271 Land at Vauxhall Fields, Monmouth noting this aligns with the vision and will contribute to the achievement of the 17 RLDP objectives [Edenstone Group]. • Promote CS0165 noting this aligns with the vision and will contribute to the achievement of the 17 RLDP objectives [Barwood Development Securities Limited]. • Promote CS0206 South of Newport Road, Magor noting this aligns with the vision and will contribute to the achievement of the 17 RLDP objectives [Edenstone]. • Promote CS0280 Land at Walnut Tree Farm, Penperlleni noting this aligns with the vision and will contribute to the achievement of the 17 RLDP objectives [Edenstone]. • Promote CS0189 Land at Tudor Road, Wyesham noting it is sustainable and can contribute to the Council's Vision and Objectives, delivering a '20-minute neighbourhood' [Edenstone].
LPA Response	Candidate site submissions have been considered as part of the candidate site assessment. Individual site recommendations can be viewed in the Candidate Site Assessment Report.
LPA Recommendation	No change required.
Other	• Concerned over the emphasis on residential development with insufficient employment land allocation [Abergavenny Town Council]. • Suggest the issues, vision and objectives are well meaning but vague with no mention of the need to react to climate change [Abergavenny & Crickhowell Friends of the Earth]. • Suggests there is a conflict between becoming a zero carbon County and significant expansion of secondary settlements which will sharply increase commuting, state there is no evidence that the number of houses provided reflects what the population really need or population growth. Also concerned the evidence is based on an out of date census [Private individual x 1].

	• Suggest table of objectives informed by the PSB Well Being Plan creates a utopian wish list with a lack of hard focus on actions on the climate and nature emergency issue [Abergavenny Transition Town]. • A further matter for consideration is delivery immediately after the RLDP is adopted to ensure the implementation of the plan is possible in the remainder of the plan period [Leathdunn Ltd. & Johnsey Estates 2020 Ltd]. • Note Future Wales provides a positive basis for growth, disagree with Welsh Governments approach that suggests growth will undermine delivery of the National Plan [Redrow Homes & Richborough Estates]. • State the RLDP should make specific allocations for older peoples housing including care provision [Grove Farm Estates & Development]. • Suggest the plan period should be extended to cover an increased timescale beyond 2033 with associated amendments to the RLDP housing requirement [Edenstone Group & Edenstone]. • State housing numbers are too high and question where the evidence of jobs is and who will provide them, significant investment would be needed [Private individual x 1].
LPA Response	Comments noted, many of the comments raised above are considered in the wider RLDP and policy framework.
LPA Recommendation	No change required.

Question 2 – Do you have any comments on the Preferred Strategy?

9 organisations or members of the public submitted a response to question 2.

Given the overlap with the Preferred Strategy and the policy content of S1 – Growth Strategy and S2 – Spatial Distribution, there are similarities in the answers given to consultation questions 2, 3 & 4. A range of comments have been made on the Preferred Strategy, with some representors in broad support, others suggesting the Strategy is not ambitious enough and other suggesting it is too high. There was a recognition on both sides that the Preferred Strategy represents a compromised approach to addressing the County's issues and challenges whilst also addressing Welsh Government's objections to the previous Preferred Strategy (2021).

General support given to the distribution of growth, focused on the Primary Settlements, however, more evenly dispersed growth across settlements, including Monmouth and lower tiers was raised. Concern was raised at the level of growth focussed in the south of the County.

In terms of the housing supply components, the consensus is that the flexibility allowance is too low with a 20% or 25% flexibility allowance suggested as more appropriate rates. An over-reliance on windfall/infills and existing commitments was expressed. Similarly, concerns were raised in relation to an over reliance on a small number of strategic sites and the potential impact on delivery homes and affordable homes within the plan period.

Key themes raised in relation to Question 2 on the Preferred Strategy are set out below:

Key Theme	Summary of Points Raised
Growth level represents compromise and is supported.	• Growth level is a more appropriate fit with FW 2020. The PS is in general conformity with Policies 1, 7 and 33 of FW 2020 and does not undermine the role of Cardiff, Newport, and the Valleys as the main focus for growth and investment in the Southeast region but reflects the urgent need to increase the supply of affordable housing in Monmouthshire. [WG] • Growth level represents a compromise between the 2021 Preferred Strategy and Welsh Government prescribed level. [Abergavenny Town Council, Private Individual, Abergavenny & District Civic Society] • PS provides a clear direction to enable sustainable growth across the County over the Plan period. [Llanover Estates, Leathdunn Ltd, Johnsey Estates, MHA, Vistry Group, Coldbrook Estate]

	• Recognised the revised PS responds to a number of challenges including WG's objection and water quality issues. [Hallam Land Management, Edenstone]
LPA Response	The 2022 Preferred Strategy growth level of 5,400 homes housing requirement and enabling the provision of up to 6,240 jobs strikes a compromise between achieving our local evidenced-based objectives that underpin the RLDP and the Welsh Government's objection to the level of growth proposed in the 2021 Preferred Strategy. This level of growth has been informed by a wide range of evidence and responded to a number of challenges that have arisen throughout the plan making process including the Welsh Government objection to the level of growth set out in the 2021 Preferred Strategy and phosphate water quality issues in the Rivers Wye and Usk. In October 2023, a number of post-consultation updates to the Preferred Strategy (2022) were endorsed by Council forming the basis for the level of growth set out in the Deposit Plan. These include allowing for growth in Monmouth which was previously avoided due to no phosphates solution being identified for the River Wye Catchment area and an increase in the flexibility rate from 10% to 15%. This has resulted in the housing provision figure increasing from 5,940 homes (10% flexibility) to 6,210 homes (15% flexibility). Welsh Government formally responded to the Preferred Strategy consultation in January 2023 with a 'green' rating and noting that "Future Wales places great emphasis on the development of National Growth Areas and the need for additional affordable housing. The Preferred Strategy is in general conformity with Policies 1, 7 and 33 of Future Wales and does not undermine the role of Cardiff, Newport and the Valleys as the main focus for growth and investment in the south east region but reflects the urgent need to increase the supply of affordable housing in Monmouthshire." In this respect, the level of growth proposed has been deemed in conformity with Future Wales by Welsh Government. The Deposit Plan is considered to represent a sustainable level of growth that addresses our local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency and having regard to Welsh Government's concerns regarding alignment with Future Wales.
LPA Recommendation	In line with the October 2023 Council decision, the housing requirement remains at 5,400 homes based on a demographic-led scenario with added policy assumptions, however, the flexibility allowance is increased from 10% to 15% resulting in a housing provision figure of 6,210 homes.
Growth Level is too low	• Proposed growth level will not deliver enough homes to satisfy current needs. [Chepstow Town Council, BB3 Ltd, Richard Willett, Manor Farm Partnership, Private Individuals x 3] • Disappointment at the significant reduction in the housing provision number from that justified by evidence in the previous version of the PS question whether the revised option enables a sufficiently aspirational vision and strategy for the Plan [Barratt & David Wilson] • Approach taken seems to have been entirely shaped by Welsh Government's policy position requiring a low growth approach rather than an approach that is capable of providing the more positive planning intervention required to address the issues identified. Higher growth option should have been considered based on the evidence and significant issues facing the County. [Melin Homes, Llanarth Estates, Tirion Homes, Candleston Homes, Sero Homes, Sero, Private Individuals x 2] • Acknowledge the Council has had to temper the level of growth pursued due to WG's objection, however, question whether the evidence base supports the reduced level of growth. Growth level does not provide sufficient growth to redress negative demographic trends for Monmouthshire and harness its economic potential. [Edenstone, Barnwood Development Securities Ltd] • PS leaves the Plan without a clear strategy to deliver the housing needed by Monmouthshire and does not follow logically from the identified Key Issues, RLDP Vision and RLDP Objectives. It therefore fails to satisfy Soundness Tests 2 & 3. Disagree with the WG assertion that by meeting its evidenced growth needs the RLDP would undermine delivery of the FW 2020 growth area. [Redrow] • Increase in housing supply should be pursued to address affordability issues rather than a blanket 50% affordable housing requirement. [Edenstone]
LPA Response	The 2022 Preferred Strategy growth level of 5,400 homes housing requirement and enabling the provision of up to 6,240 jobs strikes a compromise between achieving our local evidenced-based objectives that underpin the RLDP and the Welsh Government's objection to the level of growth proposed

	in the 2021 Preferred Strategy. This level of growth has been informed by a wide range of evidence and responded to a number of challenges that have arisen throughout the plan making process including the Welsh Government objection to the level of growth set out in the 2021 Preferred Strategy and phosphate water quality issues in the Rivers Wye and Usk. In October 2023, a number of post-consultation updates to the Preferred Strategy (2022) were endorsed by Council forming the basis for the level of growth set out in the Deposit Plan. These include allowing for growth in Monmouth which was previously avoided due to no phosphates solution being identified for the River Wye Catchment area and an increase in the flexibility rate from 10% to 15%. This has resulted in the housing provision figure increasing from 5,940 homes (10% flexibility) to 6,210 homes (15% flexibility). Welsh Government formally responded to the Preferred Strategy consultation in January 2023 with a 'green' rating and noting that "Future Wales places great emphasis on the development of National Growth Areas and the need for additional affordable housing. The Preferred Strategy is in general conformity with Policies 1, 7 and 33 of Future Wales and does not undermine the role of Cardiff, Newport and the Valleys as the main focus for growth and investment in the south east region but reflects the urgent need to increase the supply of affordable housing in Monmouthshire." In this respect, the level of growth proposed has been deemed in conformity with Future Wales by Welsh Government. The Deposit Plan is considered to represent a sustainable level of growth that addresses our local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency and having regard to Welsh Government's concerns regarding alignment with Future Wales.
LPA Recommendation	In line with the October 2023 Council decision, the housing requirement remains at 5,400 homes based on a demographic-led scenario with added policy assumptions, however, the flexibility allowance is increased from 10% to 15% resulting in a housing provision figure of 6,210 homes.
Growth level is too high	• Housing target is excessive and contrary to FW 2040 creating a risk to the adoption of the RLDP. [Llanarth Fawr CC; Raglan CC, Private Individuals x 6, Cllr Louise Brown, Chepstow Society, Cllr Christopher Edwards] • PS growth level is contrary to a number of the RLDP objectives and will attract people from outside the County exacerbating out-commuting and worsening the affordability issues [Private Individual x 3] • Housing requirement figure is excessive – WG's view is that it should be no more than 4,725 dwellings. Danger that an excessive housing target will cascade excessive development down to Secondary Settlements of Raglan, Usk and Penperlleni. [Raglan Village Action Group, Usk Civic Society, Private Individual]
LPA Response	The 2022 Preferred Strategy growth level of 5,400 homes housing requirement and enabling the provision of up to 6,240 jobs strikes a compromise between achieving our local evidenced-based objectives that underpin the RLDP and the Welsh Government's objection to the level of growth proposed in the 2021 Preferred Strategy. This level of growth has been informed by a wide range of evidence and responded to a number of challenges that have arisen throughout the plan making process including the Welsh Government objection to the level of growth set out in the 2021 Preferred Strategy and phosphate water quality issues in the Rivers Wye and Usk. In October 2023, a number of post-consultation updates to the Preferred Strategy (2022) were endorsed by Council forming the basis for the level of growth set out in the Deposit Plan. These include allowing for growth in Monmouth which was previously avoided due to no phosphates solution being identified for the River Wye Catchment area and an increase in the flexibility rate from 10% to 15%. This has resulted in the housing provision figure increasing from 5,940 homes (10% flexibility) to 6,210 homes (15% flexibility). Welsh Government formally responded to the Preferred Strategy consultation in January 2023 with a 'green' rating and noting that "Future Wales places great emphasis on the development of National Growth Areas and the need for additional affordable housing. The Preferred Strategy is in general conformity with Policies 1, 7 and 33 of Future Wales and does not undermine the role of Cardiff, Newport and the Valleys as the main focus for growth and investment in the south east region but reflects the urgent need to increase the supply of affordable housing in Monmouthshire." In this respect, the level of growth proposed has been deemed in conformity with Future Wales by Welsh Government.

	The Deposit Plan is considered to represent a sustainable level of growth that addresses our local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency and having regard to Welsh Government's concerns regarding alignment with Future Wales.
LPA Recommendation	In line with the October 2023 Council decision, the housing requirement remains at 5,400 homes based on a demographic-led scenario with added policy assumptions, however, the flexibility allowance is increased from 10% to 15% resulting in a housing provision figure of 6,210 homes.
Spatial Distribution	• Proportionate growth distribution is welcomed. [Dwr Cymru] • Support general approach, however, the Deposit Plan should place greater value on the Main Rural Settlements to accommodate growth. [Llanover Estates, Coldbrook Estate] • Support for focus on growth in the County's most sustainable primary settlements [BDW] • Over provision in the south of the County, which will exacerbate out-commuting and loss of young people and place strain on inadequate infrastructure. [Melin Homes, Hallam Land Management, Llanarth Estates, Cllr Louise Brown, Private Individuals x 7, Tirion Homes, Candleston Homes, Sero Homes, Sero] • Focus of development in the south of the County contrary to FW2020 as intention is for a Green Belt in the area. [Cllr Louise Brown, Private Individual] • Inappropriate and unsound to rule out long term policy intervention such as a new settlement without fully considering the benefits it can bring. [Melin Homes] • Step change in approach, such as a new settlement, required if the Council is to address the issues facing the County. Adding incrementally to existing settlements alone will not achieve aims. [Llanarth Estates, Tirion Homes, Private Individual] • Increase distribution and provision at lower tier settlements [MHA, BB3 Ltd, Manor Farm Partnership, Coldbrook Estate, Private Individuals x 6] • Greater proportion of growth should be apportioned to Chepstow. [Barwood Development Securities] • NRW's understanding is that Llanfoist WwTW (along with Monmouth WwTW) have been identified in the National Environment Programme (NEP) as requiring investment to reduce phosphorus discharges. These have been proposed for improvements in AMP8 (2025-2030), however some uncertainty remains as to whether the investment will be confirmed until the water company business plans have been reviewed and agreed by OFWAT. Therefore, if DCWW have advised that investment at Llanfoist can be brought forward from AMP8 to AMP7 with early completion of the improvement works by 2025, this needs to be evidenced. Situation with River Wye Catchment and solution at the Monmouth WwTW may change within the Plan period. [NRW] • The completion of over 1400 homes at Caldicot (including Severnside) is ambitious, particularly that upon adoption the plan will only have eight years remaining in the plan period. A re-distribution of sites to include additional allocations across the County would de-risk the Plan. [Johnsey Estates] • Not clear how the most sustainable rural sites are being identified - many are declining in terms of facilities. [Llangybi Fawr CC] • Willingness to allow housing development in rural areas should be brought together with the aim of strengthening the rural economy, by creating small farmhouses. [Our Food 1200]
LPA Response	Support for spatial distribution of growth is welcomed. The Settlement Hierarchy set out in Policy S2 reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. The SSA confirms the dominant role of the primary settlements of Abergavenny, Chepstow, Caldicot and Monmouth, with this reflected in 85% of the level of housing growth proposed in these settlements.

	Spatially, the growth is considered to be well distributed throughout the County to help address affordability issues across Monmouthshire. The southern settlements of Chepstow and Caldicot account for 48% of the housing growth proposed and the northern primary settlements of Abergavenny and Monmouth account of 37%. It is recognised that Caldicot and the Severnside cluster account for 35% of housing growth, however, Welsh Government acknowledge the strong functional linkage with Newport, Cardiff and Bristol and "the concentration of new growth primarily in Caldicot and the Severnside area should reduce the potential to negatively impact on environmental assets and avoid consequences for climate and nature emergencies". The spatial strategy has regard to Policy 34 and the indicative Green Belt boundary. Monmouthshire's primary settlements fall outside of the indicative Green Belt boundary. National planning policy allows for extensions to existing settlements within and adjoining the Green Belt of appropriate scale having regard to the identified and longer-term need for development land, the effects of development pressures in areas beyond Green Belt, the need to minimise demand travel, and the purpose of the overall greenbelt designation. It states that this may require land to be safeguarded and boundaries of proposed Green Belts must be carefully defined to achieve this. Paragraph 3.53 of PPW12 states that due to their strategic nature new settlements should only be proposed as part of a joint LDP, an SDP or Future Wales. The RLDP approach to rural housing is consistent with national policy. The Council is working collaboratively with NRW and Dwr Cymru Welsh Water in relation to phosphate issue and this will continue as the Plan progresses to inform site specific delivery and reflect improvement timescales.
LPA Recommendation	No changes to the Settlement Hierarchy required, however, update Policy S2 to include housing and employment monitoring data up to the 1st April 2024 base date; to reflect growth will now be allowed in the River Wye Catchment area following Dwr Cymru Welsh Water investment and Welsh Government advice and increases in the flexibility rate from 10% to 15%.
Settlement Hierarchy	• Little Mill should be recategorized as a Tier 2 Settlement. [MHA]
LPA Response	The Settlement Hierarchy set out in Policy S2 reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. Further information on the methodology can be found in the SSA.
LPA Recommendation	No change required.
Strategic Sites/Delivery	• Spatial strategy realises the importance of focussing growth in the County's primary and secondary settlements but could be considered to over-rely on two large strategic sites [Lethdunn Ltd, Johnsey Estates]. • The ability of the large Strategic Sites to deliver the number of units allocated in the PS is questionable, given challenges in the County and adoption not scheduled until summer 2025. A greater number of small/medium allocations is considered essential to make up for this potential shortfall in delivery. [Hallam Land Management]
LPA Response	The Deposit Plan allocates 18 residential/mixed use sites. Whilst it is recognised that two of the strategic sites (HA1 – Land to the East of Abergavenny and HA2 – Land to the East of Caldicot) account for 1,270 homes, there are a further 16 residential allocations ranging in size from 15 units to 270 units contributing to housing delivery in the County. Furthermore, in October 2023 a report of post consultation Preferred Strategy changes was agreed by Council. An increase in the flexibility rate from 10% to 15% was one of the changes agreed. This increased the housing provision figure from 5,940 (10% flexibility) to 6,210 (15% flexibility). The

	change seeks to ensure that the strategic sites at Abergavenny East and Caldicot East are sufficiently large to deliver the required infrastructure whilst also allowing for the allocation of a handful of smaller sites across the County to sustain and enhance existing communities. Increasing the flexibility ensures that the plan is more robust and resilient as there is delivery in the short-term term while the large strategic sites take time to be developed out. An increased flexibility will result in the Plan being able to provide a range and choice of sites and ensure that the plan is not solely reliant on the delivery of larger strategic sites which are more complicated to develop. A range of smaller sites will ensure the delivery of much needed affordable housing soon after the adoption of the plan to start addressing this current unmet affordable housing need. A housing trajectory has been prepared as part of the Deposit Plan, which demonstrates housing delivery rates throughout the Plan period can be achieved.
LPA Recommendation	In line with the October 2023 Council decision, the housing requirement remains at 5,400 homes based on a demographic-led scenario with added policy assumptions, however, the flexibility allowance is increased from 10% to 15% resulting in a housing provision figure of 6,210 homes.
Monmouth Growth	• DWR Cymru – given the significant levels of iron at Monmouth WwTW the design of phosphorous removal scheme requires careful planning. Phosphorus permit limit following the review of permits needed and regulatory sign-off from NRW. However, the commitment is there to undertake necessary works. [Dwr Cymru] • HBF do not agree with the Monmouth sites can be classed as 'bonus sites' within the context of the definition set out in the Development Plans Manual. [HBF, Private Individual] • RLDP evidence base recognises the role Monmouth in the County. There should be allocations for housing made at Monmouth [BB3, Manor Farm Partnership, Vistry Group, Private Individuals x 4] • As set out in the DcWW Improving our River Water Quality (2022) document a £70 million commitment is also being made to reduce phosphate outputs from the WwTW in the River Wye (page 26). With a plan and funding commitment to resolve the phosphates issue moving forward from Monmouth WwTW as well as alternative mitigation routes being explored, there are no planning reasons not to allocate in the Wye Catchment. PS approach to Monmouth would result in no delivery of new housing allocations in Monmouth until 2032, having significant adverse economic and social impacts for Monmouth. [Redrow] • PS is not aspirational as it does not include additional developments in the North of the County and assumes there will be no solution to the river phosphates issue during the Plan period. [Cllr Louise Brown]
LPA Response	The Preferred Strategy (2022) proposed no new site allocations in Monmouth, or within the upper River Wye catchment north of Bigsweir Bridge and also assumed no existing planning permissions or small/windfall sites could come forward. This approach was taken due to the lack of an identified strategic solution to the treatment of phosphates at the Monmouth Wastewater Treatment Works (WwTW) within the Plan period. Welsh Government's response letter to the 2022 Preferred Strategy advised that new site allocations should be made in Monmouth on the basis that sufficient certainty is provided by DCWW's planned improvements at the Monmouth Wastewater Treatment Works by 31st March 2025. Following Welsh Government's confidence in the removal of this constraint, Council agreed in October 2023 to the identification of a strategic site in Monmouth as well as including allowances towards windfall and infill allowances and existing commitments already with planning permission.
LPA Recommendation	In accordance with the October 2023 Council, the Deposit Plan allows for growth in Monmouth.
PS Priorities	• Prominence given to climate change and delivery of affordable housing is welcomed. [FoD] • Welcome policy shift from previous PS to prioritising land allocation for affordable housing and net zero ready homes and range and mix of house sizes. [Abergavenny Transition Town, Private Individual]

	• PS has made positive steps identifying and addressing the climate emergency, most notably reference to becoming a zero-carbon county. Welcome inclusion and reference to the nature emergency, however it is unclear how the policy framework practically seeks to deliver actions that tackle the nature emergency. [NRW] • Affordable housing threshold should not apply to windfall site. [Private Individual] • Supportive of a move towards zero carbon and believe an ambitious target should be set. [Melin Homes, Llanarth Estates, Tirion Homes, Candleston Homes, Sero Homes, Sero, Private Individuals x 3]. • Providing affordable housing in areas where there are no employment opportunities and rail connections makes no sense – blanket affordable housing requirement inappropriate for this reason. [Private Individual] • More effort/consideration should be given to remedial action to address phosphate and other water issues in the Wye. [Private Individual] • Reference to the role and opportunity presented by community led affordable housing would be beneficial. [Cwmpas] • Focus should be on making nice places to live, not building more houses. [Private Individual] • Not enough emphasis on transport issues. [Private Individual] • Stronger focus on energy efficient homes is needed. [Private Individual]
LPA Response	Support for the Preferred Strategy priorities is welcomed, with the core issues of housing affordability, rebalancing our democracy, climate and nature emergency and economic prosperity continuing to be the key priorities of the Deposit Plan. Further details on how these will be achieved is set out in the detailed policy framework of the Deposit Plan.
LPA Recommendation	Refer to the detailed policies of the Deposit Plan for specific policy requirements.
Potential failure to deliver core strategy components	• Risk that zero carbon objectives, extra jobs and extra infrastructure will not be in place in parallel with housing growth resulting in less sustainable settlements. [Abergavenny Town Council, Abergavenny & District Civic Society, Private Individual] • Power network will be a significant constraint on development of renewable energy generation systems and distribution of such energy [BB3 Ltd, Manor Farm Partnership, Private Individuals x3] • RLDP should also cater for the older population. [Grove Farm Estates & Development, Chepstow Society) • Ratio of affordable homes is unrealistic along with zero carbon aspirations. [Mathern CC, Private Individual] • Infrastructure and accessibility insufficient to deliver PS aims and objectives. [Private Individuals x 6, Cllr Louise Brown] • PS will fail to deliver its key aims and objectives and will therefore fail the Tests of Soundness. [Cllr Louise Brown] • More integrated approach needed to improving transport infrastructure and other infrastructure in and near Chepstow. [The Chepstow Society, Private Individuals x 4]
LPA Response	The Deposit Plan is supported by a robust and comprehensive evidence base including the Infrastructure Delivery Plan, which provide further details on the points raised.
LPA Recommendation	No change required.
Cross Boundary Issues	• The Forest of Dean District Council keen to work collaboratively to bring about sustainable solutions to cross boundary transport issues. [FoD]

	• Gloucestershire County Council broadly support stated aims regarding climate and decarbonisation. The importance of reducing transport associated carbon, pollutants a nuisance is paramount and the need to work cooperatively across the Welsh and English border is fundamental to the successful delivery against the zero-carbon agenda. [GCC] • Essential to demonstrate how the targeted increase in population/jobs is consistent with other LDP strategies in the CCR. The level of growth proposed does not harness the economic opportunity presented by the CCR City Deal. [Edenstone] • Levels of growth for individual LPAs should be agreed at a strategic level through the preparation of an SDP. [Private Individual] • Has development across the border been considered? [Private Individual]
LPA Response	The Council has worked/continues to work collaboratively with neighbouring local authorities, including the Forest of Dean and South Gloucestershire councils and authorities in South East Wales, on cross-boundary issues such as growth levels and transport.
LPA Recommendation	No change required.
Flexibility Allowance	• Increase flexibility allowance to ensure the timely delivery of sites. [MHA, Private Individual] • Prudent to increase the flexibility allowance in light of the substantial reduction in growth that is now proposed [Hallam Land Management, Edenstone] • 20% flexibility allowance should be adopted to provide greater contingency to allow for unforeseen circumstances over the plan period, which will be important given the current economic climate and reliance on a small number of strategic sites to deliver a significant component of the RLDP's housing requirement. [Edenstone] • Flexibility allowance is not needed and is likely to be exploited by the developers [Private Individual, Cllr Christopher Edwards]
LPA Response	In October 2023 a report of post-consultation updates to the Preferred Strategy was agreed by Council. An increase in the flexibility rate from 10% to 15% was one of the changes agreed. This increased the housing provision figure from 5,940 (10% flexibility) to 6,210 (15% flexibility). The change seeks to ensure that the strategic sites at Abergavenny East and Caldicot East are sufficiently large to deliver the required infrastructure whilst also allowing for the allocation of a handful of smaller sites across the County to sustain and enhance existing communities. Increasing the flexibility ensures that the plan is more robust and resilient as there is delivery in the short-term term while the large strategic sites take time to be developed out. An increased flexibility will result in the Plan being able to provide a range and choice of sites and ensure that the plan is not solely reliant on the delivery of larger strategic sites which are more complicated to develop. A range of smaller sites will ensure the delivery of much needed affordable housing soon after the adoption of the plan to start addressing this current unmet affordable housing need.
LPA Recommendation	Incorporate a 15% flexibility allowance in the Deposit Plan as agreed by Council in October 2023.
Windfall/Small Site Allowance	• The PS has an over reliance on windfall provision which presents a risk to achieving the level of growth required. To de-risk the Plan less reliance should be given to windfall sites [Leathdunn Ltd, Johnsey Estates] • Ban on windfall sites in the Wye Catchment is an overreaction to an issue caused primarily by agriculture. [Private Individual]
LPA Response	The Housing Background Paper sets out the approach taken to windfall allowances in the preparation of the Deposit Plan. As with the Preferred Strategy, the Deposit Plan includes a windfall allowance based on the findings of the Housing Potential Study. This contributes approximately 230 units to the housing figures, less than an allowance based on past trends, which would contribute 366 homes to the housing figures. In this respect, a

	conservative approach to windfall provision has been taken. Similarly, a reduced contribution has been factored in for infill developments. The past trend rate of infill developments has been reduced by 15% to reflect the plan-led system and infill opportunities reducing.
LPA Recommendation	In accordance with details set out in the Housing Background Paper, base windfall allowances on the findings of the Housing Potential Study and the infill allowance on a reduced past trend rate.
Jobs Growth	• Creation of 6,240 jobs is difficult to believe, especially noting the large reduction in current employment opportunities forecast. Economic Development Strategy needed. [Private Individual, Cllr Christopher Edwards] • Given the continued lack of clarity about the economic growth and how it will be achieved, an Economic Development Strategy is needed. [Private Individual] • Surprised to see the removal of SAE1h Land at Pill Row. [FI Real Estate Management Ltd] • No evidence to support and drives the jobs growth figure. [Private Individual]
LPA Response	The jobs figure contained in the RLPD is based on demographic-led modelling which is considered to be robust and includes reasonable assumptions. The associated jobs figure represents the number of jobs that could be supported by the population and housing growth planned for over the Plan period. It is recognised that it is above the baseline forecasts, however, a policy-on approach provides an appropriate basis for the RLDP to ensure that the Plan can be sufficiently flexible in respect of changing circumstances and that the County can support long term growth in accordance with Welsh Government policy, which encourages the adoption of a long term and positive strategy, and the ambitions of the CCR. Whilst it is recognised the jobs target of 416 jobs per annum is higher than some past trends, it is within the range of past performance in the County. The Council published its Economy, Employment and Skill Strategy in 2023 which sets out the Council's action plan for focussing on four key priority themes which have emerged from the Corporate and Community Plan. Adopted LDP allocation SAE1h – Land at Pill Row is within a flood risk area.
LPA Recommendation	
Lacking details/information	• Question what the Council understand by 'new homes are net zero ready' and how it will be assessed and by whom. [HBF, Private Individual] • PS contains well-meaning but vague statements – Deposit plan must correct this. [Abergavenny & Crickhowell FoE] • Key evidence required for the Deposit Plan including economic growth levels, relationship to adjoining local authorities, ensuring the delivery of 50% affordable housing allocations, site delivery and viability, phosphates and nutrient neutrality and Gypsy and Traveller Accommodation. [WG]. • There is no definition included of an 'Affordable Home'. [Private Individuals x 2] • Data and statistics feeding into the strategy must be examined in more detail to explain the level of growth. [Private Individuals x 2]
LPA Response	The Deposit Plan is supported by a robust and comprehensive evidence base, which provide further details on the points raised.
LPA Recommendation	Refer to the RLDP evidence base for full details on the details requested.
Site Promoted in response to Question 2	• Leathdunn Ltd – CS0036 – West of B4293, Devauden [Leathdunn Ltd] • Johnsey Estates – CS0247 – Cooper III [Johnsey Estates Ltd] • Hallam Land management – CS0128 Chapel Farm [Hallam Land Management] • Grove Farm Estates – CS0269 – Grove Farm [Grove Farm Estates] • Johnsey Estates Ltd – CS0113 – Castle Oaks (Site D) [Johnsey Estates Ltd]

	• Johnsey Estates Ltd – CS0282 – NW Burrium Gate [Johnsey Estates Ltd] • Barwood Development Securities – CS0165 Mounton Road [Barwood Development Securities]
LPA Response	Candidate site submissions have been considered as part of the candidate site assessment. Individual site recommendations can be viewed in Candidate Site Assessment Report.
LPA Recommendation	See Candidate Site Assessment Report for Candidate Site recommendations.

Question 3 – Do you have any comments on Strategic Policy S1 – Growth Strategy?

99 organisations or members of the public submitted a response to question 3.
Given the overlap with the Preferred Strategy and the policy content of S1 – Growth Strategy and S2 – Spatial Distribution, there are similarities in the answers given to consultation questions 2, 3 & 4. A range of comments have been made on the Preferred Strategy, with some representors in broad support, others suggesting the Strategy is not ambitious enough and other suggesting it is too high. There was a recognition on both sides that the Preferred Strategy represents a compromised approach to addressing the County's issues and challenges whilst also addressing Welsh Government's objections to the previous Preferred Strategy (2021).
General support given to the distribution of growth, focused on the Primary Settlements, however, more evenly dispersed growth across settlements, including Monmouth and lower tiers was raised. Concern was raised at the level of growth focussed in the south of the County.
In terms of the housing supply components, the consensus is that the flexibility allowance is too low with a 20% or 25% flexibility allowance suggested as more appropriate rates. An over-reliance on windfall/infills and existing commitments was expressed. Similarly, concerns were raised in relation to an over reliance on a small number of strategic sites and the potential impact on delivery homes and affordable homes within the plan period.
Key themes raised in relation to Question 3 on the Preferred Strategy are set out below:

Key Theme	Summary of Points Raised
Support/ appropriate Growth Level	• Level of growth will ensure Monmouthshire continues to grow in a sustainable manner based on locally appropriate levels of development, which is compatible with Policies 1, 7 and 33 of FW 2020. Whilst it is above the 2018 based projections and past build rates of the last 5 and 10 years, a higher level of housing is only justified by the severe need to deliver affordable housing. The strategy of concentrating new growth primarily in Caldicot and the Severnside (44%) should reduce the potential to negatively impact on environmental assets and avoid adverse consequences for climate and nature emergencies. [WG] • Support quantum of growth as being sufficiently ambitious when considered against the WG 2018-based principal household projection. Level recognises that whilst Monmouthshire is not within the national growth area identified in FW 2020, the RLDP evidence base shows that the proposed level of growth is essential to deliver MCC's local evidence-based issues and ensure the RLDP is sound. [Llanover Estates, Leathdunn Ltd, Johnsey Estates, Tompkins Thomas Planning, The Coldbrook Estate, Private Individual] • New housing target appears to be a reasonable compromise and is supported. [SOUL, The Chepstow Society]
LPA Response	The 2022 Preferred Strategy growth level of 5,400 homes housing requirement and enabling the provision of up to 6,240 jobs strikes a compromise between achieving our local evidenced-based objectives that underpin the RLDP and the Welsh Government's objection to the level of growth proposed in the 2021 Preferred Strategy. This level of growth has been informed by a wide range of evidence and responded to a number of challenges that have arisen throughout the plan making process including the Welsh Government objection to the level of growth set out in the 2021 Preferred Strategy and

	phosphate water quality issues in the Rivers Wye and Usk. In October 2023, a number of post-consultation updates to the Preferred Strategy (2022) were endorsed by Council forming the basis for the level of growth set out in the Deposit Plan. These include allowing for growth in Monmouth which was previously avoided due to no phosphates solution being identified for the River Wye Catchment area and an increase in the flexibility rate from 10% to 15%. This has resulted in the housing provision figure increasing from 5,940 homes (10% flexibility) to 6,210 homes (15% flexibility). Welsh Government formally responded to the Preferred Strategy consultation in January 2023 with a 'green' rating and noting that "Future Wales places great emphasis on the development of National Growth Areas and the need for additional affordable housing. The Preferred Strategy is in general conformity with Policies 1, 7 and 33 of Future Wales and does not undermine the role of Cardiff, Newport and the Valleys as the main focus for growth and investment in the south east region, but reflects the urgent need to increase the supply of affordable housing in Monmouthshire." In this respect, the level of growth proposed has been deemed in conformity with Future Wales by Welsh Government. The Deposit Plan is considered to represent a sustainable level of growth that addresses our local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency and having regard to Welsh Government's concerns regarding alignment with Future Wales.
LPA Recommendation	In line with the October 2023 Council decision, the housing requirement remains at 5,400 homes based on a demographic-led scenario with added policy assumptions, however, the flexibility allowance is increased from 10% to 15% resulting in a housing provision figure of 6,210 homes.
Growth level is too low	• Growth level represents a significant reduction in housing provision from that justified by evidence in the previous version of the PS. Appreciate PS has been strongly influenced by WG but the current PS does not fully align with the previous evidence base. [HBF, B&DW, Vistry, Redrow Homes, B&DW Homes, Richborough Estates, Llanarth Estates, Bellway Homes, Marston's PLC, Candleston Homes, Taylor Wimpey PLC] • Approach to significantly reduce the number of homes and jobs will not address the key issues facing the County and is contrary to Soundness Tests 2 & 3. Trends such as ageing demographic, affordability, out commuting, concentration along the M4 corridor will be exacerbated. Noted that the Council is stifled by WG. [Melin Homes, Edenstone Homes, Stantonbury Building and Development Company, Tirion Homes, Candleston Homes, Sero Homes, Sero, Private Individuals x 2] • Merit in a higher growth level to address issues. [MHA, Persimmon Homes East Wales, MHA, Edenstone, Private Individuals x 2] • Plan period should be rolled forward by three years to take account of delays and consider the need for a higher provision of housing to accommodate additional plan period. [Hallam Land Management, TW, Edenstone Homes, Marston's PLC]
LPA Response	The 2022 Preferred Strategy growth level of 5,400 homes housing requirement and enabling the provision of up to 6,240 jobs strikes a compromise between achieving our local evidenced-based objectives that underpin the RLDP and the Welsh Government's objection to the level of growth proposed in the 2021 Preferred Strategy. This level of growth has been informed by a wide range of evidence and responded to a number of challenges that have arisen throughout the plan making process including the Welsh Government objection to the level of growth set out in the 2021 Preferred Strategy and phosphate water quality issues in the Rivers Wye and Usk. In October 2023, a number of post-consultation updates to the Preferred Strategy (2022) were endorsed by Council forming the basis for the level of growth set out in the Deposit Plan. These include allowing for growth in Monmouth which was previously avoided due to no phosphates solution being identified for the River Wye Catchment area and an increase in the flexibility rate from 10% to 15%. This has resulted in the housing provision figure increasing from 5,940 homes (10% flexibility) to 6,210 homes (15% flexibility). Welsh Government formally responded to the 2022 Preferred Strategy consultation in January 2023 with a 'green' rating and noting that "Future Wales places great emphasis on the development of National Growth Areas and the need for additional affordable housing. The Preferred Strategy is in general conformity with Policies 1, 7 and 33 of Future Wales and does not undermine the role of Cardiff, Newport and the Valleys as the main focus for growth and investment in the south east region, but reflects the urgent need to increase the supply of affordable housing in Monmouthshire." In this respect, the level of growth proposed has been deemed in conformity with Future Wales by Welsh Government.

	The Deposit Plan is considered to represent a sustainable level of growth that addresses our local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency and having regard to Welsh Government's concerns regarding alignment with Future Wales.
LPA Recommendation	In line with the October 2023 Council decision, the housing requirement remains at 5,400 homes based on a demographic-led scenario with added policy assumptions, however, the flexibility allowance is increased from 10% to 15% resulting in a housing provision figure of 6,210 homes.
Growth level is too high	• The level of growth is not in conformity with FW 2020 and the level of growth proposed is twice the amount for a County which has only 6% of the population of the SDP region. [Abergavenny Town Council, Abergavenny & Crickhowell FoE, Abergavenny & District Society, Cllr Christopher Edwards, Private Individuals x 7] • Growth is excessive, contrary to WG target and could lead to unsustainable and environmentally damaging levels of growth in settlement tiers. [Llanarth Fawr CC, Raglan CC, Raglan Village Action Group, Usk Civic Society, Private Individuals x 3] • Growth level is too high and cannot be accommodated within the existing infrastructure in the County. [Mathern CC, Cllr Louise Brown, Private Individuals x 6]
LPA Response	The 2022 Preferred Strategy growth level of 5,400 homes housing requirement and enabling the provision of up to 6,240 jobs strikes a compromise between achieving our local evidenced-based objectives that underpin the RLDP and the Welsh Government's objection to the level of growth proposed in the 2021 Preferred Strategy. This level of growth has been informed by a wide range of evidence and responded to a number of challenges that have arisen throughout the plan making process including the Welsh Government objection to the level of growth set out in the 2021 Preferred Strategy and phosphate water quality issues in the Rivers Wye and Usk. In October 2023, a number of post-consultation updates to the Preferred Strategy (2022) were endorsed by Council forming the basis for the level of growth set out in the Deposit Plan. These include allowing for growth in Monmouth which was previously avoided due to no phosphates solution being identified for the River Wye Catchment area and an increase in the flexibility rate from 10% to 15%. This has resulted in the housing provision figure increasing from 5,940 homes (10% flexibility) to 6,210 homes (15% flexibility). Welsh Government formally responded to the 2022 Preferred Strategy consultation in January 2023 with a 'green' rating and noting that "Future Wales places great emphasis on the development of National Growth Areas and the need for additional affordable housing. The Preferred Strategy is in general conformity with Policies 1, 7 and 33 of Future Wales and does not undermine the role of Cardiff, Newport and the Valleys as the main focus for growth and investment in the south east region but reflects the urgent need to increase the supply of affordable housing in Monmouthshire." In this respect, the level of growth proposed has been deemed in conformity with Future Wales by Welsh Government.
LPA Recommendation	In line with the October 2023 Council decision, the housing requirement remains at 5,400 homes based on a demographic-led scenario with added policy assumptions, however, the flexibility allowance is increased from 10% to 15% resulting in a housing provision figure of 6,210 homes.
Jobs Growth Figure	• Significant concerns with ability of the RLDP to meet the aspirational targets. There is a lack of robust evidence that Monmouthshire has realistic prospects of attracting 6,240 jobs. [Abergavenny Town Council, Abergavenny & Crickhowell FoE, Abergavenny & District Society, Usk Civic Society, Cllr Christopher Edwards, Private Individuals x 5] • HBF question why the level of housing proposed has been reduced by 2,966 yet the provision of new jobs has only been reduced by 975. Uncertain there will be enough homes to deliver the jobs given 50% are to be affordable. [HBF] • Generally, support the provision of 6,240 jobs, however it is vital that sufficient housing growth underpins the economic growth strategy. [Barwood Dev Securities Ltd] • Lowered jobs growth target is regrettable representing a 15% reduction. This will diminish the potential of the plan to deliver its growth objectives, including to reduce commuting. [F1 Real Est Management]

	• Working from home trend not guaranteed. [Private Individual] • Growth strategy misses the importance of agriculture in growing Monmouthshire's economy. [Our Food 1200]
LPA Response	The jobs figure contained in the RLDP is based on demographic-led modelling which is considered to be robust and includes reasonable assumptions. The associated jobs figure represents the number of jobs that could be supported by the population and housing growth planned for over the Plan period. It is recognised that it is above the baseline forecasts, however, a policy-on approach provides an appropriate basis for the RLDP to ensure that the Plan can be sufficiently flexible in respect of changing circumstances and that the County can support long term growth in accordance with Welsh Government policy, which encourages the adoption of a long term and positive strategy, and the ambitions of the CCR. Whilst it is recognised the jobs target of 416 jobs per annum is higher than some past trends, it is within the range of past performance in the County. The RLDP recognises the importance of the agricultural sector in Monmouthshire and provides a supportive policy framework to assess rural diversification and enterprise proposals that come forward. However, many agricultural processes do not require planning permission and are therefore beyond the scope of the RLDP.
LPA Recommendation	No change required.
Assumptions/Evidence	• Lack of evidence relating to a number of assumptions including migration, household membership rates and commuting ratio. No evidence to support assumptions will happen, for example young people will move into the new houses. [Abergavenny Town Council, Abergavenny & Crickhowell FoE, Private Individuals x 5] • Support the requirement for net zero ready homes and associated infrastructure to ensure the development is sustainable and well-connected. Definitions required on these terms and how they will be measured. [Abergavenny & Crickhowell FoE, Vistry, Usk Civic Society, Private Individuals] • Clear housing trajectory needed identifying the phasing and timings of sites. Selected strategic growth options should be progressed further with greater clarity including schematic diagrams and the key issues. [WG] • Higher variant of the WG 2018-based Household Projection should be used as the starting point. [Candleston Homes, Taylor Wimpey PLC] • Net zero ready requirement does not go far enough. [Cllr Christopher Edwards] • Support the 20-minute neighbourhood principle. [Private Individual]
LPA Response	The Deposit Plan sets out a more detailed policy framework and is supported by a robust and comprehensive evidence base. Relevant supporting evidence and background papers should be referred to for further information.
LPA Recommendation	Refer to the supporting evidence base for further information.
Affordable Housing	• Fully endorse the proposal for 50% affordable homes but question deliverability. [Abergavenny Town Council] • Commitment to ensure new site allocations provide 50% affordable homes is ambitious. Positive that the PS recognises that WG funding may be required to achieve target. [Llanover Estates, Leathdunn Ltd, Johnsey Estates, Vistry Group, The Coldbrook Estate, Private Individual] • What is the definition of affordable homes. [Abergavenny & Crickhowell FoE, Private Individuals x 2] • Unlikely affordable housing targets will be fulfilled based on past experience. [Private Individual, Llangybi Fawr CC, Cllr Louise Brown] • Agree with focus on delivering affordable homes. [Abergavenny Transition Town] • Viability assessments required to take account of all required costs including building regs and net zero ready requirements to demonstrate 50% is achievable. [BB3 Ltd, Manor Farm Partnership, Private Individuals x 3]

	• Should make policy provision for 100% larger affordable sites outside the settlement boundaries, but adjacent to main and secondary settlements. [BB3, Manor Farm Partnership, Private Individuals x 3] • Commitment of WG to change its policy position on the use of Social Housing Grant funding is required to achieve affordable housing targets. [Private Individual, Cllr Louise Brown, Cllr Christopher Edwards]
LPA Response	Comments noted, delivery of affordable housing continues to be a core priority of the RLDP and furthermore is a corporate priority. Viability testing has been undertaken on all of the site allocations in the Deposit RLDP. This assessment has been undertaken independently by a viability consultant on behalf of Monmouthshire County Council and provides the evidence for 50% affordable housing provision on all new site allocations. Different affordable housing thresholds are provided for other types of development and are set out in Strategic Policy S7. A definition of affordable housing is included in the Deposit RLDP. Policy H9 relates to affordable housing exception sites and lists different thresholds for proposals based on the settlement tiers identified in S2, this in turn allows for larger affordable housing exception sites adjacent to Primary Settlements than a site located adjacent a Minor Rural Settlement. Refer to Policy H9 for further detail. Issues in the way Social Housing Grant funding can be used to achieve affordable housing targets have been raised with Welsh Government, however this sits with Welsh Government and is not something within Monmouthshire's control. As noted above viability assessments have been undertaken for all allocated sites and they can achieve the 50% affordable housing figure without additional funding.
LPA Recommendation	Additional detail has been added to Strategic Policy S7 (formally S6) to provide clarity on the Councils approach to the delivery of affordable housing.
Flexibility Allowance	• Higher percentage of flexibility should be included. [HBF, Private Individuals x 2] • Support the inclusion of a flexibility allowance, but 10% should be viewed as a starting point. [Llanover Estates, Leathdunn Ltd, Johnsey Estates, Stantonbury Building & Development Company, Barwood Dev Securities Ltd, Vistry Group, Private Individual] • If growth level remains, the flexibility allowance should be increased to 25% to facilitate consumer choice and allow for allocations not being delivered, S106 agreements not being signed, and windfall and small site allowances not being achieved. [B&DW] • 20% flexibility allowance should be included to provide a contingency should some housing sites fail to deliver as per the trajectory. [Hallam Land Management, TW, Edenstone Homes, Persimmon Homes East Wales, Bellway Homes, Marston's PLC, Edenstone] • 25% flexibility allowance should be considered to address shortfall in LDP shortfall and other constraints affecting delivery. [B&DW Homes, Candlestone Homes, Taylor Wimpey PLC] • Flexibility allowance is not needed and is likely to be exploited by developers. [Private Individual, Cllr Christopher Edwards]
LPA Response	In October 2023 a report of post consultation Preferred Strategy changes was agreed by Council. An increase in the flexibility rate from 10% to 15% was one of the changes agreed. This increased the housing provision figure from 5,940 (10% flexibility) to 6,210 (15% flexibility). The change seeks to ensure that the strategic sites at Abergavenny East and Caldicot East are sufficiently large to deliver the required infrastructure whilst also allowing for the allocation of a handful of smaller sites across the County to sustain and enhance existing communities. Increasing the flexibility ensures that the plan is more robust and resilient as there is delivery in the short-term term while the large strategic sites take time to be developed out. An increased flexibility will result in the Plan being able to provide a range and choice of sites and ensure that the plan is not solely reliant on the delivery of larger strategic sites which are more complicated to develop. A range of smaller sites will ensure the delivery of much needed affordable housing after the adoption of the plan to start addressing this current unmet affordable housing need.

LPA Recommendation	Incorporate a 15% flexibility allowance in the Deposit Plan as agreed by Council in October 2023.
Existing Commitments	• Removal of previous allocations which have either stalled or are not supported by sufficient evidence to demonstrate delivery is a prudent approach. [WG] • Viability of existing commitments and likelihood of delivery during the next plan period is questioned. [BB3 Ltd, Manor Farm Partnership, Tirion Homes, Sero Homes, Private Individuals x 3] • Impact on deliverability has not been adequately considered. Suggest applying a non-delivery allowance. [Persimmon Homes, Grove Farm Estates] • Welcome the decision to not rollover historic housing allocations. [Grove Farm Estates]
LPA Response	In line with the Development Plans Manual (DPM) a non-delivery allowance has been applied to the existing commitments element of the housing supply components. The DPM allows for two approaches to this; either as a percentage across the overall land bank or sites can be discounted individually. Given the relatively small number of sites involved and based on Officer knowledge of sites, it has been decided to discount 4 sites which it is considered that there is insufficient information to demonstrate that they will come forward during the Plan period. Further details can be found in the Housing Background Paper.
LPA Recommendation	No change required.
Windfall/ Small Sites Allowance	• Windfall allowance is unrealistic and contrary to the AMR which argues a reduction in forecasted windfall sites completions. Suggest re-evaluating the windfall allowance. [Persimmon Homes East Wales] • Concerned by the windfall and small site allowance. Appreciate it is based on past trends, but this should be reviewed given phosphates and the current economic climate. [Grove Farm Estates] • Whilst it is reasonable to expect windfall sites to continue to contribute to supply, there is a risk that relying too heavily on past trends could lead to an overestimation of their contribution over the new plan period. Significant shift in national planning policy, placing stronger emphasis on the plan led approach making it more difficult to bring forward sites that are not existing allocations. [Richborough Estates]
LPA Response	The Housing Background Paper sets out the approach taken to windfall allowances in the preparation of the Deposit Plan. As with the Preferred Strategy, the Deposit Plan includes a windfall allowance based on the findings of the Housing Potential Study. This contributes approximately 230 units to the housing figures, less than an allowance based on past trends, which would contribute 366 homes to the housing figures. In this respect, a conservative approach to windfall provision has been taken. Similarly, a reduced contribution has been factored in for infill developments. The past trend rate of infill developments has been reduced by 15% to reflect the plan-led system and infill opportunities reducing.
LPA Recommendation	In accordance with details set out in the Housing Background Paper, base windfall allowances on the findings of the Housing Potential Study and the infill allowance on a reduced past trend rate (15% reduction).
Strategic Sites	• There should be less resilience on strategic sites and more smaller sites allocated throughout the County. [Private Individual] • PS does not provide a strategy that will increase the delivery of market and affordable housing due to its suppressed housing requirement and over reliance on a single large strategic site. [Vistry] • Provision should be made specifically for the older population. [Grove Farm Estates, Private Individual]

LPA Response	The Deposit Plan allocates 18 residential/mixed use sites. Whilst it is recognised that two of the strategic sites (HA1 – Land to the East of Abergavenny and HA2 – Land to the East of Caldicot) account for 1,270 homes, there are a further 16 residential allocations ranging in size from 15 units to 270 units contributing to housing delivery in the County. Furthermore, in October 2023 a report of post consultation Preferred Strategy changes was agreed by Council. An increase in the flexibility rate from 10% to 15% was one of the changes agreed. This increased the housing provision figure from 5,940 (10% flexibility) to 6,210 (15% flexibility). The change seeks to ensure that the strategic sites at Abergavenny East and Caldicot East are sufficiently large to deliver the required infrastructure whilst also allowing for the allocation of a handful of smaller sites across the County to sustain and enhance existing communities. Increasing the flexibility ensures that the plan is more robust and resilient as there is delivery in the short-term term while the large strategic sites take time to be developed out. An increased flexibility will result in the Plan being able to provide a range and choice of sites and ensure that the plan is not solely reliant on the delivery of larger strategic sites which are more complicated to develop. A range of smaller sites will ensure the delivery of much needed affordable housing after the adoption of the plan to start addressing this current unmet affordable housing need. A housing trajectory has been prepared as part of the Deposit Plan, which demonstrates housing delivery rates throughout the Plan period can be achieved. The level of growth set out in the Preferred Strategy (2022) was informed by a wide range of evidence and responded to a number of challenges that had arisen throughout the plan making process including the Welsh Government objection to the level of growth set out in the 2021 Preferred Strategy and phosphate water quality issues in the Rivers Wye and Usk. The Deposit Plan is considered to represent a sustainable level of growth that addresses our local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency and having regard to Welsh Government's concerns regarding alignment with Future Wales. The Deposit Plan provides the policy framework to allow for the consideration of specialist housing to come forward throughout the Plan period (Policy H7 – Specialist Housing), which includes the housing requirements of older people.
LPA Recommendation	No change required.
Phosphates	• Uncertainty surrounding the timescales of resolving phosphate constraints which will have impacts on the allocation of candidate sites. [Abergavenny Town Council]
LPA Response	Since the phosphate guidance was introduced by NRW, Monmouthshire County Council has been working collaboratively with a range of organisations including NRW, Dŵr Cymru Welsh Water (DCWW), Welsh Government, other Councils in Wales and England, environmental groups, developers, farmers and other stakeholders to establish solutions that will ensure that development proposals do not have an adverse impact on water quality within the SAC rivers.
LPA Recommendation	Continue to liaise with the relevant organisations on phosphate matters.
Monmouth	• An early review of the Plan should be scheduled to take account of the potentially changing circumstances with the phosphate issue in Monmouth. [BB3, Richard Willett, Manor Farm Partnership, Private Individuals x 2] • Agree land should be safeguarded in Monmouth and treated as windfall sites. This would allow for development in Monmouth should the phosphates situation change. [BB3, Manor Farm Partnership, Private Individuals x 3] • Lack of housing in the north of the County results in the RLDP being unsound. [Hallam Land Management, TW, Edenstone Homes, Bellway Homes]

LPA Response	The Preferred Strategy (2022) proposed no new site allocations in Monmouth, or within the upper River Wye catchment north of Bigsweir Bridge and also assumed no existing planning permissions or small/windfall sites could come forward. This approach was taken due to the lack of an identified strategic solution to the treatment of phosphates at the Monmouth Wastewater Treatment Works (WwTW) within the Plan period. Welsh Government's response letter to the 2022 Preferred Strategy advised that new site allocations should be made in Monmouth on the basis that sufficient certainty is provided by DCWW's planned improvements at the Monmouth Wastewater Treatment Works by 31st March 2025. Following Welsh Government's confidence in the removal of this constraint, Council agreed in October 2023 to the identification of a strategic site in Monmouth as well as including allowances towards windfall and infill allowances and existing commitments already with planning permission.
LPA Recommendation	In accordance with the October 2023 Council, the Deposit Plan allows for growth in Monmouth.
General	• Reference should be made to Objective 5 – Minerals and Waste and Objective 14 – Infrastructure in relation to Policy S1. [MPA] • Statements regarding net-zero ready homes do not go far enough. [Private Individual] • Working from home assumptions should not be relied upon. [Private Individual, Usk Civic Society] • Focus is on house building rather than creating places. [Private Individual] • Preservation of green belt sites should be top priority of the Council. [Private Individual]
LPA Response	In the interest of brevity, the RLDP objectives listed in the Links to Wider Framework box are those that are considered to be most pertinent to the policy in question, however, most RLDP objectives are linked to every policy some way. It is not considered necessary to list all objectives in relation to each policy. Further clarification on the policy approach to net zero homes is set out in the Deposit Plan in Policy NZ1 – Monmouthshire Net Zero Carbon Homes and associated the supporting evidence. Working from home assumptions are not relied upon, but the Plan does recognise the change in working patterns. A key focus of the Deposit Plan is establishing placemaking principles to be implemented through development on the ground. There is an extensive policy framework setting out the Council's policy approach including policies Strategic S3 – Sustainable Placemaking & High Quality Design, PM1 – Creating Well Designed Places, Strategic Policy S8 – Site Allocation Placemaking Principles and site specific allocation polices. The spatial strategy has regard to Policy 34 and the indicative Green Belt boundary. Monmouthshire's primary settlements fall outside of the indicative Green Belt boundary. National planning policy allows for extensions to existing settlements within and adjoining the Green Belt of appropriate scale having regard to the identified and longer-term need for development land, the effects of development pressures in areas beyond Green Belt, the need to minimise demand travel, and the purpose of the overall greenbelt designation. It states that this may require land to be safeguarded and boundaries of proposed Green Belts must be carefully defined to achieve this.
LPA Recommendation	No change required.
Cross Boundary Issues	• Torfaen CBC interested in continued collaboration in developing work. [Torfaen CBC] • PS does not reference any dialogue with other authorities regarding strategic housing sites, as required by FW2020. [Abergavenny & Crickhowell FoE] • While the PS is considered to be in general conformity with FW 2020, further technical work is required to demonstrate the plan has met the tests of soundness in terms of collaboration with neighbouring authorities and growth in terms of jobs and homes. [WG]

LPA Response	The Council has, and continues to work collaboratively with our neighbouring authorities and the wider South East Eales region and English border authorities in preparing our respective LDPs which enables consideration of cross border issues, including levels of growth and the spatial distribution of development. At the regional level, collaboration between the 10 LPAs in South East Wales takes place via various regional groups including South East Wales Strategic Planning Group (SEWSPG), South East Wales Planning Officer Society (SEWPOS) and South Wales Regional Aggregates Working Party (SWRARWP). Through SEWSPG the LPAs work collaboratively on the preparation of a joint evidence base to inform RLDPs and the emerging SDP.
LPA Recommendation	No change required.
Sites promoted in response to question 3	• BB3 Ltd – CS0278 – West of Raglan [BB3 Ltd] • Leathdunn Ltd – CS0036 – West of B4293, Devauden [Leathdunn Ltd] • Johnsey Estates – CS0247 – Cooper III [Johnsey Estates] • Manor Farm Partnership - CS0278 – West of Raglan [Manor Farm Partnership] • Johnsey Estates Ltd – CS0113 – Castle Oaks (Site D) [Johnsey Estates Ltd] • Johnsey Estates Ltd – CS0282 – NW Burrium Gate [Johnsey Estates Ltd] • Edenstone – CS0205 – Land at Usk Road, Raglan [Edenstone]
LPA Response	Candidate site submissions have been considered as part of the candidate site assessment. Individual site recommendations can be viewed in Candidate Site Assessment Report.
LPA Recommendation	See the Candidate Site Assessment Report for Candidate Site recommendations.

Question 4 – Do you have any comments on Strategic Policy S2 Spatial Distribution of Development – Settlement Hierarchy?

113 organisations or members of the public submitted a response to question 4.

Given the overlap with the Preferred Strategy and the policy content of S1 – Growth Strategy and S2 – Spatial Distribution, there are similarities in the answers given to consultation questions 2, 3 & 4. A range of comments have been made on the Preferred Strategy, with some representors in broad support, others suggesting the Strategy is not ambitious enough and other suggesting it is too high. There was a recognition on both sides that the Preferred Strategy represents a compromised approach to addressing the County's issues and challenges whilst also addressing Welsh Government's objections to the previous Preferred Strategy (2021).

General support given to the distribution of growth, focused on the Primary Settlements, however, more evenly dispersed growth across settlements, including Monmouth and lower tiers was raised. Concern was raised at the level of growth focussed in the south of the County.

In terms of the housing supply components, the consensus is that the flexibility allowance is too low with a 20% or 25% flexibility allowance suggested as more appropriate rates. An over-reliance on windfall/infills and existing commitments was expressed. Similarly, concerns were raised in relation to an over reliance on a small number of strategic sites and the potential impact on delivery homes and affordable homes within the plan period.

Comments relating to specific candidate sites have not been included here and are dealt with via the candidate site assessment process.

Key themes raised in relation to Question 4 on the Preferred Strategy are set out below:

Key Theme	Summary of Points Raised
Primary Settlements	• Support proportionate distribution of growth and advise that larger infrastructure is generally located in the more urbanised Primary Settlements, and it is these locations where there tends to be fewer capacity restrictions. [Dwr Cymru] • Support settlement hierarchy and focus of growth on the Primary settlements of either Abergavenny, Caldicot or Chepstow. [B&DW, Abergavenny & Crickhowell FoE, Johnsey Estates, Edenstone Homes, Grove Farm Estates & Development, Redrow Homes, Richborough Estates, Bellway Homes, Candleston Homes, Taylor Wimpey PLC, Private Individual] • WG does not object to the settlement hierarchy and distribution of housing growth. [WG] • Do not support growth of more than 20% for Abergavenny [SOUL, Private Individual]
LPA Response	Support for the distribution of growth is welcomed. The Deposit Plan identifies 22% of housing growth is to be accommodated in Abergavenny. As one of Monmouthshire's Primary Settlements this is considered to be an acceptable proportion of growth.
LPA Recommendation	No changes to the Settlement Hierarchy required, however, update Policy S2 to include housing and employment monitoring data up to the 1st April 2024 base date; to reflect growth will now be allowed in the River Wye Catchment area following Dwr Cymru Welsh Water investment and Welsh Government advice and increases in the flexibility rate from 10% to 15%.
South of County	• Recommend that a higher level of development is achievable in the south of the County. [Abergavenny Town Council] • South is more likely to achieve balance of homes and jobs, with limited phosphate impacts. [Abergavenny & District Civic Society] • Concerned that 44% of growth is focussed on the south of the County. More balanced and evenly distribution of new homes should be considered. [Melin Homes, MHA, Persimmon Homes, Frances Taylor, Llanarth Estates, Stantonbury Building and Development Company, Cllr Louise Brown, Tirion Homes, Sero Homes, Sero, Private Individuals x 12] • Growth in Severnside – potential implications for not increasing proportionately private car trips or best and most versatile land will need to be demonstrated by deposit stage. [WG] • Needs to be an integrated approach to the environment, the scale of development and the provision of infrastructure in Chepstow. Over development of Chepstow will destroy the "green" surroundings of Chepstow. Infrastructure is at capacity. [The Chepstow Society, Private Individuals x 13] • Support further growth in Chepstow. Despite being identified as a primary settlement it has significantly less growth than Abergavenny and Severnside. [Barwood Development Securities Limited] • Given 44% of housing growth in Caldicot there is a case to support employment growth commensurate to the housing growth in Caldicot. [F1 Real Estate] • Support further proportionate growth in Magor. [Edenstone] • Proposed level of growth around Portskewett will overwhelm the village. [Private Individual]
LPA Response	Support for spatial distribution of growth is welcomed. The Settlement Hierarchy set out in Policy S2 reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. The SSA confirms the dominant role of the primary settlements of Abergavenny, Chepstow, Caldicot and Monmouth, with this reflected in 85% of the level of housing growth proposed in these settlements. Spatially, the growth is considered to be well distributed throughout the County to help address affordability issues across Monmouthshire. The southern settlements of Chepstow and Caldicot account for 48% of the housing growth proposed and the northern primary settlements of Abergavenny

	and Monmouth account of 37%. It is recognised that Caldicot and the Severnside cluster account for 35% of housing growth, however, Welsh Government acknowledge the strong functional linkage with Newport, Cardiff and Bristol and "the concentration of new growth primarily in Caldicot and the Severnside area should reduce the potential to negatively impact on environmental assets and avoid consequences for climate and nature emergencies". Overall, the spatial strategy and identification of suitable sites for allocation is considered appropriate and reflect the site search sequence outlined in national planning policy.
LPA Recommendation	No changes to the Settlement Hierarchy required, however, update Policy S2 to include housing and employment monitoring data up to the 1st April 2024 base date; to reflect growth will now be allowed in the River Wye Catchment area following Dwr Cymru Welsh Water investment and Welsh Government advice and increases in the flexibility rate from 10% to 15%.
Infrastructure	• Dwr Cymru serve each of the Tier 1 – 4 settlements listed with a clean water supply, and all settlements listed aside from Llanvair Discoed and Penallt with a public sewerage system. Combination of reinforcement works through the Capital Investment Programme and developer contributions will ensure growth can be delivered. Further developments in Goytre and Usk and Dingestow, Little Mill, Tintern, Trellech and Pansy may need to be delayed until such time that there has been a future capital investment AMP scheme, or is developer funded. [Dwr Cymru] • Spatial distribution strategy is speculation without more information on viability and capacity for settlements' infrastructure to absorb growth. [Abergavenny Town Council]
LPA Response	Dwr Cymru Welsh Water comments are reflected in the site allocation policies and delivery trajectories. We welcome ongoing dialogue with Dwr Cymru as the plan progresses. Further details on infrastructure delivery arrangements are set out in the Infrastructure Delivery Plan.
LPA Recommendation	No change required.
Phosphates	• From a river quality perspective, only Raglan WwTW has phosphorous removal. Schemes to introduce phosphorus removal at Llanfoist and Monmouth WwTWs have been announced and are expected to be delivered before the end of 2025. Llanarth WwTW will also see a phosphate permit introduced by the end of AMP7. NRW are in the process of undertaking a review of existing WwTW permits, and once completed we will work with NRW to determine whether any further WwTWs require phosphorous removal to be introduced. [Dwr Cymru] • Question the proposed timescale for addressing the issues of phosphate treatment for Abergavenny and the impact it will have on delaying the delivery of the RLDP. [Abergavenny Town Council, Abergavenny & Crickhowell FoE] • On the basis that improvement to both the Monmouth and Llanfoist treatment works to remove phosphates are planned it is appropriate to identify new affordable housing led allocations in both Monmouth and Abergavenny. [WG] • Concerns over the lack of certainty regarding the improvement works at Llanfoist WwTW. Satisfied that the approach for the Upper River Wye catchment if sufficiently precautionary. [NRW]
LPA Response	The Council has been working collaboratively with a range of organisations including NRW, Dŵr Cymru Welsh Water (DCWW), Welsh Government, other Councils in Wales and England, environmental groups, developers, farmers and other stakeholders to establish solutions that will ensure that development proposals do not have an adverse impact on water quality within the SAC rivers. The spatial strategy and site allocations have been prepared with regard to Dwr Cymru's planned improvements to waste water treatment works and NRW's review of permits. There is commitment from DCWW to provide phosphate mitigation at the Llanfoist and Monmouth WwTWs and NRW's review of all permits and water quality to establish what capacity (if any) exists to enable development proposals to come forward while ensuring betterment or neutrality of phosphate levels has provided the necessary confidence to support the RLDP strategy.

LPA Recommendation	Continue to liaise with the relevant organisations in relation to phosphate issues.
Cross Boundary Issues	• Impact on PS on transport carbon emissions and capacity of development allocated at Chepstow to identify, fund, and mitigate development impacts on transport demand will need to be assessed in detail. Need to take account of the proposed development within the FoD Local Plan where it closely juxtaposes with Monmouthshire. [Gloucestershire CC, The Chepstow Society] • Need to understand the regional picture and context in relation to housing growth [Torfaen CBC] • No account appears to have been taken of the development and traffic from the continuing expansion of Gloucestershire. [Private Individual]
LPA Response	The Council has, and continues to work collaboratively with our neighbouring authorities and the wider South East Eales region and English border authorities in preparing our respective LDPs which enables consideration of cross border issues, including levels of growth and the spatial distribution of development. At the regional level, collaboration between the 10 LPAs in South East Wales takes place via various regional groups including South East Wales Strategic Planning Group (SEWSPG), South East Wales Planning Officer Society (SEWPOS) and South Wales Regional Aggregates Working Party (SWRARWP). Through SEWSPG the LPAs work collaboratively on the preparation of a joint evidence base to inform RLDPs and the emerging SDP.
LPA Recommendation	No change required.
Infill	• S2 should be reworded from 'minor infilling between existing buildings' to 'filling in a small gap between existing dwellings. [Llanarth CC, Raglan CC, Private Individual]
LPA Response	There may instances where infilling between existing buildings that are not dwellings will be acceptable.
LPA Recommendation	No change required.
Secondary Settlements	• Objection to the RSS figure being indicative with potential to accommodate growth from each of the settlements in either Raglan Penperlleni and Usk. [Raglan CC, Raglan Village Action Group, Usk Civic Society] • There should be no significant expansion of RSS. [Private Individuals x 3] • RLDP should look to maximise development at Raglan. [BB3 Ltd, Manor Farm Partnership, Richborough Estates, Edenstone, Private Individuals x 3] • Usk is ranked 5th out of all the settlements in Monmouthshire and its proportion of growth should recognise this. [Private Individual, Johnsey Estates] • Penperlleni can accommodate growth. [B&DW]
LPA Response	The Deposit Plan sets out the level of growth to be accommodated in the Secondary Settlements (Tier 2). Collectively the settlements of Penperlleni, Raglan and Usk will contribute 6% of housing growth and 8% employment growth. This is considered to be an acceptable and proportionate level of growth given the settlements position in the settlement hierarchy as tier 2 settlements, reflecting the findings of the Sustainable Settlement Appraisal (SSA). Further details of the methodology can be found in the Sustainable Settlement Appraisal.
LPA Recommendation	No change required.
SSA	• Population figure given for Gwehelog appears implausible. [Raglan CC] • SSA is flawed in its methodology as only says if infrastructure exists, not if there is capacity in the infrastructure. [Private Individuals x 3]

	• Question whether Caldicot and Severnside be grouped as a cluster. Term Severnside should not be used. [Private Individuals x 3] • SSA makes no reference to how proposed infrastructure could potentially enhance the sustainability of settlements. [Edenstone] • SSA is flawed in its assessment of Chepstow. [Cllr Christopher Edwards]
LPA Response	The methodology used for the Sustainable Settlement Appraisal (SSA) is based on the approach set out in the draft South East Wales Strategic Planning (SEWSPG) Pathfinder Group Sustainable Settlement Appraisal Paper, with some amendments for local considerations. The methodology has regard to the Development Plans Manual and provides a basis for regional consistency and is therefore considered to be an acceptable basis for the RLDP settlement hierarchy. In accordance with Planning Policy Wales 12, the methodology allows for clusters of smaller settlements where a sustainable functional linkage can be demonstrated, to be designated as the preferred locations for most new development including housing and employment provision. The criteria used for identifying clusters is set out in section 4 and 10 of the SSA. The cluster analysis recognises that some of the lower tier settlements have a strong geographical and functional relationship with a Tier 1 (Primary Settlement). The settlements along the M4 corridor in particular exhibit strong geographical and functional relationships and have formed a cluster linked to the primary (tier 1) settlement of Caldicot. This approach is consistent with the methodology and PPW12. Infrastructure enhancements details are set out in the Infrastructure Delivery Plan. The population figures contained within the SSA are taken from the 2021 Census. Up to date official population figures for each settlement are not available at the lower geographical scale. For the purposes of the appraisal, population figures for the smaller settlements are derived from best possible estimates using counts of dwellings which fall within the development boundary of a settlement, as defined in the Adopted LDP, where this exists, or counts of dwellings which make up a nucleus of a settlement. The average household size figure from the 2021 Census for the output area in which the settlement is located has then been applied to the dwelling count.
LPA Recommendation	No change required.
Monmouth	• HBF concerned at the approach taken to Monmouth and believe a solution will be available within the Plan period. [HBF] • Highly likely a phosphate solution will be provided to allow the release of development in Monmouth in the short term. Therefore, development should be allocated in Monmouth. Plan is unsound otherwise. [Hallam Land Management, Taylor Wimpey, Redrow Homes, Richborough Estates, SOUL, Cllr Louise Brown, Vistry Group, Edenstone] • Concerned if Monmouth 'bonus sites' come forward that will increase the overall housing provision. [Private Individual] • Approach to treat Monmouth sites as 'bonus sites' is sensible. [Taylor Wimpey, Private Individual]
LPA Response	The Preferred Strategy (2022) proposed no new site allocations in Monmouth, or within the upper River Wye catchment north of Bigsweir Bridge and also assumed no existing planning permissions or small/windfall sites could come forward. This approach was taken due to the lack of an identified strategic solution to the treatment of phosphates at the Monmouth Wastewater Treatment Works (WwTW) within the Plan period. Welsh Government's response letter to the 2022 Preferred Strategy advised that new site allocations should be made in Monmouth on the basis that sufficient certainty is provided by DCWW's planned improvements at the Monmouth Wastewater Treatment Works by 31st March 2025. Following Welsh Government's confidence in the removal of this constraint, Council agreed in October 2023 to the identification of a strategic site in Monmouth as well as including allowances towards windfall and infill allowances and existing commitments already with planning permission.
LPA Recommendation	In accordance with the October 2023 Council Report, the Deposit Plan allows for growth in Monmouth.

Main Rural Settlements	• Question the level of growth attributed to Tier 3 settlements. Previous plan took a similar approach and failed to deliver. Requirement to deliver 50% affordable homes on these sites is likely to make delivery of these smaller sites less likely. [HBF, B&DW] • Support distribution of growth according to the settlement hierarchy, however greater value should be placed on the Main Rural Settlements to accommodate growth. [Llanover Estates, Leathdunn Ltd, Marston's PLC, The Coldbrook Estate] • Little Mill should be higher placed in the hierarchy recognising its functional link to larger settlements and underscoring as part of the SSA. [MHA] • There should be no significant expansion of the rural settlements. [Private Individuals x 2] • Deposit plan should identify the number of new homes proposed in Tier 3. [WG] • Trellech – until or unless the WwTW is upgraded and capacity adequately increased, do not consider the area has the infrastructure necessary to accommodate further development. [NRW] • RLDP should maximise site allocations in Main Rural Settlements. [BB3 Ltd, Manor Farm Partnership, Private Individuals x 3] • Scale of growth in Main and Minor Rural Settlements conflicts with net-zero aims. [Llangybi Fawr CC, Private Individual] • Growth is focussed in the wrong locations and should be dispersed across a wider area to address affordability. [Private Individual] • Llangybi should not be categorised as a suitable rural settlement for future growth. [Private Individual, Llangybi Fawr CC] • Object to Llanvair Discoed being identified as a Main Village as the infrastructure and services are not sufficient to cope with new development. [Private Individual]
LPA Response	The Settlement Hierarchy set out in Policy S2 reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. Spatially, the growth is considered to be well distributed throughout the County to help address affordability issues across Monmouthshire. Collectively, Tier 3 (Main Rural Settlements) and Tier 4 (Minor Rural Settlements) account for 9% of the County's housing growth including new allocations, windfall and infill allowances and completions between 2018 – 2024. New allocations are only proposed in Tier 3 settlements (Main Rural) reflecting their position in the settlement hierarchy and account for 113 homes over six new allocations and 15 homes within an LDP Rollover site. Any growth in Tier 4 settlements (Minor Rural Settlements) is from any completions that have taken place between 2018 – 2024 and estimated contribution to infill developments based on past trends. This is considered to be an acceptable level of growth in our most sustainable lower tier settlements to deliver much needed affordable homes and to address rural inequality and rural isolation in these areas. Site specific allocations and the tier they are situated in is set out in policies HA1 – HA18, along with a summary of the spatial distribution of housing provision in Table 2 of the Deposit Plan. Further details on the housing figures are also set out in the Housing Background Paper. There are no new allocations proposed in Trellech and any infill/windfall proposals that come forward would be subject to consideration of the RLDP policy framework and standard Development Management consultations.
LPA Recommendation	No changes to the Settlement Hierarchy required, however, update Policy S2 to include housing and employment monitoring data up to the 1st April 2024 base date, changes to reflect growth will now be allowed in the River Wye Catchment area following Dwr Cymru Welsh Water investment and Welsh Government advice and increases in the flexibility rate from 10% to 15%.
Minor Rural Settlements	• Question the level of growth attributed to Tier 4 settlements. Previous plan took a similar approach and failed to deliver. Requirement to deliver 50% affordable homes on these sites is likely to make delivery of these smaller sites less likely. [HBF, B&DW] • There should be no significant expansion of the rural settlements. [Private Individuals x 2]. • Deposit plan should identify the number of new homes proposed in Tier 4. [WG] • RLDP should maximise site allocations in Minor Rural Settlements. [BB3 Ltd, Manor Farm Partnership, Private Individuals x 3]

LPA Response	The Settlement Hierarchy set out in Policy S2 reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. Spatially, the growth is considered to be well distributed throughout the County to help address affordability issues across Monmouthshire. Collectively, Tier 3 (Main Rural Settlements) and Tier 4 (Minor Rural Settlements) account for 9% of the County's housing growth including new allocations, windfall and infill allowances and completions between 2018 – 2024. New allocations are only proposed in Tier 3 settlements (Main Rural) reflecting their position in the settlement hierarchy and account for 113 homes over six new allocations and 15 homes within an LDP Rollover site. Any growth in Tier 4 settlements (Minor Rural Settlements) is from any completions that have taken place between 2018 – 2024 and estimated contribution to infill developments based on past trends. There are no new allocations proposed for Tier 4 settlements. This is considered to be an acceptable level of growth in our most sustainable lower tier settlements to deliver much needed affordable homes and to address rural inequality and rural isolation in these areas. Site specific allocations and the tier they are situated in is set out in policies HA1 – HA18, along with a summary of the spatial distribution of housing provision in Table 2 of the Deposit Plan. Further details on the housing figures are also set out in the Housing Background Paper.
LPA Recommendation	No changes to the Settlement Hierarchy required, however, update Policy S2 to include housing and employment monitoring data up to the 1st April 2024 base date, changes to reflect growth will now be allowed in the River Wye Catchment area following Dwr Cymru Welsh Water investment and Welsh Government advice and increases in the flexibility rate from 10% to 15%.
Uncertainties	• Decisions yet to be made on viability and need for candidate sites. Difficult to comment on spatial distribution without knowing where the sites will be and if they are suitable. [Abergavenny Transition Town]
LPA Response	The level of information contained in the Preferred Strategy was appropriate for that stage in the Plan process. The Deposit Plan sets out the detailed policies and site allocations.
LPA Recommendation	No change required.
Windfalls/Infill sites	• Too much reliance on windfall sites. This should be redistributed. [Llanover Estates, Richborough Estates, Vistry Group, The Coldbrook Estate] • Support the HPS approach to windfalls, however, this should be further reduced by 50%. [B&DW] • Rural small site reduction of 20% should be applied to the whole of the small site allowance. [B&DW, Candleston Homes] • Important to draw settlement boundaries to allow for flexible growth. [Tompkins Thomas Planning]
LPA Response	The Housing Background Paper sets out the approach taken to windfall allowances in the preparation of the Deposit Plan. As with the Preferred Strategy, the Deposit Plan includes a windfall allowance based on the findings of the Housing Potential Study. This contributes approximately 230 units to the housing figures, less than an allowance based on past trends, which would contribute 366 homes to the housing figures. In this respect, a conservative approach to windfall provision has been taken. Similarly, a reduced contribution has been factored in for infill developments. The past trend rate of infill developments has been reduced by 15% to reflect the plan-led system and infill opportunities reducing.
LPA Recommendation	In accordance with details set out in the Housing Background Paper, base windfall allowances on the findings of the Housing Potential Study and the infill allowance on a reduced past trend rate.
Existing Commitments	• Sites that cannot demonstrate deliverability should be removed from the process. [Melin Homes, Vistry, Llanarth Estates, Candleston Homes, Sero Homes, Sero, Private Individuals x 2] • Non-delivery allowance of 20% should be applied to existing commitments. [Redrow Homes, B&DW, Candleston Homes, Taylor Wimpey]

LPA Response	The ability to demonstrate deliverability and viability has formed an integral part of the candidate site assessment process, with sites removed from the process where insufficient evidence has been provided. In line with the Development Plans Manual (DPM) a non-delivery allowance has been applied to the existing commitments element of the housing supply components. The DPM allows for two approaches to this; either as a percentage across the overall land bank or sites can be discounted individually. Given the relatively small number of sites involved and based on Officer knowledge of sites, it has been decided to discount 4 sites which it is considered that there is insufficient information to demonstrate that they will come forward during the Plan period. Further details can be found in the Housing Background Paper.
LPA Recommendation	No change required.
Strategic Sites	• Delivery of Caldicot East site is ambitious within the remaining plan period. Additional allocations elsewhere would de-risk the plan. [Llanover Estates, Vistry, The Coldbrook Estate] • Concerns regarding the size and provision of Abergavenny East. Advise further consideration is given to allocating a smaller allocation to provide range and choice and deliverable allocations. [Edenstone Homes, Bellway Homes, Tompkins Thomas Planning] • Concentration of strategic sites is a high-risk strategy. Range of smaller sites to help mitigate against any delay associated with larger more complex strategic sites should be considered. [Redrow Homes, Private Individuals x 2]
LPA Response	The Deposit Plan allocates 18 residential/mixed use sites. Whilst it is recognised that two of the strategic sites (HA1 – Land to the East of Abergavenny and HA2 – Land to the East of Caldicot) account for 1,270 homes, there are a further 16 residential allocations ranging in size from 15 units to 270 units contributing to housing delivery in the County. Furthermore, in October 2023 a report of post consultation Preferred Strategy changes was agreed by Council. An increase in the flexibility rate from 10% to 15% was one of the changes agreed. This increased the housing provision figure from 5,940 (10% flexibility) to 6,210 (15% flexibility). The change seeks to ensure that the strategic sites at Abergavenny East and Caldicot East are sufficiently large to deliver the required infrastructure whilst also allowing for the allocation of a handful of smaller sites across the County to sustain and enhance existing communities. Increasing the flexibility ensures that the plan is more robust and resilient as there is delivery in the short-term term while the large strategic sites take time to be developed out. An increased flexibility will result in the Plan being able to provide a range and choice of sites and ensure that the plan is not solely reliant on the delivery of larger strategic sites which are more complicated to develop. A range of smaller sites will ensure the delivery of much needed affordable housing after the adoption of the plan to start addressing this current unmet affordable housing need. A housing trajectory has been prepared as part of the Deposit Plan, which demonstrates housing delivery rates throughout the Plan period can be achieved.
LPA Recommendation	No change required.
New Settlement	• Disappointed that a new settlement solution has been deferred for consideration through the SDP. [Melin Homes, Redrow Homes, Llanarth Estates, Tirion Homes, Candleston Homes, Sero Homes, Sero, Private Individuals x 2]
LPA Response	Paragraph 3.53 of PPW12 states that “due to their strategic nature new settlements should only be proposed as part of a joint LDP, an SDP or Future Wales. This is due to their significance and impacts extending beyond a single local authority.”
LPA Recommendation	No change required.

General	• Specifically allowing Gypsy and Traveller sites outside of tiers 1 to 4 is illegal discrimination. All locations should be available. [Private Individual] • Provision of affordable housing should be influenced by the availability of local employment. [Private Individual] • How will Council ensure that the employment land allocated brings forward suitable jobs? [Private Individual] • Green wedge designations should be considered early in the process. [Private Individual] • FW2040 notes large scale projects should consider District Heat Networks. [Private Individual] • Need to recognise brownfield sites in non-rural isolated locations concerning rural economies. [Private Individual] • Sewerage infrastructure is inadequate and needs upgrading before more houses are built to avoid further deterioration of water quality in rivers. [Private Individual] • Providing a commensurate amount of employment land to housing does not ensure the creation/relocation of businesses. [Private Individual] • Too much focus on house building rather than creating nice places to live. [Private Individual] • Spatial relationship between settlements outside of Tier 4 and their purpose to food production should be discussed. [Our Food 1200]
LPA Response	All locations included Tiers 1 – 4 and outside of the Settlement Tiers are available for consideration for Gypsy and Traveller sites subject to satisfying the detailed policy framework of the RLDP. In accordance with national guidance the provision of affordable housing is linked to the evidence base set out in the Local Housing Market Assessment. The RLDP does, however, seek to achieve a balance between the provision of homes and employment opportunities. The Green Wedge Assessment has informed the designation of green wedges throughout the County and has been considered as part of the site selection process. Consideration for District Heat Network opportunities has been undertaken as part of the Monmouthshire Renewable and Low Carbon Energy Assessment (October 2020), which identified limited potential for district heat networks. However, the Council has introduced policy requirements for dwellings to be built to net zero carbon standards, including the incorporation of renewable energy generation technologies and a specific requirement to not connect to the gas network (NZ1 – Monmouthshire Net Zero Carbon Homes and Strategic Policy S8 – Site Allocation Placemaking Principles). The RLDP seeks to support economic growth through the inclusion of an overarching strategy and potential jobs growth figure that could be supported by the population and housing growth planned over the Plan period. The RLDP will seeks to achieve this through the allocation of a range of B use class employment sites and a supportive policy framework for jobs that will be delivered other sectors such as tourism, leisure food, retail and agriculture. It is recognised that the RLDP is only one mechanism for delivering on economic growth. The Economy, Employment and Skills Strategy (EESS) sets out the Council's direction of travel and action plan for achieving economic growth. In accordance with national guidance, the RLDP allows for consideration of rural enterprise dwellings outside of Tier 1 – 4 settlements. Similarly, brownfield development opportunities outside of defined settlement boundaries would be considered on their merits and assessed against the RLDP policy framework. The RLDP has been prepared in consultation with Dwr Cymru Welsh Water, NRW and other relevant organisations to follow the relevant guidance and delivery programme to the phosphates issue.
LPA Recommendation	No change required.
Sites Promoted in response to question 4	• Llanover Estates – CS0139 – Former petrol station, Llanover [Llanover Estates] • Llanover Estates – CS0140 - Land of Rhyd-y-Meirch [Llanover Estates] • MHA – CS0215 – Land at Llanellen [MHA] • MHA – CS0214 – Land at Churchfields, Devauden [MHA]

Page 1530	• MHA – CS0101 – Land at Parklands, Llandogo [MHA] • BB3 Ltd – CS0232 – Land west of Red Llandes, Shirenewton, CS0016 – Land East of Little Mill, CS0278 – Land west of Raglan, CS0168 – Land adj Merlin Close, Rogiet, CS0229 – Land opposite Chepstow Garden Centre [BB3 Ltd] • Leathdunn Ltd – CS0036 – West of B4293, Devauden [Leathdunn Ltd] • Taylor Wimpey – CS0078 – Land adj Croft Y Bwla [Taylor Wimpey] • CS0232 – Land west of Red Llandes, Shirenewton, CS0016 – Land East of Little Mill, CS0278 – Land west of Raglan, CS0168 – Land adj Merlin Close, Rogiet, CS0229 – Land opposite Chepstow Garden Centre. [Private Individual] • Manor Farm Partnership - CS0232 – Land west of Red Llandes, Shirenewton, CS0016 – Land East of Little Mill, CS0278 – Land west of Raglan, CS0168 – Land adj Merlin Close, Rogiet, CS0229 – Land opposite Chepstow Garden Centre. [Manor Farm Partnership] • Johnsey Estates Ltd – CS0113 – CS0113 – Castle Oaks (Site D) [Johnsey Estates Ltd] • Johnsey Estates Ltd – CS0282 – NW Burrium Gate [Johnsey Estates Ltd] • Vistry Group – CS0277 – Drewen Farm [Vistry Group] • Marston's Plc – CS0077 – Piercefield Public House, St Arvans [Marston's Plc] • Taylor Wimpey PLC – CS0253 - Ifton Manor (Site A) [Taylor Wimpey] • Private Individual - CS0232 – Land west of Red Llandes, Shirenewton, CS0016 – Land East of Little Mill, CS0278 – Land west of Raglan, CS0168 – Land adj Merlin Close, Rogiet, CS0229 – Land opposite Chepstow Garden Centre. [Private Individual] • Edenstone – CS0205 - Land at Usk Road, Raglan [Edenstone] • Private Individual – CS0027 & CS0028 Llanellen Court Farm [Private Individual] • Private Individual - CS0232 – Land west of Red Llandes, Shirenewton, CS0016 – Land East of Little Mill, CS0278 – Land west of Raglan, CS0168 – Land adj Merlin Close, Rogiet, CS0229 – Land opposite Chepstow Garden Centre. [Private Individual] • Private Individual – CS0151 – Former Troy Rail Yard [Private Individual] • Edenstone – CS0189 – Land at Tudor Road [Edenstone]
LPA Response	Candidate site submissions have been considered as part of the candidate site assessment. Individual site recommendations can be viewed in the Candidate Site Assessment Report.
LPA Recommendation	See the Candidate Site Assessment Report for Candidate Site recommendations.

Question 5 – Do you have any comments on Strategic Policy S3 Sustainable Placemaking & High Quality Design?

37 organisations/private individuals submitted a response to question 5.
There was general support to Strategic Policy S3. Some changes to the existing policy wording were put forward and questions relating to the definition of some of the terms noted within the policy.
Green Infrastructure was referred to in a number of representations, with support for its inclusion but also whether the approach should always be led by Green Infrastructure.

Key Theme	Summary of Points Raised
Support policy	• The Canal & River Trust fully support policy noting it is in line with their own guidance [Canal & River Trust].

	• Support in so far that it aims to ensure development contributes towards creating high quality, attractive and sustainable places that support the well-being of the community [Melin Homes, Monmouthshire Housing Association, Richborough Estates, Llanarth Estates, Tirion Homes, Candleston Homes, Sero Homes, Sero, Private Individuals x 4]. • Support the principle of the policy and recognise the importance of placemaking in good design [Redrow Homes]. • Support policy in principle and consider site promoted could be carried out with full regard to the aspiration of the policy [Grove Farm Estates & Development]. • Support policy, particularly criterion iv) [Cllr Louise Brown]. • Agree high quality design is essential [Tompkins Thomas Planning] • Broadly agree with the wording and thrust of policy, consider site promoted will achieve the aspirations of this policy [Marston's PLC]. • Site promoter prides itself on design excellence and providing high quality homes that would align with this policy [Edenstone].
LPA Response	Support for Strategic Policy S3 is welcomed.
LPA Recommendation	Minor updates have been made to Strategic Policy S3 one relates to update of some wording for consistency in relation to mix of uses, sustainable travel and the other to further emphasise priorities of the Deposit Plan with regard to responding to climate change, however none of the changes are considered to be significant.
Changes suggested to policy wording	• Additional wording should be included to recognise the way in which developments are required to meet this policy will in part depend on the scale of development. Reference to PPW11 noting placemaking should not add additional cost to a development [Home Builders Federation and Barratt & David Wilson Homes]. • Suggest part ii) is amended to 'incorporate a mix of uses where appropriate to minimise the need to travel and provide sustainable transport links to maximise opportunities for active travel and public transport use' [Vistry]. • Refer to criterion ii) noting this should be expanded to acknowledge the role promoting the ability working from home can play in terms of minimising the need to travel [Richborough Estates] • Supporting text should state criterion ii) could be achieved either through bringing forward mixed use developments, or through the appropriate location of new development alongside other existing uses [Richborough Estates]
LPA Response	Comments noted. It is recognised that an appropriate mix of uses would not be applicable to all sites and scenarios.
LPA Recommendation	Minor updates have been made to the wording of Strategic Policy S3. With respect of criterion ii) specifically it is recognised that an appropriate mix of uses would not be applicable to all sites and scenarios and therefore an element of flexibility has been added to account for this. Additional minor updates to wording have been made for consistency in relation to sustainable travel and to further emphasise priorities of the Deposit Plan with regard to responding to climate change, however none of the changes are considered to be significant.
Support prominence given to GI.	• Welcome proposals for placemaking and the prominence given to Green Infrastructure in design considerations [Abergavenny Town Council].
LPA Response	Support noted.
LPA Recommendation	No change required.

Development to be built to net zero carbon	• Disappointed there is no commitment for future development to build to net zero carbon to meet the declared climate crisis objectives [Abergavenny Town Council].
LPA Response	Comment noted. One of the core purposes of the Council is to become a zero-carbon County. Policy NZ1 Monmouthshire Net Zero Carbon Homes has been included within the Deposit Plan to reflect this aspiration. Further detail of how this will be achieved is set out in the detailed policy framework of the Deposit Plan.
LPA Recommendation	Additional wording has been added to S3 to emphasise the need to respond to climate change.
Question whether approach to design should be led by GI	• Question whether the approach to design should always be led by Green Infrastructure, good design responds to all aspects of the context, opportunities and needs of the site [Abergavenny & District Civic Society and Abergavenny Transition Town]. • Note S3 is supplemented by S17 relating to GI, suggest a further strategic policy is equally needed covering the built environment and heritage [Abergavenny & District Civic Society].
LPA Response	Comments noted, policy S3 allows for flexibility, while a GI-led approach will be appropriate for most sites and proposals it is recognised in certain contexts it would not be relevant. With regard to the suggested need for an additional Strategic Policy for the built environment and heritage it is considered criterion iv) along with the detailed supporting policies are sufficient.
LPA Recommendation	No change required.
Terms used	• Refer to terms such as 'high quality', 'high standard' and 'good design' noting these are difficult to pin down legally and precisely when applied to development. Suggest policy should include reference to insist such development should be reviewed and approved by the Design Commission for Wales [Abergavenny Transition Town]
LPA Response	Comments noted. The Design Commission for Wales have been and continue to be involved in helping to shape the Strategic Sites progression. It would not be practical, nor would there be resource available to insist that they review and approve all development in any given area.
LPA Recommendation	No change required.
Impact on viability	• Concern that the driver to design will place overly onerous conditions on planning to the threat of viability. Any additional requirements that might impact further on development costs need to be highlighted at an early stage of the planning process so they can be taken into account in assessing land values and the viability process. Urge caution in respect of being overly prescriptive and ensuring any targets associated with S3 are considered alongside other policy objectives to ensure the plan does not affect deliverability [Redrow Homes].
LPA Response	Comment noted. Strategic S3 provides an overarching framework for sustainable placemaking and high quality design, agree that the deliverability and viability of sites is of importance.
LPA Recommendation	No change required.
Other	• Comment noting new housing developments are being approved with inadequate road systems [Private individual x 1].

	• Questions relating to detailed biodiversity matters that would be dealt with at a planning application stage on a site by site basis [Private individual x 1] • Question relating to whether CADW, National Trust etc are consulted on applications [Private individual x 1]. • Nothing in policy to future design houses to incorporate home working or flexible living arrangements to allow for intergenerational living, 3 or 4 storey dwellings may be appropriate rather than a focus on 2 storey [Private individual x 1]. • Note development of greenfield sites is not sustainable, reference given to the Bayfield site [Private individual x 1]. • Suggestion the policy is a marketing ploy to gain agreement [Private individual x 1]. • Sustainable development cannot acceptably replace mature and biodiverse ecosystems [Private individuals x 2]. • Focus on building houses not actually making areas a nice place to live [Private individual x 1].
LPA Response	Infrastructure requirements are dealt with individually for each of the site allocations and are also included in an Infrastructure Delivery Plan. A specific Strategic Policy in relation to Infrastructure is also included, along with other detailed policies within the framework of the Deposit Plan in relation to sustainable transport. Ecology matters are dealt with both strategically from the outset of determining site allocations and at the site specific planning application stage. This approach ensures any sites included within the plan do not have any major constraints that could prevent development coming forward at a later date. A Housing Mix policy is included in the Deposit RLDP the supporting text of which recognises that homes should be designed so that they are flexible and responsive to the changing needs of the occupants over their lifetime. The Plan recognises that there are limited opportunities within Monmouthshire for brownfield development. The Bayfield site specifically referred to is no longer included as an allocation within the Plan. This strategic policy provides an overarching framework for sustainable placemaking and high quality design and will ensure development proposals reflect this aim. The Deposit RLDP reflects National Guidance set out in PPW ensuring that development does not cause any significant loss of habitats and populations of species and must provide a net benefit for biodiversity and improved ecosystem resilience. The aim of this strategic policy is to ensure new development incorporates the principles of sustainable placemaking and good design which will in turn deliver a wide range of social, economic, environmental and health and well-being benefits for local communities and the County as a whole.
LPA Recommendation	No change required.

Question 6 – Do you have any comments on Strategic Policy S4 Climate Change?

61 organisations or members of the public submitted a response to question 6.
The overarching principles of the policy were generally well received, although the need for further guidance on the definition of net zero ready and the need to factor in

viability were highlighted. There were also concerns that the Preferred Strategy and its allocations are contrary to the principles of climate change.

Key Theme	Summary of Points Raised
Welcome Climate Change aims	• Welcome the PS's focus on active travel, sustainable transport, and the Plan's commitment to net zero carbon developments. [Chepstow Town Council, NRW, Tompkins Thomas Planning] • Welcome the promotion of water efficiency measures and minimising the impact on water resources and quality. [Dwr Cymru] • Welcome policy aims but they should be applied to new allocations on a site-by-site basis and with regard to viability. [Melin Homes, MHA, Hallam Land Management, Llanarth Estates, Edenstone Group, Marston's Plc, Edenstone, Tirion Homes, Candleston Homes, Sero Homes, Sero, Edenstone, Private Individuals x 2] • Welcome policy but reference to public transport via electric buses and protection of GI and open space should be added. [Cllr Louise Brown]
LPA Response	Support welcomed. Detailed viability assessments that take account of the Council's climate change aspirations have been undertaken on the proposed site allocations. The policy refers to maximising opportunities for public transport use and ensuring the provision of electric vehicle charger infrastructure. Strategic Policy S9 – Sustainable Transport also covers the promotion of all forms of sustainable transport methods. Criterion viii) of S4 sets out strategic requirements for the inclusion of green infrastructure.
LPA Recommendation	No significant changes required to the overarching policy principles; however, minor wording changes have been made.
Definition/viability	• Further guidance required on the definition of net zero developments and how they will be measured. [B&DW, Vistry, Bellway Homes] • Further guidance regarding the targets and measures is required to fully assess the viability impacts, allowing sites to be considered on a site-by-site basis. [Edenstone Homes, Redrow Homes, Grove Farm Estates & Developments, Redrow Homes, Richborough Estates, Barwood Development Securities Ltd, Edenstone, Private Individuals x 2,] • Concerned whether the policy requirement is supported by the relevant evidence base and appropriate viability assumptions to ensure it is justified and meets the test of soundness. [Taylor Wimpey]
LPA Response	Policy NZ1 – Monmouthshire Net Zero Carbon Homes of the Deposit RLDP and the associated evidence base set out the details of the Council's net zero requirements and how it will be measured. Detailed viability assessments that take account of the Council's climate change aspirations have been undertaken on the proposed site allocations.
LPA Recommendation	Refer to Policy NZ1 – Monmouthshire Net Zero Carbon Homes for further details.
Further details/evidence needed	• More rigorous policy on the energy efficiency of buildings and construction required. [Abergavenny & District Society, Private Individuals x 4] • Little reference to building design or recommendations for low energy solutions to facilitate the reduction in emissions for residential developments. [Abergavenny Town Council] • New development can only play a part in not adding to the causes of climate change. [HBF, B&DW] • Should include policies elsewhere aimed at reducing car use and commuting. [Private Individual] • Undertake further work on the contribution renewable energy can make to assist with climate change and decarbonisation. [WG] • Policy could go further and seek to improve, where possible, flood risk to existing communities. The SFCA could consider opportunities for these to be assessed at a local/site level. [NRW]

LPA Response	The Deposit Plan introduces a policy NZ1 – Monmouthshire Net Zero Carbon Homes, which sets out details of the energy efficiency requirements of new homes. In addition, there are multiple policies seeking to reduce car usage including Policies HA1 – HA18 site allocation policies setting out site specific active travel requirements, Strategic Policy S3 Sustainable Placemaking & High Quality Deign, Strategic Policy S13 – Sustainable Transport and ST1 – Sustainable Transport Proposals. Section 10 of the Deposit Plan sets out details of the contribution Monmouthshire can make to assist with climate change and decarbonisation including established renewable energy generation targets. This has been informed by the background evidence undertaken by the Carbon Trust on the Monmouthshire Renewable Energy and Low Carbon Assessment (October 2020) and Stakeholder Interviews and Workshops undertaken in 2024. The findings of this are set out in the Renewable Energy Background Paper and have been used to inform the policy approach taken in the Deposit Plan. Flood risk considerations are considered to be adequately covered by S4 and national policy.
LPA Recommendation	No significant changes required to the overarching policy principles, however, minor wording changes have been made.
Site Specific	• Ensure all development is compliant with TAN15. [WG] • To achieve climate change requires sustainable communities that do not require residents to have to travel excessively to access facilities. [Llangybi Fawr Community Council] • County Farms to the south of the County should be considered for solar farms. [SOUL] • Sifting out of candidate sites based on TAN 15 must be less didactical and more flexible. [F1 Real Estate Management Ltd] • Given the worsening climate emergency, associated investigations and appropriate flood risk management proposals need to be agreed before any allocations are made. [Private Individuals x 2] • SABs and SUDs need to be considered. [Private Individual] • Development in the south must take account of flood risk and the environmental impact of traffic. [Private Individual] • Increased traffic particularly the Hardwick Hill will affect health and the climate. [Private Individuals x 2] • Candidate sites need to be tested against policy principles. [Private Individual]
LPA Response	The site selection process has had full regard to the current TAN15 and flood management. All allocations will be required to approved by the SuDs Approving Body. Traffic levels and active travel links have been considered in relation to the site allocations and within the Strategic Transport Assessment. The County's potential solar resource has been considered as part of the Renewable and Low Carbon Energy Assessment. This concludes that while the County has a significant potential solar resource, this is dispersed throughout the County in small parcels of land. Therefore, a criteria-based policy has been included in the Deposit Plan to allow the consideration of solar farm applications on a site-by-site basis. A solar allocation has, however, been made in Raglan at Raglan Enterprise Park (Policy CC2 – Renewable Energy Allocation).
LPA Recommendation	No significant changes required to the overarching policy principles; however, minor wording changes have been made.
RLDP contrary to policy	• Cumulative impact and failure to protect GI on the levels is inconsistent with the principles of nature conservation and declaration of climate and nature emergency. [Cllr Frances Taylor, Private Individuals x 3] • Building on greenfield sites goes against the policy to limit climate change and will increase the carbon footprint. [Private Individuals x 3] • Recent planning permissions, (e.g., Mabey Bridge) make no sense environmentally. [Private Individual]

LPA Response	Brownfield opportunities have been considered through the site selection and candidate site process however, given the limited brownfield opportunities in a Monmouthshire context, greenfield opportunities have had to be considered to meet the housing and employment requirements. Cumulative impact of development throughout the County, including the Gwent Levels is considered as part of the Integrated Sustainability Assessment. In addition, there is a suite of policies in the Deposit Plan seeking to protect international designations in the County such as the Gwent Levels SSSI. The Mabey Bridge planning permission made use of a brownfield site in close proximity to Chepstow town centre and good public transport links via the train station.
LPA Recommendation	No change required.
General	• Include reference to Objective 5 – Minerals and Waste in relation to Policy S4 Climate Change. [MPA] • Climate Change policy should be upfront. [Abergavenny Transition Town]
LPA Response	In the interest of brevity, the RLDP objectives listed in the Links to Wider Framework box are those that are considered to be most pertinent to the policy in question, however, most RLDP objectives are linked to every policy some way. It is not considered necessary to list all objectives in relation to each policy. Similarly, the Plan should be read as a whole with policies being applied as necessary and not ordered in terms of priority.
LPA Recommendation	No change required.

Question 7 – Do you have any comments on Strategic Policy S5 Infrastructure Provision?

56 organisations/private individuals submitted a response to question 7.
There was some support for the policy. A number of wording changes were suggested, some suggesting the need to be dependent on viability, others wanted more assurance the policy requirements would be met.
The need for an infrastructure plan was noted in time for the Deposit Plan.
Concern was also raised by some in relation to the need for additional infrastructure in relation to proposed strategic sites.

Key Theme	Summary of Points Raised
Support policy	• Applaud provisions of policy – particularly the inclusion of 'strategic utilities including; water and sewerage infrastructure' [Dwr Cymru/Welsh Water]. • Fully supportive of policy [The Canal & River Trust (Gandwr Cymru)]. Suggest policy may be improved if there was a requirement to carry out an audit on the existing situation to better inform discussions on what impact there may be and whether remediation is necessary. • Support in principle, suggest it would be useful to explain the justification text in relation to sewage infrastructure in that new development should not result in exceedances in the consented discharge of a WwTW. Also note infrastructure includes all the pipework along the public sewer network [Natural Resources Wales].
LPA Response	Support for S5 welcomed.

LPA Recommendation	With regard to comments relating to wastewater treatment works, an additional section has been included in the Key Issues, Challenges and Opportunities section in relation to water quality in Riverine Special Areas of Conservation. It is also recognised and noted in the Infrastructure Delivery Plan in relation to specific sites.
Suggested changes to wording	• Suggest changing wording to 'remedy any proven future deficiencies'. Also suggest adding in after 'prior to occupation' the following 'or in an agreed phased approach'. Suggest adding in 'Planning conditions or' before 'Planning Obligations'. After 'acceptable in planning terms' suggest the following is added 'and other policy requirements' [Home Builders Federation]. • Final wording should ensure that requirements are both necessary and viable in accordance with the Development Plans Manual (edition 3) [Monmouthshire Housing Association, Private individual x 1]. • Concern the wording of the policy implies that proposed development will be required to remedy existing deficiencies, which are not directly related to the development or fairly or reasonably related in scale and kind to the development, contrary to Regulation 122 of the CIL regulations. Suggest addition of a number of amendments to the first paragraph [Vistry]. • Suggest a change to wording in paragraph 5.21 replacing 'should' with 'must', noting this surely should be an obligation [Private individual x 1].
LPA Response	Minor updates have been made to the wording in response to the comments made. These include the deletion of 'to remedy deficiencies' and addition of 'to mitigate any likely adverse impacts' to the first sentence. Additional wording has been added to the third para to note this refers to planning 'agreements and' obligations. After it is acceptable in planning terms 'Such obligations may include' has been replaced with 'The requirements for such agreements/obligations will include consideration and appropriate provision of:'.
LPA Recommendation	No significant changes are required to the overarching policy principles, however, minor wording changes have been made as a result of comments submitted.
Broadband and strategic utilities	• Provision of broadband connections and utilities is a matter for the developer to deal with on a site-by-site basis and it is not considered appropriate or necessary to provide a financial contribution to facilitate this provision [Monmouthshire Housing Association].
LPA Response	Comment noted, there is no reference to broadband connections within the strategic policy. Detailed policy considerations for telecommunications, broadband and other digital infrastructure are set out in Policy IN1. Reference in the supporting text is made to Future Wales which notes new developments should include the provision of high-speed broadband infrastructure from the outset.
LPA Recommendation	No change required.
Cultural facilities and strategic utilities	• Do not consider the likes of some cultural facilities and strategic utilities are necessary to ensure a development is acceptable in planning terms [Monmouthshire Housing Association, Private individuals x 2].
LPA Response	Comments noted. The infrastructure requirements of sites will be determined on a case-by-case basis. The strategic policy provides an overview of the types of infrastructure, facilities, services and related works that are necessary to make development acceptable.
LPA Recommendation	No change required.
Road infrastructure	• State there is no mention of road infrastructure in policy [Cllr Louise Brown].

	• Suggest the section is low on actual specific interventions. Note the need to improve public transport is very important but requires significant investment given the rural nature of Monmouthshire. States investment in roads is key, refers to buses struggling to get in and around Chepstow as an example [Private individual x 1].
LPA Response	Comments noted. Transport infrastructure is included within the strategic policy. There are also other detailed policies within the Deposit Plan relating to sustainable transport and transport schemes. Policy ST5 identifies numerous transport schemes identified in the Local Transport Strategy the will be supported, including active travel, public transport improvements and road schemes.
LPA Recommendation	No change required.
Health infrastructure	• Note this is at the bottom of the list, suggest it can take weeks to get a routine appointment in Caldicot and Chepstow and difficult to get a dentist appointment. Health centres need to be included in strategic sites [Cllr Louise Brown].
LPA Response	Comment noted. The list of requirements is not ranked in any way.
LPA Recommendation	No change required.
Education	• Additional capacity in schools must be confidently delivered before or with any major new developments [Private individual x 1].
LPA Response	Comment noted. The use of trigger points for education contributions within S106 agreements will be considered with colleagues in the MCC Education Department.
LPA Recommendation	No change required.
Infrastructure Plan	• Support policy aspirations but needs to be established as part of any allocation. Note no infrastructure plan in place, refer to Development Plans Manual which indicates this is an essential piece of evidence, particularly in Monmouthshire given significant constraints in existing main settlements and lack of provision in smaller villages [Melin Homes, Llanarth Estates, Tirion Homes, Candleston Homes, Sero Homes, Sero & Private individuals x 2]. • An infrastructure plan should be prepared to demonstrate how relevant infrastructure to support development will come forward (Development Plans Manual, paragraphs 5.125 -5.128) [Welsh Government].
LPA Response	Comment noted. An Infrastructure Delivery Plan has been produced and is included as an appendix to the Deposit Plan.
LPA Recommendation	No change required.
Management companies	• Suggest greater flexibility should be allowed in the policy wording as it advances to Deposit stage. Current wording of S5 does not make provision for sites managed via a private management company which is often the preference for both the local authority and applicant [Monmouthshire Housing Association, Edenstone and Private individuals x 2].
LPA Response	Comment noted, it is considered that in some circumstances the use of management companies may be appropriate and therefore additional wording should be included. It should however be noted that it is the Councils preference for GI and open space to be adopted by MCC.

LPA Recommendation	Additional wording added to strategic policy to note this includes the use of management companies where appropriate.
Adoption of infrastructure	• Question whether wording in policy means that in no circumstance will the Council adopt any new infrastructure [Home Builders Federation].
LPA Response	Comment noted. This doesn't appear to be evident in the wording of the strategic policy. Council departments will liaise with site promoters at the relevant time in relation to adopting any new infrastructure.
LPA Recommendation	No change required.
Affordable Housing	• Concern over the final paragraph relating to affordable housing noting occupiers are often more reliant on the need for local facilities and infrastructure often required to be delivered by new housing development. Question whether such a development would be compliant with other policies in the plan relating to sustainability and placemaking [Home Builders Federation].
LPA Response	Comment noted. The delivery of affordable housing is a core priority of the Council and the RLDP, as such it is pertinent to ensure that affordable housing is brought forward at the appropriate percentage set out Strategic Policy S7. This should not be as a compromise to the overall site, other policies set out within the Plan and placemaking principles will still apply.
LPA Recommendation	No change required.
Viability	• Welcomes the commitment that due regard will be given to overall development viability and clarification that priority will be given to affordable housing [Vistry]. • Obligations associated with development are essential to ensure social infrastructure is in place to accommodate new residents, however overly rigid policies can fail to allow for the specifics of a site and its particular viability. Policy associated with S5 should be clear and easy to interpret but also have inherent flexibility to accept and allow for site-by-site viability [Redrow Homes]. • Suggest if developers make so much money they can contribute more to the necessary infrastructure [Private individual x 1]. • State no means by which to test proposed infrastructure requirements against the viability of potential candidate sites at this stage and as such the policy will require further refinement [Edenstone].
LPA Response	Comments noted. Viability testing has been undertaken on all of the proposed site allocations in the Deposit RLDP. Viability appraisals may also be requested for other proposals, detail is set out in the supporting text of the strategic policy.
LPA Recommendation	No change required.
Infrastructure should come first	• Infrastructure should always come first, suggest without it settlements will fail to thrive or fail completely [Llangybi Fawr Community Council]. • Suggests policy creates opportunity for developers to avoid paying required infrastructure contributions if viability assessment demonstrates they can't afford them. To avoid creating further infrastructure stress states the Council must commit to finding those required contributions from other sources before approving development that would create a detriment to infrastructure. Uses Chepstow as an example in relation to WelTAG study that further development would increase levels of traffic and pollution in the AQMA [Cllr Christopher Edwards and Private individual x 1].

	• Policy fails to mention the need to prevent any further development without the road and public transport infrastructure being in place [Cllr Louise Brown]. • No infrastructure in place currently/infrastructure is inadequate, additional housing will exacerbate these issues[Private individuals x 3].
LPA Response	Comments noted. An Infrastructure Delivery Plan has been prepared which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of the allocated sites. Site specific considerations are included as an appendix to the Deposit Plan.
LPA Recommendation	No change required.
Area specific	• Refer to High Beech roundabout noting development should go hand in hand with measures to address these severe traffic problems. Also note childcare provision, school places and health services must be included in the plan [Chepstow Town Council]. • Refer to an additional junction on the M48 at Caldicot, suggest this would go some way towards relieving some of the pressure on the local road system [Chepstow Town Council]. • For some strategic development sites there is potential for cumulative trunk road capacity impacts, especially at Abergavenny, Caldicot and Chepstow. All strategic sites should be supported by Transport Assessments that are underpinned by the Welsh Transport Strategy and have regard to Active Travel and air quality [Welsh Government]. • Suggestion Severnside is poorly provided with infrastructure, promised in the LDP and not delivered. Services have not grown exponentially with development [Private individuals x 14]. • Reference to supporting text in paragraph 5.20 noting the statement relating to appropriate infrastructure will be scrupulously observed when reviewing suitable rural settlement candidate sites. Reference is made to existing community groups and facilities noting active community collaboration and enterprise play a part in ensuring rural settlements are resilient and sustainable [Private individual x 1]. • Suggestion infrastructure is inadequate in Chepstow, primarily a transport issue as the town is gridlocked most days. State Welsh Government do not currently support a Chepstow bypass. A concrete solution is needed before new houses can be built [Private individuals x 5]. • State Chepstow cannot cope with traffic created by new development in the wider region, traffic from outlying areas all comes through the 'Chepstow bottleneck' often exacerbated by bridge closures due to bad weather. A regional policy approach to traffic through Chepstow is needed [Private individual x 1]. • Note 3 preferred strategic sites have been well assessed against criteria, the smaller candidate sites need to be similarly assessed so as not to over burden existing communities and infrastructure or generate more journeys when the car is the only option [Private individual x 1]. • Refer to Usk noting there is insufficient infrastructure, suggest improvements need to be made to the town before housing [Private individual x 1]. • State the traffic is a problem and increasingly so, state there is no support/contingency of relief roads or affordable public transport. Suggest the walk between Undy and Rogiet is treacherous [Private individual x 1]. • Representor states they have grave concerns given that the current infrastructure cannot cope with the number of citizens in Caldicot at present [Private individual x 1].
LPA Response	An Infrastructure Delivery Plan has been prepared which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of the allocated sites. Site specific considerations are included as an appendix to the Deposit Plan.
LPA Recommendation	No change required.

Other	• Query why no reference to minerals and waste in S5, note infrastructure provision is reliant on the supply of aggregates and mineral products [Mineral Products Association] • Note developers may be required to fund improvements to water and sewerage infrastructure should they wish to bring forward a development site in advance of regulatory investment. Where insufficient capacity is available and no reinforcement works are programmed within the respective Capital Investment Programme, the requisition provisions (of the Water Industry Act 1991) can be entered into for water and sewerage infrastructure, these requisitions do not apply in the instance of WwTW and as such planning obligations may be necessary [Dwr Cymru/Welsh Water]. • The Library Authority part of Gloucestershire County Council suggest new housing developments will place additional pressure on these services, this in turn could require mitigation proportionate to the scale of growth proposed. They request the impact of new housing development on existing community infrastructure outside of the MCC administrative area, including libraries, is addressed in the RLDP [Gloucestershire County Council]. • Note where development may affect the operational railway developers should consider the impact on railway infrastructure such as need for better/increased parking at stations or improvements to rail services. It is appropriate to require developer contributions to fund improvements as Network Rail is a publicly funded organisation with a regulated remit [Network Rail]. • Refer to level crossings and safety measures. Note a full transport assessment should be submitted alongside proposed development in close proximity to a level crossing [Network Rail]. • Policy should make it clear that the cost of providing required infrastructure should not be at the expense of satisfying S3, S4 and relevant development management policies [Abergavenny & District Civic Society]. • Priorities such as Magor Station and improvements to Caldicot stations and Chepstow train station should be fully investigated and supported in respect of addressing climate change and supporting modal shift. Should be no development without limiting the reliance on road infrastructure and car ownership [Cllr Frances Taylor]. • Questions what is the provision/expectation for the developer to provide or support the cost of new infrastructure [Private individual x 1]. • Note there are terrible links to Bristol via rail and bus with infrequent services [Private individual x 1] • Suggest there is no evidence or planning for the obligations listed under the policy [Private individual x 1]. • State Infrastructure is at breaking point, suggest the Council should concentrate on building up commerce in the town centre benefitting those who already live in the County [Private individual x 1]. • Note while the policy appears to serve the needs of the local community, state they have little confidence the policy will be upheld [Private individual x 1].
LPA Response	Planning agreements and obligations are not usually needed specifically to contribute to the supply of aggregates and minerals. Detailed policy considerations in relation to aggregates and minerals are considered elsewhere in the Deposit Plan in S16 along with supporting Development Management policies. Reference is given within the strategic policy to strategic utilities including water and sewerage infrastructure. Reference is given to community and cultural facilities within the strategic policy and will be considered on a site-by-site basis. Reference is given to sustainable transport measures in Strategic Policy S6 – Infrastructure which would include contributions to public transport as necessary. Proximity to level crossings and safety measures is of importance and will be assessed on a site-by-site basis. The provision of infrastructure should not be as a compromise to the overall site, other policies set out within the plan and placemaking principles will still apply.

	An Infrastructure Delivery Plan has been prepared which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of the allocated sites. Site specific considerations are included as an appendix to the Deposit Plan. The list of infrastructure requirements is not exhaustive nor ranked in any way.
LPA Recommendation	No change required.

Question 8 – Do you have any comments on Strategic Policy S6 Affordable Homes?

56 organisations or members of the public submitted a response to question 8.
A number of representors responded positively to the provision of 50% affordable homes, however concern was raised by others on the viability and deliverability of such a high proportion noting the overall viability of this approach does not appear to have been tested at this stage. The resultant impact of sites with 50% affordable homes on the delivery of sustainable places was questioned.
It was suggested the housing requirement should be higher than currently planned in the Preferred Strategy, suggest this in turn will result in an increase in the affordable housing target.
The definition of affordable housing was questioned.

Key Theme	Summary of Points Raised
Support policy	• Welcome commitment to provide up to 1850 affordable homes by 2033 [Abergavenny Town Council]. • Support innovative means of providing affordable homes, state due to the current adverse economic situation the starting point should be 50% of new homes. Note there are opportunities for both public and private sectors to commit to providing low cost homes for all age groups in a number of distinctly different ways. Refer to proven track record in partnering with developers to deliver such housing with examples given. [Melin Homes, Llanarth Estates, Tirion Homes, Candleston Homes, Sero Homes, Sero & Private individuals x 2]. • Strongly supports affordable housing-led sites [Welsh Government]. • Welcome the target and the commitment, await further details [Abergavenny & District Civic Society]. • Note the commitment to provide 50% affordable housing is ambitious but welcome the commitment to work with the Welsh Government, Registered Social Landlords and house developers to ensure that thresholds for affordable housing are achieved. Note while there is some ambiguity on the mechanisms of how this will be achieved it is positive the revised PS provides further detail [Leathdunn Ltd, Johnsey Estates UK, Vistry Group & Private Individual x 1]. • While support the Council's ambition to deliver affordable housing encourage the Council to ensure the policy isn't overly prescriptive to still allow viable and deliverable schemes to come forward [Redrow Homes Limited]. • Aspiration is supported in principle subject to the ongoing viability process [Richborough Estates]. • Pleased that the latest RLDP Preferred Strategy intends to allow for up to 1,100 affordable homes, recognising there can never be enough affordable homes [Private individual x 1]. • Completely agree with the Council's affordable housing targets, state it is imperative that site allocations demonstrate this can be achieved to avoid reduced delivery rates [Tompkins Thomas Planning]. • Support aspiration of the emerging Strategic Policy, comment that candidate sites that have demonstrated accordance with the requirements of the policy should be acknowledged sufficiently positively in the consideration process for the Deposit Plan [Marston's PLC].

	• Agree that affordable homes are necessary, suggest the Council undertakes work to help residents understand what this means in a proactive way to reduce stigma [Private individual x 1]. • Support policy as makes sense given the significant increase in local house prices recently [Private individual x 1]. • Support policy noting if homes are to be built they should be affordable [Private individual x 1].
LPA Response	Support for the Strategic Policy S6 (now S7) is welcomed. Delivery of affordable housing continues to be a core priority of the RLDP. Additional detail has been added to the policy setting out how affordable housing will be delivered including the appropriate thresholds to account for different scales of development.
LPA Recommendation	Additional detail has been added to Strategic Policy S7 (formally S6) to provide clarity on the Councils approach to the delivery of affordable housing.
Provision of 50% Affordable Homes	• Raise concerns over the requirement of 50% affordable homes on all allocated sites. Question whether sites of 50% affordable housing will truly deliver sustainable places through design, layout and mix of uses that enhance the character and identity of Monmouthshire's settlements [Home Builders Federation]. • Concern over 50% delivery of affordable housing as will likely result in complex partnerships between private developers and registered social landlords and a likely need for grant funding to allow for their delivery [Barratt & David Wilson Homes and Barratt and David Wilson Homes South Wales]. • Monmouthshire Housing Association promoted the sites previously as 50/50 so position has not altered [Monmouthshire Housing Association]. • Suggest 50% affordable housing risks creating social ghettoes and considers this to be social engineering. States should let people choose where they want to live and who they want as neighbours [Private individual x 2]. • Suggest there should be over-provision of affordable housing to account for historic under-provision [Disability Advice Project]. • Delivery of 50% will need to be evidenced by testing in the Council's viability appraisals at Deposit stage with effective control over land being a main consideration. Evidence should include resolution to use public land for this purpose and binding legal agreements where the land is in private ownership or resolution by Council for Compulsory Purchase powers [Welsh Government]. • Do not support a 50% housing target on all new site allocations as consider this could cause a number of viability issues for developers. Suggest a lower target of 35% for all allocated sites and note the 50% figure should be reassessed [Hallam Land Management, Taylor Wimpey & Bellway Homes] • Suggestion that increasing the housing requirement of both market and affordable housing would signify a better method of increasing affordable provision within the County. The 50% target would cause a number of viability issues for developers, which in turn would restrict sites coming forward. Happy to work with the Council to find a mutually beneficial solution to affordability issues [Edenstone Homes and Edenstone]. • Concern over 50% provision on all new allocated sites. Suggest a lack of evidence and analysis to demonstrate 50% affordable housing can be delivered [Persimmon Homes East Wales]. • Acknowledge the affordability issues that face the County and understand the rationale behind seeking a higher level of affordable homes, state must be flexibility on a site-by-site basis, especially in considering site specific constraints [Private individuals x 2]. • Need for flexibility in considering brownfield sites which typically have higher cost associated with demolition and site clearance [Private individual x 1]. • State no evidence to suggest the plan will deliver 50% on all new sites, note will not meet the test of soundness. Concern over viability and deliverability, suggest a sounder strategy would be to increase the overall housing requirement so the affordable housing requirement accounts for a lower proportion of housing to be delivered from allocated sites [Vistry].

	• Questions how the Council will deliver, measure and guarantee the number of affordable homes [Private individual x 1]. • Suggest 50% will not be achieved as the affordable homes targets have not been met at any of the other developments in recent years [Private individual x 1].
LPA Response	Comments noted. The delivery of affordable housing continues to be a core priority of the RLDP and furthermore is a corporate priority. Viability testing has been undertaken on all of the proposed site allocations in the Deposit RLDP. This assessment has been undertaken independently by a viability consultant on behalf of Monmouthshire County Council, viability assessments have demonstrated that the proposed site allocations are viable based on the provision of 50% affordable housing. Different affordable housing thresholds are provided for other types of development and are set out in Strategic Policy S7.
LPA Recommendation	Additional detail has been added to Strategic Policy S7 (formally S6) to provide clarity on the Council's approach to the delivery of affordable housing.
Housing requirement	• Refer to comments in connection to Strategic Policy S1 suggesting the housing requirement should be higher than currently planned in the Preferred Strategy, suggest this in turn will result in an increase in the affordable housing target [Candleston Homes and Taylor Wimpey PLC].
LPA Response	Comment noted, the housing requirement is considered in relation to Policy S1 in the Initial Report of Consultation.
LPA Recommendation	No change required.
Local Housing Market Assessment (LHMA)	• Refer to the LHMA for 2020 – 2025, note it is of significant concern that the Council have not yet revised the LHMA using the new approved methodology but must do so by the time the RLDP is placed on Deposit [Welsh Government].
LPA Response	The LHMA Refresh 2022 – 2037 has been undertaken by officers in the Housing team using the approved methodology and included a number of informal meetings with officers in the Welsh Government Housing team to ensure the correct approach was being undertaken over the last few years. Monmouthshire County Council's Cabinet approved the LHMA Refresh 2022 – 2037 prior to submission to Welsh Government in May 2024. A response was received from Welsh Government in August 2024 noting some additional actions needed to be undertaken to the LHMA before it can be signed off by Welsh Government. This work is on-going.
LPA Recommendation	No change required.
Land values and viability	• Note the relatively high land values in Monmouthshire will assist in supporting the 50% affordable housing target and ambition of exemplar zero carbon quality development. Wish to continue to work with Monmouthshire to understand details of the viability work that supports these ambitions [Torfaen County Borough Council]. • Raise concerns over 50% provision as the viability of this approach does not appear to have been tested, no certainty this can be delivered [Home Builders Federation]. • State this is an ambitious approach may require Welsh Government policy position changes on use of Social Housing Grant or other public sector funding which is very uncertain at this stage. Suggest this should be planned for through the incorporation of an increased flexibility allowance [Barratt & David Wilson Homes].

	• Viability in delivering the policy aspiration is key, 50% is an ambitious target and it may be that grant funding is needed to achieve it, final policy wording should allow flexibility to take account of site-specific conditions [Monmouthshire Housing Association]. • Note no viability evidence to accompany the revised plan at either a high level or site specific viability appraisals. This needs to be rectified by Deposit [Welsh Government]. • Acknowledge the affordable housing requirement and are more than willing to work collaboratively with the Council to meet this need but suggest the quantum of affordable housing for each site should be determined by the outcome of the accompanying viability assessments [Hallam Land Management, Taylor Wimpey, Edenstone Homes and Edenstone]. • Suggest the impact on acceptable land value has not been considered, noting there will be an inevitable reduction to land values with knock on implications on viability of sites and achieving landowner expectations. Note further viability work is imperative with the adoption of a statement of common ground to ensure all sites are being assessed with a fair and equal grounding [Persimmon Homes East Wales]. • Note as it stands the 50% target on all site allocations is untested in respect of its viability. State the next stage of Plan making must evidence this target as being reasonable and deliverable – without such evidence state the Plan will be unsound. Concern that it will not be possible to reasonably demonstrate that all allocations can deliver 50% affordable housing and suggest there is a very real risk of under delivery due to viability [Redrow Homes]. • Note affordable housing targets for open market schemes should not render those sites unviable, should be more flexibility in the final policy wording [Edenstone].
LPA Response	Comments noted, delivery of affordable housing continues to be a core priority of the RLDP and furthermore is a corporate priority. Viability testing has been undertaken on all of the site allocations in the Deposit RLDP. This assessment has been undertaken independently by a viability consultant on behalf of Monmouthshire County Council, viability assessments have demonstrated that the proposed site allocations are viable based on the provision of 50% affordable housing. Different affordable housing thresholds are provided for other types of development and are set out in Strategic Policy S7.
LPA Recommendation	Additional detail has been added to Strategic Policy S7 (formally S6) to provide clarity on the Councils approach to the delivery of affordable housing.
Tenure neutral approach	• The Council need to recognise the different impacts varying forms of affordable housing can have on site viability and move away from requiring tenure neutral affordable housing and ensuring that a proportion of affordable units are delivered as Low Cost Home Ownership homes to enhance the retention of younger working people within the LPA [Redrow Homes].
LPA Response	Comment noted. It is recognised that homes for Social Rent and Low Cost Home Ownership provide for differing needs. The delivery option preferred by Monmouthshire County Council is not determined in the RLDP and will instead be set out in the Affordable Housing SPG.
LPA Recommendation	No change required.
Lack of site in Monmouth/north of the County	• Significant concern is raised on a moratorium of any new affordable housing provision in the northern settlements of Monmouthshire - Monmouth in particular. Suggest this is unsound against Tests 2 & 3 and creates significant concern for affordability in the future [Hallam Land Management & Taylor Wimpey]. • Note affordable homes are needed but are not spatially distributed throughout the County, not meeting the affordable housing needs in the north of the County [Cllr Louise Brown].

LPA Response	Comments noted. The spatial constraint in the Monmouth area relating to phosphates has been removed since consultation on the Preferred Strategy and as a consequence there are now proposed site allocations in Monmouth which will provide affordable homes in the town.
LPA Recommendation	No change required.
Site specific	• Note sites being promoted CS0114 & CS0115 can make an appropriate contribution to the affordable housing need [Johnsey Estates 2020 Ltd]. • Suggest Developer profit is the only way to bring forward affordable houses in Severnside, suggest development on this scale will impact on existing residents and the area in general [Private individual x 1].
LPA Response	Candidate site submissions have been considered as part of the candidate site assessment. Individual site recommendations can be viewed in the Candidate Site Assessment Report.
LPA Recommendation	No change required.
Bungalows	• Notes in view of the demographics of Monmouthshire it would be beneficial to have sites that include 1 – 3 bedroom bungalows to allow the older population to downsize in the local area to free up larger properties for younger families. Will also allow larger properties to be converted to 1/2 bedroom accommodation for those in need of affordable housing [Cllr Louise Brown] • Questions where the affordable bungalows for the elderly and affordable warden aided bungalows are proposed. Suggests getting elderly out of their family homes and into more suitable accommodation to free up larger family homes for families [Private individual x 1].
LPA Response	Comments noted. The mix and tenure of affordable homes will be agreed with the Council's Housing team at the planning application stage, this will include bungalows where there is an evidenced need.
LPA Recommendation	No change required, the supporting text sets out information in relation to mix and tenure of affordable homes.
Definition of affordable housing	• No definition is provided on what an affordable home is [Private individuals x 2]. • Question what affordable housing is noting what is affordable to one, won't be for another [Private individual x 1].
LPA Response	Definitions of affordable housing are provided in the supporting text to Strategic Policy S7 (formally S6).
LPA Recommendation	No change required, the supporting text provides detail on definitions of affordable housing.
Other	• Note housing delivery is reliant on the supply of aggregates and mineral products. State it is imperative that new sites do not impact upon Minerals Safeguarding Areas [Mineral Products Association]. • State references to net zero ready housing need to be included in this policy with a clear definition of the meaning of this commitment [Abergavenny & District Civic Society]. • Refer to need for homes for the County's increasingly elderly population, especially affordable homes and the increasing provision of care homes. Concern the private care homes are attracting in-migration of the elderly. Note that those moving into general market housing cannot be controlled but question whether care homes could be brought within S106 affordable housing policy [Abergavenny & District Civic Society].

	• Suggest historically disabled people have been let down in types of historic affordable housing provided. Refer to detailed considerations relating to houses for disabled people [Disability Advice Project]. • Notes it is highly unlikely that the affordable housing targets will be met and that a more innovative approach is needed as relying on the offering of market developers will not work. Suggests a different model of providing affordable housing needs to be set up with social landlords obtaining bank loans to redevelop brownfield sites and putting in the investment needed [Cllr Louise Brown]. • Suggests brownfield sites could be compulsory purchased and used for affordable housing provided there is sufficient retail, employment and community facilities in a local community area [Cllr Louise Brown]. • No land allocations for self-build market and/or affordable housing in the Preferred Strategy [Cllr Louise Brown] • Suggest the Council is failing to meet demand because it cannot force developers to bring sites forward if the sums don't add up, questions how the Council intend on solving this problem [Llangybi Fawr Community Council]. • Questions how affordability will be managed vs the aspiration to build green, suggests while green builds cost more the overall cost of ownership will be less, questions why developers would do this for less financial return [Private individual x 1]. • Should insist social housing is built first to see how fast developers step forward [Private individual x 1]. • Suggest affordable houses are only being built for people on benefits or those moving over from Bristol [Private individual x 1]. • Generally supportive of approach although note open market and mixed tenure developments also play a key role in contributing to the overall objectives of the sustainable and resilient communities strategy by providing a wider range in housing choice [Edenstone].
LPA Response	Detailed policy considerations in relation to aggregates and minerals are considered elsewhere in the Deposit Plan in S16 along with supporting Development Management policies. It is not considered appropriate or necessary to refer to net zero carbon homes in the affordable housing policy. A specific policy relating to Net Zero Carbon Homes (NZ1) is included elsewhere in the Deposit Plan as a Development Management. Affordable homes are available to different households with differing needs including older households. A specific Specialist Housing Policy (H7) is also included in the Deposit Plan as a detailed Development Management Policy. The CPO of brownfield sites is considered to be outside of the remit of the RLDP process. The Affordable Housing Policy framework however provides support for affordable housing in appropriate locations and any development proposals for affordable homes on brownfield sites would therefore be considered on a site-by-site basis. The Affordable Housing Policy framework however provides support for affordable housing in appropriate locations and any development proposals for self-build affordable homes would therefore be considered on a site-by-site basis. Self-build market homes would need to be considered against the Housing policy framework set out within the RLDP. Viability testing has been undertaken on all of the proposed site allocations in the Deposit RLDP. This assessment has been undertaken independently by a viability consultant on behalf of Monmouthshire County Council. This assessment has been undertaken independently by a viability consultant on behalf of Monmouthshire County Council, viability assessments have demonstrated that the proposed site allocations are viable based on the provision of 50% affordable housing. Different affordable housing thresholds are provided for other types of development and are set out in Strategic Policy S7. Viability appraisals may also be requested for other proposals, detail is set out in the supporting text of Strategic Policy S6 relating to Infrastructure. The viability testing of allocated sites includes consideration of the Council's net zero carbon requirements along with other necessary contributions and site-specific considerations. While these types of development may cost more from the outset developers can expect higher sale values. Details of the phasing of allocations including the timing of delivery of affordable housing to be agreed through trigger points in S106 agreements

	Affordable homes can be for Social Rent or Low Cost Home Ownership and provide for differing needs. Affordable Housing in Monmouthshire will only be allocated to people with a local connection to Monmouthshire. It should be noted that this is a policy approach outside of the remit of the RLDP which sits with Monmouthshire County Council's Housing team. New housing developments in both urban and rural areas should incorporate a mix of market and affordable house types, tenures and sizes to cater for the range of identified housing needs and contribute to the development of balanced communities. This approach is reflected in a specific housing mix policy within the RLDP. The affordable housing requirements in S7 must, however, be adhered to.
LPA Recommendation	No change required.

Question 9 – Do you have any comments on Strategic Policy S7 Preferred Strategic Site allocation?

A range of comments have been made on the preferred Strategic Sites with a total of 48 organisations or members of the public submitting a response to Question 9. Given the overlap, however, of this Preferred Strategic Sites question 9 and the site-specific allocations: Question 10 (Abergavenny East), Question 11 (Bayfield Chepstow) and Questions 12 (Caldicot East), as well as comments on these sites as part of the Candidate Sites Register Consultation (CS0213 Abergavenny East), (CS0098 Bayfield), and (CS0087 & CS0251 Caldicot East), these comments should be read in conjunction with these responses.

Main topics raised included over-reliance on the two larger strategic sites of Abergavenny East and Caldicot East and that the units proposed within these large sites would not be able to be delivered within the Plan period. It was also suggested that there is also over-reliance and over-development in the south of the County and concern that Monmouth does not have a strategic site.

The Key themes raised are set out below:

Key Theme	Summary of Points Raised
Abergavenny East	• Over reliance on a large site. Should site struggle to deliver or be delayed there will be significant implications for plan delivery [Leathdunn, UK Johnsey Estates]. • Timescale for delivery likely to be greater than anticipated as: site is under fragmented ownership; being promoted by a housing association which appears not to have secured planning permission for a site greater than 57 homes; significant infrastructure to be delivered in advance of housing [Barratt, David Wilson Homes]. • The Preferred Strategic site for Abergavenny would breach the existing defined Railway line and A465. The precise numbers that the strategic sites need to provide should be considered in relation to the number of homes that could be secured through appropriate 'additional sites' rather than the other way around. This would limit the area required beyond the A465 and ensure that smaller deliverable well-located sites which fit with the existing pattern of development of Abergavenny are allocated. This would be more in keeping with the historic development of the settlement [The Stantonbury Building and Development Company]. • The ISA acknowledges constraints to the deliverability of the proposed Strategic allocation at Abergavenny East stating that 'development will need to demonstrate phosphate neutrality and also identifies significant infrastructure to enable the delivery of the site, namely a cycle footway bridge over the A465 and railway [Marstons PLC].
LPA Response	The allocation on Land to the East of Abergavenny offers a significant opportunity for the future growth of Abergavenny through the provision of approximately 500 net zero carbon homes, 50% of which will be affordable, open space and community and commercial development. It also offers a

	significant opportunity for a park and ride facility to provide much needed parking provision for Abergavenny Railway Station as well as potential to open up opportunities to enhance the area around the railway station more generally. The integration of the site with the existing settlement is a key principle of the site's development and identifying connection links that provide crossings across the railway line and the A465 is a key focus of the site. A multi-agency approach has been taken to addressing this issue with in-principle support given from the key stakeholders including Welsh Government Highways Department, Transport for Wales and Network Rail details of which will be set out in a Statement of Common Ground between the Council and relevant parties. To ensure the site delivers on the key priorities of the RLDP, site specific policy requirements are set out in Policy HA1 – Land East of Abergavenny East. An Infrastructure Delivery Plan has also been prepared which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of the allocated sites. Site specific considerations are included as an appendix to the Deposit Plan. Anticipated delivery rates have been set out in the Housing Trajectory contained in Appendix 9 of the Deposit Plan. This demonstrates that the site can be delivered within the Plan period.
LPA Recommendation	Retain Land to the East of Abergavenny East as a Strategic Allocation, with site specific policy requirements set out in Policy HA1 – Land to the East of Abergavenny.
Caldicot East	• We note that the site in Caldicot is partially within areas of risk for flooding [NRW]. • We note multiple potential sites in Caldicot. Here the objective should be to provide for robust ecological corridors and habitat provision for biodiversity. We advise that in considering green infrastructure provision these sites are not considered in isolation but considered together to create robust, resilient, ecological networks [NRW]. • Over reliance on a large site. Should site struggle to deliver or be delayed there will be significant implications for plan delivery [Leathdunn, UK Johnsey Estates, Manor Farm Partnership, Private Individual x 3]. • Timescale likely to be greater than anticipated as: site is under fragmented ownership; promoted by a land promoter and local authority rather than a developer; significant infrastructure to be delivered in advance of housing [Barratt & David Wilson Homes]. • Caldicot East together with the Redwood building site in Portskewett and the proposal to build 60 on the old Depot Crick means the area will be subjected to fundamental change [Private Individual x1]. • Less homes should be expected to be delivered at Caldicot East. From adoption there would be 8 years to deliver 925 homes [Private Individual x1].
LPA Response	Comments noted. At the time of the Preferred Strategy consultation Land to the east of Caldicot site (previously known as Caldicot East) was proposed for 925 homes within the plan period. This number has been reduced in the Deposit Plan to approximately 770 homes. Land to the east of Caldicot provides the opportunity for a new neighbourhood of Caldicot with links to Portskewett to the east. The site is allocated as a residential-led mixed-use development delivering net zero carbon homes, of which 50% will be affordable, along with a primary school, a local centre, public open space, community facilities and B1 employment uses. The primary school will bring benefits for the wider community serving both the new development and nearby homes in both Caldicot and Portskewett. Infrastructure requirements are set out within the site allocation policy. An Infrastructure Delivery Plan has also been prepared which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of the allocated sites. Site specific considerations are included as an appendix to the Deposit Plan. The consideration of any designations (including ecological and heritage designations) and other constraints have been considered through the masterplanning process to date and referred to in the site allocation policy wording and supporting text.
LPA Recommendation	Retain Land to the East of Caldicot as a Strategic Allocation, with site specific policy requirements set out in Policy HA2 - Land to the east of Caldicot.

Bayfield /Chepstow	• Chepstow will have enhanced pressure from Forest of Dean developments [Cllr Louise Brown]. • Development on the edge of the town will have detrimental effects on local traffic and will not help generate significant town centre regeneration [The Chepstow Society]. • We are opposed to development west of the A466 particularly any development which would impact on the open land between Chepstow, Mathern and Pwllmeyric which has particular importance as a Gateway to Wales [The Chepstow Society]. • Traffic congestion in Chepstow will affect the viability of developments in SE Wales. Chepstow requires significant improvement to road infrastructure [Private Individual x1]. • Already pressure on Chepstow adding more homes would be irresponsible and not representative of the wishes of the local people of Chepstow [Private Individual x1]. • Land south of Mounton Road is Preferred Site [Private Individual x1]. • A466/Mounton Road - The area is known for its high-quality landscape and is the setting for Grade II listed St Lawrence House. It is important that St Lawrence House and its setting is preserved and that is views from the public vantage points are retained [Private Individual x1].
LPA Response	The Bayfield Site has not progressed to the Deposit Plan. In October 2023 a report of post consultation Preferred Strategy changes were agreed by Council. This included amending the strategic site in Chepstow from Bayfield to Land at Mounton Road on the basis that a mixed use had associated job creation and tourism benefits. See Candidate Sites Assessment Report for further information. A Green Wedge Assessment has been undertaken which includes an assessment of the appropriateness of existing Green Wedges, including that at Chepstow. The review concluded that on the land for Mounton Road the tree belt along St Lawrence Lane forms a strong boundary to land to the south-west, and the A48 forms a boundary to the south-east, limiting the impact that development at Mounton Road would have on adjacent land and on the remaining gap between Chepstow and Pwllmeyric. A Strategic Transport Assessment (STA) has been undertaken by TfW in order to understand the cumulative impact the proposed housing growth will have on Monmouthshire's transport network. The STA concludes a slight increase in traffic flows with the proposed Chepstow/ Severnside developments. Transport Assessments will be required to identify localised issues, set out specific mitigation and highway improvements to ensure traffic safety and capacity on the roads and that proposed development accords with the 'Sustainable Transport Hierarchy'. An infrastructure Delivery Plan (IDP) has also been prepared which sets out the highway infrastructure requirements for the site. To ensure the Mounton Road site delivers on key priorities such as preservation of its grade II listed setting parkland and transport and traffic mitigation solutions, placemaking requirements will be set out in Strategic Policy S8 and Policy HA3.
LPA Recommendation	A strategic site in Chepstow is considered necessary to the Council's growth and spatial strategy - Chepstow is one of Monmouthshire's Primary settlements and our spatial strategy is to direct growth towards Monmouthshire's most sustainable settlements. New housing will deliver the Council's objectives of providing affordable net zero carbon homes in the locality. Policy HA3 – Land at Mounton Road – of the Deposit Plan sets out placemaking and infrastructure requirements associated with this site. The Infrastructure Delivery Plan (IDP) will set out how this will be delivered.
Over reliance on Strategic sites	• Concerns with the over reliance on 2 large sites. More proportionate distribution should be planned for considering appropriate sites in the Secondary and Main Rural Settlements [Johnsey Estates 2020 Ltd]. • The three Strategic sites would account for almost 72% of the total RLDP new housing allocations and consider this puts the Council into considerable over-reliance [Marstons PLC]. • A greater diversity of sites should be put forward across a range of main settlements and sustainable rural settlements so as to best protect the agility of housing growth and avoid infrastructure delays and viability issues. This approach is consistent with the aspirations of FW2040 to support

	growth, rural communities, and the rural economy as well as ensure ambitious affordable housing and net zero objectives are achieved [Marstons PLC].
LPA Response	The Deposit Plan allocates 18 residential/mixed use sites. Whilst it is recognised that two of the strategic sites (HA1 – Land to the East of Abergavenny and HA2 – Land to the East of Caldicot) account for 1,270 homes, there are a further 16 residential allocations ranging in size from 15 units to 270 units contributing to housing delivery in the County. Furthermore, in October 2023 a report of post consultation Preferred Strategy changes was agreed by Council. An increase in the flexibility rate from 10% to 15% was one of the changes agreed. This increased the housing provision figure from 5,940 (10% flexibility) to 6,210 (15% flexibility). The change seeks to ensure that the strategic sites at Abergavenny East and Caldicot East are sufficiently large to deliver the required infrastructure whilst also allowing for the allocation of a handful of smaller sites across the County to sustain and enhance existing communities. Increasing the flexibility ensures that the plan is more robust and resilient as there is delivery in the short-term term while the large strategic sites take time to be developed out. An increased flexibility will result in the Plan being able to provide a range and choice of sites and ensure that the plan is not solely reliant on the delivery of larger strategic sites which are more complicated to develop. A range of smaller sites will ensure the delivery of much needed affordable housing after the adoption of the plan to start addressing this current unmet affordable housing need. A housing trajectory has been prepared as part of the Deposit Plan, which demonstrates housing delivery rates throughout the Plan period can be achieved.
LPA Recommendation	No change required.
Deliverability	• Impractical that undeliverable Strategic housing allocations within Abergavenny, Chepstow and Caldicot represent 81% of new housing allocations. To ensure the policy meets the test of soundness smaller developer led allocated sites should be brought forward. This would provide a range and choice as well as greater flexibility over the housing trajectory [Edenstone, Grove Farm Estates, The Stantonbury Building and Development Company (1694), Vistry, Private Individual x2]. • It is well evidenced in Lichfields 'Start to Finish: What factors affect the Build Out Rates of Large-Scale Housing Sites?' paper that sites of more than 500 dwellings can take between 5-8.4 years for the first home to be delivered. Considering this, it would hugely affect the deliverability of unit numbers stated throughout the plan period. The need for smaller additional allocations is therefore imperative to achieve growth targets [Persimmon Homes, Barratt & David Wilson Homes]. • The current under delivery of dwellings against the annual requirement in the current adopted LDP is largely attributed to slower progress on larger strategic sites than anticipated (MCC AMR 2014-2019). This is due to long lead times to implement infrastructure prior to delivery of units [Edenstone].
LPA Response	The Deposit Plan allocates 18 residential/mixed use sites. Whilst it is recognised that two of the strategic sites (HA1 – Land to the East of Abergavenny and HA2 – Land to the East of Caldicot) account for 1,270 homes, there are a further 16 residential allocations ranging in size from 15 units to 270 units contributing to housing delivery in the County. Furthermore, in October 2023 a report of post consultation Preferred Strategy changes was agreed by Council. An increase in the flexibility rate from 10% to 15% was one of the changes agreed. This increased the housing provision figure from 5,940 (10% flexibility) to 6,210 (15% flexibility). The change seeks to ensure that the strategic sites at Abergavenny East and Caldicot East are sufficiently large to deliver the required infrastructure whilst also allowing for the allocation of a handful of smaller sites across the County to sustain and enhance existing communities. Increasing the flexibility ensures that the plan is more robust and resilient as there is delivery in the short-term term while the large strategic sites take time to be developed out. An increased flexibility will result in the Plan being able to provide a range and choice of sites and ensure that the plan is not solely reliant on the delivery

	of larger strategic sites which are more complicated to develop. A range of smaller sites will ensure the delivery of much needed affordable housing after the adoption of the plan to start addressing this current unmet affordable housing need. A housing trajectory has been prepared as part of the Deposit Plan, which demonstrates housing delivery rates throughout the Plan period can be achieved.
LPA Recommendation	No change required.
Infrastructure	• There is no spare infrastructure capacity in the south of the County to support the proposed developments. Any reinforcement of infrastructure will demand significant expenditure [Mathern Community Council, Cllr Louise Brown], Private Individual x1]. • Preferred Strategic sites in Caldicot and Chepstow are unworkable and cannot be accommodated due to infrastructure constraints, particularly High Beech roundabout [Cllr Louise Brown, Private Individual x1]. • Train worker strikes and unreliable Bus services make commuting by car much more likely [Cllr Louise Brown]. • Development should be largely in the North of the County as the Heads of the Valleys Road infrastructure has been improved [Cllr Louise Brown].
LPA Response	An Infrastructure Delivery Plan has been prepared which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of the proposed allocated sites. Site specific considerations are included as an appendix to the Deposit Plan. Strategic Policy S6 sets out the Councils approach to Infrastructure requirements for development proposals. There are also other detailed policies within the Deposit Plan relating to sustainable transport and transport schemes. Policy ST5 identifies numerous transport schemes identified in the Local Transport Strategy that will be supported, including active travel, public transport improvements and road schemes.
LPA Recommendation	No change required.
Overdevelopment/ growth too high	• The Southern area of the County already has 80% of the development and this plan combined with the candidate sites and development from the previous LDP will lead to overdevelopment of this area of Monmouthshire [Cllr Louise Brown, Private Individual x1]. • The RLDP should look to the brownfield sites to develop more affordable housing and just continue with the site already approved in the existing LDP which of their own will create additional traffic problems [Cllr Louise Brown]. • The overall scale of development around identified areas will destroy the very character that makes these locations desirable and increase the problems of traffic and lack of access to services [Private Individual x3].
LPA Response	Spatially, the Plan's growth is considered to be well distributed throughout the County to help address affordability issues across Monmouthshire. The southern settlements of Chepstow and Caldicot (including the Severnside area) account for 48% of the housing growth proposed and the northern primary settlements of Abergavenny and Monmouth account of 37%. It is recognised that Caldicot and the Severnside cluster account for 35% of housing growth, however, Welsh Government acknowledge the strong functional linkage with Newport, Cardiff and Bristol and "the concentration of new growth primarily in Caldicot and the Severnside area should reduce the potential to negatively impact on environmental assets and avoid consequences for climate and nature emergencies". Overall, the spatial strategy and identification of suitable sites for allocation is considered appropriate and reflect the site search sequence outlined in national planning policy. Brownfield opportunities have been considered through the site selection and candidate site process however, given the limited brownfield opportunities in a Monmouthshire context, greenfield opportunities have had to be considered to meet the housing and employment requirements.

LPA Recommendation	No change required.
Spatial Distribution	• Support the focussing of housing development on the primary settlements as better access to services and sustainable transport. Secondary and rural settlement dependent on the car [Usk Civic Society]. • Sites closed to existing shops and amenities should be supported [Private Individual x1]. • Growth is focussed on the wrong location to tackle the affordability crisis [Private Individual x1].
LPA Response	Support for spatial distribution of growth is welcomed. The Settlement Hierarchy set out in Policy S2 reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. The SSA confirms the dominant role of the primary settlements of Abergavenny, Chepstow, Caldicot and Monmouth, with this reflected in 85% of the level of housing growth proposed in these settlements. Spatially, the growth is considered to be well distributed throughout the County to help address affordability issues across Monmouthshire. Overall, the spatial strategy and identification of suitable sites for allocation is considered appropriate and reflect the site search sequence outlined in national planning policy.
LPA Recommendation	No change required.
Urban Sprawl	• Candidate Sites are grouped too closely together so current outlying villages identities and sense of community lost [Private Individual x1].
LPA Response	The grouping of the Candidate Site submissions as shown in the Candidate Site Register is a record of where candidate sites have been received by the Council for consideration for allocation in the RLDP. The Council received over 150 candidate site submissions as part of the Second Call for Candidate Sites during July and August 2021, most of which have not been allocated in the Deposit Plan. Details of the recommendation for each candidate site are set out in the Candidate Site Assessment Report.
LPA Recommendation	No change required. Refer to the Candidate Site Assessment Report for site specific candidate site recommendations.
Limited Information	Limited information has been provided at this stage in relation to these sites. Further evidence is required to justify the deliverability and suitability of the strategic sites and the number of homes that can be attributed to them having regard to site capacity and the delivery timescales. Question the decision to include specific sites within the Preferred Strategy before detailed assessments have been carried out [Vistry, Marstons PLC].
LPA Response	The information set out in the Preferred Strategy was appropriate for that stage in the development plan process. Preferred Strategic Site Allocations were identified for the Primary Settlements, informed by a high-level assessment. The level and detail of evidence has increased as the Plan has progressed, with the Deposit Plan being supported by a robust and comprehensive evidence base including viability assessments.
LPA Recommendation	No change required. Reader is directed to the RLDP evidence base for further details.
Monmouth	• Object to the failure to provide for a strategic allocation within Monmouth [Redrow Homes, Hallam Land Management Ltd]. • Council should programme an early review of the RLDP and safeguard land at Monmouth earmarking for development. It is not considered the RLDP addresses the shortfall in affordable housing in Monmouth itself which will have social issues beyond homelessness [Manor Farm Partnership, Private Individual x3].

	• Request that MCC continue to prioritise the finding of a solution to the phosphate issue in Monmouth and continue to engage with site promoters on land in Monmouth [Edenstone, Richborough Estates].
LPA Response	The Preferred Strategy (2022) proposed no new site allocations in Monmouth, or within the upper River Wye catchment north of Bigsweir Bridge and also assumed no existing planning permissions or small/windfall sites could come forward. This approach was taken due to the lack of an identified strategic solution to the treatment of phosphates at the Monmouth Wastewater Treatment Works (WwTW) within the Plan period. Welsh Government's response letter to the 2022 Preferred Strategy advised that new site allocations should be made in Monmouth on the basis that sufficient certainty is provided by DCWW's planned improvements at the Monmouth Wastewater Treatment Works by 31st March 2025. Following Welsh Government's confidence in the removal of this constraint, Council agreed in October 2023 to the identification of a strategic site in Monmouth as well as including allowances towards windfall and infill allowances and existing commitments already with planning permission.
LPA Recommendation	In accordance with the October 2023 Council decision, the Deposit Plan allows for growth in Monmouth.
Brownfield Sites	• Role of brownfield sites in non-isolated rural locations should play an important role in the delivery of the growth strategy [Private Individual x1]. • Seems no real attempt has been made to identify brownfield sites in the area. Caldicot East is currently farmland or showground [Private Individual x1].
LPA Response	Brownfield opportunities have been considered through the site selection and candidate site process however, given the limited brownfield opportunities in a Monmouthshire context, greenfield opportunities have had to be considered to meet the housing and employment requirements.
LPA Recommendation	No change required.
Phosphates	• Strict approach to exclude development in Monmouth could be extended to other areas, including Usk because while a solution to the phosphorus problem may have been found at the Llanfoist sewage works it cannot address pollution including raw sewage which arises below Llanfoist [Usk Civic Society].
LPA Response	Welsh Government's response letter to the Preferred Strategy (2022) advised that new site allocations should be made in Monmouth on the basis that sufficient certainty is provided by DCWW's planned improvements at the Monmouth Wastewater Treatment Works by 31st March 2025. The Welsh Government's confidence in the removal of this spatial and environmental constraint means the RLDP now allocates new affordable housing-led development within Monmouth. Since the phosphate guidance was introduced by NRW, Monmouthshire County Council has been working collaboratively with a range of organisations including NRW, Dŵr Cymru Welsh Water (DCWW), Welsh Government, other Councils in Wales and England, environmental groups, developers and other stakeholders to try to establish solutions that will ensure that development proposals do not have an adverse impact on water quality within the SAC rivers. Planning applications are required to satisfy NRW's requirements to receive a favourable decision. However, some agricultural activities such as fertiliser spreading and muck spreading fall outside of the Council's control and are in part regulated by Natural Resources Wales (or the Environment Agency in England) and are in part unregulated. The Welsh Government is currently considering the introduction of additional controls over such activities.
LPA Recommendation	In accordance with the October 2023 Council decision, the Deposit Plan allows for growth in Monmouth. More generally, the Council will continue to work collaboratively with NRW, Dwr Cymru and other relevant organisations to ensure the RLDP satisfies the relevant water quality requirements.

Green Infrastructure	• Essential that site selection and development design are informed by GI considerations [NRW].
LPA Response	Agreed. GI considerations have played an important part in site selection and design with GI masterplan/GI assets and opportunities plan required as part of the ongoing site allocation masterplans. Furthermore, the Deposit Plan includes Policy GI1 – Green Infrastructure which requires development proposals to maintain, protect and enhance the integrity and connectivity of Monmouthshire GI network, as well as site specific GI requirements set out in Policies HA1 – HA18.
LPA Recommendation	Continue to make GI considerations a critical element of the ongoing site masterplanning process.
Landscape	• Given the high quality of Monmouthshire's landscapes, detailed landscape assessment should be included in site assessments [NRW]. • Where strategic growth areas either include or adjoin areas of ancient woodland we refer you to our standing Natural Resource Wales Advice Note proposals affecting Ancient Woodland [NRW].
LPA Response	Comments noted. Landscape assessments have informed the site selection process.
LPA Recommendation	Agree that landscape assessments should be included in site assessments and regard is given to NRW's Ancient Woodland Guidance Note, where relevant.
Protected Species/Sites	• Strategic allocations must have regard to protected species – happy to assist internal ecologists. Monmouthshire has a number of internationally and nationally protected sites. Development must not have a likely a significant effect on the designated features of these sites, directly or indirectly or cumulatively. A Habitats Regulations Assessment may need to be undertaken [NRW] • Proposals disruptive to local wildlife [Private Individual x1].
LPA Response	Site allocations have been made in consultation with our Ecologist and an Ecological Assessment is a requirement of the candidate site submission process. A Habitats Regulations Assessment has been undertaken on the Deposit Plan.
LPA Recommendation	Continue to liaise with MCC's Ecologist and NRW.
SPZs	• Any development sites in SPZs need to connect to the public sewer network [Usk Civic Society].
LPA Response	Comments noted. The Deposit Plan notes this at paragraph 11.13.8 and 11.13.9.
LPA Recommendation	No change required.
Foul Drainage	• Important that areas for growth do not put unsustainable pressure on other foul drainage networks and this needs to be considered in liaison with Welsh Water [NRW]. Around the County, sewers discharge directly into the Wye and River Usk due to inadequate connections to sewage works or from storm overflows. These contribute to phosphate pollution. How will this problem be resolved for the new housing developments [NRW].
LPA Response	The Council has been working collaboratively with a range of organisations including NRW, Dŵr Cymru Welsh Water (DCWW), Welsh Government, other Councils in Wales and England, environmental groups, developers and other stakeholders to establish solutions that will ensure that development proposals do not have an adverse impact on water quality within the SAC rivers. The areas for growth and site allocations have been prepared with regard to Dwr Cymru's planned improvements to waste water treatment works and NRW's review of permits.

	Commitment from DCWW to establish what capacity (if any) exists to enable development proposals to come forward while ensuring betterment or neutrality of phosphate levels has provided the necessary confidence to support the RLDP strategy.
LPA Recommendation	The Deposit Plan has been updated to reflect the updated position that DCWW are committed to implement sewerage waste water treatment improvements. The Deposit Plan has been updated to reflect the updated position that DCWW are committed to implement sewerage waste water treatment improvements.
Health & Wellbeing	• Strategic sites in the south will be detrimental to the tourist industry and lead to increased air pollution contrary to the council declaring a climate emergency and detrimental to the health and well-being of existing residents [Cllr Louise Brown]. • Consuming all the open green spaces that are essential for mental health. Places need to be nice to live and not built upon every square inch [Private Individual x1].
LPA Response	The Deposit Plan and its allocations have been subject to Habitats Regulations Assessment which involved high-level traffic modelling to assess atmospheric pressures on the environmental designations in the County. This process did not raise any concerns in relation to the strategic sites in the south and in impacts of air pollution on the environmental designations in the south of the County. In addition, site specific air quality assessments will be required as part of the planning application process. Brownfield opportunities have been considered through the site selection and candidate site process however, given the limited brownfield opportunities in a Monmouthshire context, greenfield opportunities have had to be considered to meet the housing and employment requirements.
LPA Recommendation	No change required.
Minerals & Waste	• Delivery of strategic sites is reliant on the supply of aggregates and mineral products [Mineral Products Association]. • Is imperative that new sites do not impact upon Mineral Safeguarding Areas [Mineral Products Association].
LPA Response	Comments noted. Given the extensive mineral reserves identified in the County, it is extremely challenging to identify edge of settlement locations that do not correspond with either Category 1 or Category 2 reserves. In this respect, allocations have been made within Mineral Safeguarding Areas. However, in doing so the following factors have been balanced: the overriding need for the development meet housing and employment needs, edge of settlement location, within 200m of sensitive development or the site has an extant planning permission or forms part of an existing Adopted LDP allocation.
LPA Recommendation	No change required.
National Grid Capacity	• We have first-hand experience of working with solar developers in undertaking grid capacity assessments and there is no grid capacity for renewable project in the Severnside Region. There will need to be significant investment in power infrastructure to meet the carbon zero aspirations. This is also the same for general capacity upgrades to handle EV fast charging points and air source heat pumps [BB3 Limited, Private Individual x1]. • Grid capacity will restrict renewable energy developments [Manor Farm Partnership, [Private Individual x2].
LPA Response	Comments noted. We recognise the grid capacity challenges and have liaised with National Grid in preparing the Plan and alongside site promoters consulting National Grid directly with regards to site specific requirements.
LPA Recommendation	Continue to liaise with National Grid.

Net Zero Carbon Ready	• Should be built to the highest environmental standards and not the minimum standards to achieve 'net carbon ready' [Private Individual x1].
LPA Response	In October 2023 a report of post consultation Preferred Strategy changes agreed to enhance the sustainability credentials and energy efficiency of the homes that are to be constructed to be net zero carbon homes rather than net zero ready homes. Further details are set out in Policy NZ1 – Monmouthshire Net Zero Carbon Homes and the associated supporting evidence.
LPA Recommendation	As agreed by Council in October 2023, incorporate a policy requirement for new homes to be net zero carbon homes.
Collaborative working	• Welcome collaboration that considers the cumulative impact of development [Torfaen Council].
LPA Response	Comments welcomed.
LPA Recommendation	Continue to work collaboratively with Torfaen County Council.
General /other	• Land at St Lawrence Lane should be included within the RLDP as a strategic site allocation [Vistry]. • South west of Llanfoist is not as constrained and should be included as a Preferred Strategic Site allocation. It is of a similar size to the proposed strategic site in Chepstow [Grove Farm Estates]. • Strongly consider that the RLDP should include sites that cater specifically for the older population [Grove Farm Estates]. • Notwithstanding Strategic allocation it is contended that the employment land provision would appear secondary to these allocations and might likely be uncapable of making significant contribution to the target of 6240 additional jobs in Monmouthshire [Private Individual x1]. • Usk is not on this register [Private Individual x1]. • Magor/Undy has constant development. New settlement at St Brides absurd [Private Individual x1]. • Comments in relation to Land west of Rockfield Road being filtered out at this stage [Hallam Land Management Ltd].
LPA Response	Candidate site submissions have been considered as part of the candidate site assessment. Individual site recommendations can be viewed in the Candidate Sites Assessment Report. The Deposit Plan provides the policy framework to allow for the consideration of specialist housing to come forward throughout the Plan period (Policy H7 – Specialist Housing), which includes the housing requirements of older people. The level of employment land (B Use Class) allocated is based on the findings of the Employment Land Review which recommended that a minimum of 38ha of B Use Class employment land is identified in the Deposit Plan, based on past take up rates rather than the projected job figure. The Preferred Strategy only identified Preferred Strategic Site Allocations. Allocations in the lower tier settlements such as Usk were not included at that stage. The Deposit Plan includes details of the site-specific allocations at all levels of the settlement hierarchy, with policy HA11 – Land East of Burrium Gate allocated in Usk. There are no new allocations identified for the Magor/Undy area, however, the developments at Vinegar Hill and Rockfield Farm, Undy to contribute to the existing commitments element of the housing supply. The RLDP does not propose a new settlement at St Brides as paragraph 3.53 of PPW12 states that "due to their strategic nature new settlements should only be proposed as part of a joint LDP, an SDP or Future Wales. This is due to their significance and impacts extending beyond a single local authority."

LPA Recommendation	No change required.

Question 10 – Do you have any comments on Strategic Policy S7 Preferred Strategic Site Allocation: a) Abergavenny East?

34 organisations or members of the public submitted a response to question 10 relating to Strategic Site Allocation S7a: Abergavenny East. Comments ranged from recognising the significant role the Abergavenny East site could play in contributing to the county's housing needs to raising concerns regarding the likely timescales in bringing a strategic site of this nature forward and potential impact on the RLDP's delivery trajectory. The importance of including a crossing over the A645 to the site's overall accessibility and placemaking credentials were noted along with the impact this could have on deliverability, viability, and timescales. Master planning the site to ensure it forms part of Abergavenny rather than a satellite settlement were also noted.

Key Theme	Summary of Points Raised
Supportive Comments	• Accept site has potential to provide a mixed development subject to guarantees that the considerable infrastructure challenges are fully costed and delivered and site is integrated with the rest of the town. [Abergavenny Town Council, SOUL, Abergavenny & District Civic Society] • Support the allocation which will make a significant contribution to achieving and realising the housing and economic development needs of Abergavenny and the County. [MHA, Private Individual] • Site can play a significant role in contributing to affordable housing targets, particularly given the site promoter is MHA. [MHA] • Support the allocation which can be enhanced through the allocation of additional land to better connect the site to the existing settlement. [The Coldbrook Estate]
LPA Response	Support for the Abergavenny East Strategic Site Allocation welcomed. The allocation offers a significant opportunity for the future growth of Abergavenny through the provision of approximately 500 net zero carbon homes, 50% of which will be affordable, open space and community and commercial development. It also offers a significant opportunity for a park and ride facility to provide much needed parking provision for Abergavenny Railway Station as well as potential to open up opportunities to enhance the area around the railway station more generally. To ensure the site delivers on the key priorities of the RLDP, site specific policy requirements are set out in Policy HA1 – Land East of Abergavenny East.
LPA Recommendation	Retain Land to the East of Abergavenny East as a Strategic Allocation, with site specific policy requirements set out in Policy HA1 – Land to the East of Abergavenny.
Objection Comments	• No certainty that the site will be able to deliver the quantum of homes that the RDLP estimates over the RLDP plan period as there is no site developer interest and also significant infrastructure costs associated with bringing the site forward which would impact on delivery rates and timescales. Based on Lichfield's Start to Finish (2nd Ed, Feb 2020) research, the most the site can estimate to deliver is 340 units. Under delivery at Abergavenny East would raise concerns in relation to the soundness of the plan. [B & DW, Hallam Land Management Ltd, Taylor Wimpey, Edenstone Homes, Edenstone Group, Bellway Homes, Tompkins Thomas Planning, Candleston Homes, Edenstone] • Delayed delivery of Abergavenny East would impact on the delivery of affordable homes. [Hallam Land Management Ltd] • Surprised site has been identified as a longer-term direction of growth given initial infrastructure requirements and sensitive location of the site. [Melin Homes, Llanarth Estates, Tirion Homes, Candleston Homes, Sero Homes, Sero, Private Individuals x 2] • Alternative Abergavenny strategic site options perform better in the ISA than Abergavenny East. [Hallam Land Management Ltd]

	• Site has not been correctly assessed from a landscape perspective. Site would impact on the landscape setting. [Tompkins Thomas Planning, Private Individuals x 3]
LPA Response	The allocation on Land to the East of Abergavenny offers a significant opportunity for the future growth of Abergavenny through the provision of approximately 500 net zero carbon homes, 50% of which will be affordable, open space and community and commercial development. It also offers a significant opportunity for a park and ride facility to provide much needed parking provision for Abergavenny Railway Station as well as potential to open up opportunities to enhance the area around the railway station more generally. The integration of the site with the existing settlement is a key principle of the site's development and identifying connection links that provide crossings across the railway line and the A465 is a key focus of the site. A multi-agency approach has been taken to addressing this issue with in-principle support given from the key stakeholders including Welsh Government Highways Department, Transport for Wales and Network Rail, details of which will be set out in a Statement of Common Ground between the Council and relevant parties. To ensure the site delivers on the key priorities of the RLDP, site specific policy requirements are set out in Policy HA1 – Land East of Abergavenny East. An Infrastructure Delivery Plan has also been prepared which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of the allocated sites. Site specific considerations are included as an appendix to the Deposit Plan. Anticipated delivery rates have been set out in the Housing Trajectory contained in Appendix 9 of the Deposit Plan. This demonstrates that the site can be delivered within the Plan period. Landscape assessments have informed the site allocation process.
LPA Recommendation	Retain Land to the East of Abergavenny East as a Strategic Allocation, with site specific policy requirements set out in Policy HA1 – Land to the East of Abergavenny.
Infrastructure	• Hydraulic Modelling Assessment (HMA) of both the water supply and public sewerage networks will be required to determine the level of reinforcement works required to accommodate the proposed development. There are no issues in the foul flows from this site being accommodated at the Llanfoist WwTW. Subject to regulatory approval, intend to introduce phosphorous removal at the Llanfoist WwTW by the end of 2025. [Dwr Cymru] • Site would impact on highway capacity and flood risk. [Private Individuals x 2]
LPA Response	The site promoters are aware of the need to undertake a Hydraulic Modelling Assessment as part of the planning application process. The site is not within a flood risk area as identified by Welsh Government's Development Advice Maps or the Flood Map for Planning. A Strategic Transport Assessment has been undertaken to inform the RLDP, and site specific Transport Assessments will be required to identify localised issues and set out specific mitigation and highway improvements.
LPA Recommendation	Continue to liaise with the site promoters and infrastructure providers.
Foot bridge/A465 crossing	• Firm commitment to the early provision of a suitable active travel crossing of the A465 is required to ensure support for the proposal. [Abergavenny & District Civic Society, Abergavenny Transition Town] • Introduction of a bridge over the A465 would result in significant viability and deliverability issues – estimated costs of up to £7m. Will require extensive design and land ownership negotiations which will impact on delivery timescales. [Hallam Land Management Ltd, Taylor Wimpey], Edenstone Homes, Bellway Homes]

	• Abergavenny East does not offer any form of sustainable access and there will need to be significant infrastructure improvements to enable the site to be considered to be sustainably located. [Taylor Wimpey] • A new Station Interchange for Abergavenny Rail Station would be created. This would include the provision of a footbridge across the A465 and a Rail Park & Ride site (which is being promoted by WG/TfW). A new accessible footbridge is proposed following the Department for Transport funding secured via the Access for All announcement in April 2019. [MHA]
LPA Response	The allocation on Land to the East of Abergavenny offers a significant opportunity for the future growth of Abergavenny through the provision of approximately 500 net zero carbon homes, 50% of which will be affordable, open space and community and commercial development. It also offers a significant opportunity for a park and ride facility to provide much needed parking provision for Abergavenny Railway Station as well as potential to open up opportunities to enhance the area around the railway station more generally. The integration of the site with the existing settlement is a key principle of the site's development and identifying connection links that provide crossings across the railway line and the A465 is a key focus of the site. A multi-agency approach has been taken to addressing this issue with in-principle support given from the key stakeholders including Welsh Government Highways Department, Transport for Wales and Network Rail details of which will be set out in a Statement of Common Ground between the Council and relevant parties. To ensure the site delivers on the key priorities of the RLDP, site specific policy requirements are set out in Policy HA1 – Land East of Abergavenny East. An Infrastructure Delivery Plan has also been prepared which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of the allocated sites. Site specific considerations are included as an appendix to the Deposit Plan.
LPA Recommendation	Retain Land to the East of Abergavenny East as a Strategic Allocation, with site specific policy requirements set out in Policy HA1 – Land to the East of Abergavenny. Continue to liaise with the relevant agencies to progress the connection links across the A465 and the railway line.
Masterplanning/ Assessments	• Masterplan for the development is essential and required as part of the RLDP to avoid the site becoming a satellite settlement. [Abergavenny Town Council, Abergavenny & District Civic Society, SOUL, Tompkins Thomas Planning, Private Individuals x 2] • NRW set out detailed assessments and factors that may need to be considered as part of the allocation including landscape, biodiversity, and drainage. [NRW] • Significant site assessment and master planning works have been undertaken to date by the site owners and promoters. This has been prepared based on high level site, context, and transport analysis. The site presents an opportunity to create a high-quality new neighbourhood. [MHA]
LPA Response	Land to the East of Abergavenny offers an excellent opportunity to create a sustainable, vibrant mixed-use neighbourhood destination. A masterplan, establishing a design code and land use parameters is key to the progression of the site. In this respect, input from the Design Commission for Wales has helped shaped the site's progression to date and we will continue to liaise with DCfW as the site progresses through the development plan process and planning application process. A masterplan establishing key design and placemaking principles is being prepared and will be agreed with the Local Planning Authority prior to the determination of any planning application. As noted by Monmouthshire Housing Association (the site promoters) significant site evidence assessments have been undertaken and are ongoing as dialogue continues with the relevant agencies as part of the development plan preparation process.
LPA Recommendation	Retain Land to the East of Abergavenny East as a Strategic Allocation, with site specific policy requirements set out in Policy HA1 – Land to the East of Abergavenny. Continue to liaise with the relevant agencies to progress the masterplanning and evidence base for the site.
Sites promoted in response to question 20	• Edenstone Homes – consider CS0094 Penlanlas Farm would be more appropriate [Edenstone]. • Bellway Homes – CS0250 – Evesham Nurseries – [Bellway] • Tompkins Thomas Planning – CS00056 – South of Brecon Road [Tompkins Thomas Planning]

LPA Response	Candidate site submissions have been considered as part of the candidate site assessment. Individual site recommendations can be viewed in the Candidate Sites Assessment Report.
LPA Recommendation	See the Candidate Sites Assessment Report for candidate site recommendations.

Question 11 – Do you have any comments on Strategic Policy S7 Preferred Strategic Site allocation b) Bayfield Chepstow?

48 organisations or members of the public submitted a response direct to S7 (b) regarding the Preferred Strategic Site at Bayfield Chepstow. (These comments should also be read in conjunction with Question 9 - S7 'Strategic Sites' and comments received under 'CS0098' on the accompanying Candidate Site Register consultation responses.
Overall key concerns were that prior to any development in Chepstow, infrastructure improvements are needed in relation to improvements of services, such as GP, schools and community services, as well as improvements to highway infrastructure. Many responses indicated that Chepstow already experiences problems with congestion and traffic, particularly at Highbeech Roundabout and there is also the concern and consideration of cumulative impact with proposed development of circa 1,000 homes at Severnside (CS0087& CS0251), as well as proposed new development in bordering English counties, such as 2,460 homes in Lydney, Forest of Dean. There is concern that further development will worsen air pollution already experienced at Hardwick Hill, which is within an Air Quality Management Area (AQMA).
In terms of the Bayfield site, there was an overarching concern in relation to impact the proposal would have upon the setting of the adjacent Wye Valley National Landscape (AONB), particularly as previous planning applications have been refused on this land, and part of the reason was the harm development had on the setting of the AONB.
Comments received have queried whether the Mounton Road site (CS00165) was more sustainable as this site proposes a 'mixed use' including employment uses and is perceived to be closer for walking and active travel links to Chepstow's town facilities and will not impact upon the AONB.
Other comments relate to it being positive that the Bayfield site is able to deliver affordable net zero ready housing with the placemaking and master-planning process to be undertaken prior to allocation. However, comments have challenged whether this will be viable, and actually be delivered, for example 'Fairfield Mabey only delivered 22 affordable housing units'. There were also concerns in relation to out- commuting and that the development is to serve the populations of Bristol and the south west England, rather than local people.
Other concerns relate to development on greenfield land which has implications for Best Most Versatile (BMV) agricultural land, impacts upon ecology and heritage and whether identification of this this greenfield site is appropriate ahead of the green belt review as set out in Future Wales 2040.
The key themes raised are set out below:

Key Theme	Summary of Points Raised
Housing delivery	• Can make a meaningful contribution to the delivery of the housing and job growth rates set out in the Plan. The site could deliver a range of home over the plan period and is in one ownership and direct control of BDW. The site is deliverable early after the plan adoption [BDW]. • Considered the allocation would fail Test 3 of the Council's own Test of Soundness which are reflected in Section 64(2) of the 2004 Act and the Development Plans Manual. The proposed allocation will not deliver and it's not realistic or appropriate and is not founded on a robust and credible evidence base [Hallam Land Management Ltd, Taylor Wimpey, Edenstone Homes, Bellway Homes, Bellway Homes]. • Any large areas of house building in Chepstow would require both affordable housing and major infrastructure improvements. Housing developments will claim that schemes are not viable due to affordable housing provision and infrastructure requirements [Private Individual x1].
LPA Response	The Bayfield Site has not progressed to the Deposit Plan. In October 2023 a report of post consultation Preferred Strategy changes was agreed by Council. This included amending the strategic site in Chepstow from Bayfield to Land at Mounton Road on the basis that a mixed use development had associated job creation and tourism benefits. See Candidate Sites Assessment Report for further information.

	In terms of delivering the affordable housing, the sites have been through viability assessments prior to the allocation process. A statement of common ground and Site Placemaking Policy HA3 will also tie the developers of the Chepstow site to delivering the 50% affordable housing requirement. Similarly, infrastructure requirements have been considered as part of demonstrating viability for proposed allocations and the Infrastructure Delivery Plan (IDP) will set out how this Infrastructure will be delivered.
LPA Recommendation	The Bayfield Site has not progressed to the Deposit Plan. In accordance with the October 2023 Council decision, a mixed use residential and employment allocation of approximately 146 homes is to be allocated at Land at Mounton Road, Chepstow. Site specific policy requirements are set out in Policy HA3 – Land at Mounton Road Chepstow. Refer to the Infrastructure Delivery Plan –for further details on the Infrastructure requirements as a result of the proposed allocation at Land at Mounton Road.
Housing growth	• Growth is justified in the town in order to address current shortfall [Barwood]. • 145 houses is modest and will have little impact on already the disastrous levels of congestion and pollution however would be prudent to delay development until solved [Mr Martin Andrews]. • How can you be certain there is demand for the quantity of new houses within the County? Development in Chepstow is for the residents of Bristol. The Fairfield Mabey site was marketed to mostly Bristol residents [Private Individual x3]. • Welsh Government Policy is to focus housing to Cardiff, Newport and Valley area. MCC should be respectful of this and adopt a policy of very limited new house development to preserve the rural nature of the County and not add infrastructure issues [Private Individual x1]. • To build in areas outside recommendation from the Welsh Government means Monmouthshire and towns like Chepstow are unlikely to get much attention in any budget allocation [Private Individual x1].
LPA Response	The level of growth set out in the Preferred Strategy (2022) was informed by a wide range of evidence and responded to a number of challenges that had arisen throughout the plan making process. It is considered that the level of growth proposed in Chepstow is sustainable and proportionate to address local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency and having regard to Welsh Government's concerns regarding alignment with Future Wales. In the Preferred Strategy (2022) consultation Welsh Government did not object to our level of growth in that it reflects the urgent need to increase the supply of affordable housing in Monmouthshire. Welsh Government agreed the Strategy's conformity with Future Wales. In October 2023, a number of post-consultation updates to the Preferred Strategy (2022) were endorsed by Council forming the basis for the level of growth set out in the Deposit Plan. These included allowing for growth in Monmouth which was previously avoided due to no phosphates solution being identified for the River Wye Catchment area and an increase in the flexibility rate from 10% to 15%. This has resulted in the housing provision figure increasing from 5,940 homes (10% flexibility) to 6,210 homes (15% flexibility). In relation to housing growth in Chepstow it was also agreed to amend the site from Bayfield to Mounton Road on the basis that basis that a mixed-use development that had associated job creation and tourism benefits. See Candidate Sites Assessment Report for further information.
LPA Recommendation	The Bayfield Site has not progressed to the Deposit Plan. In accordance with the October 2023 Council decision, a mixed use residential and employment allocation of approximately 146 homes is to be allocated at Land at Mounton Road, Chepstow. Site specific policy requirements are set out in Policy HA3 – Land at Mounton Road Chepstow.

Commitments	267 homes within Chepstow are included in the proposed commitments benefitting from planning permission as of 1st April 2022. When compared to the other commitments made Chepstow accounts for the second largest contribution of the total 1,261 sites (over 20%) [Taylor Wimpey, Edenstone Homes, Bellway Homes].
LPA Response	Comments noted. This was one of the considerations in relation to allocations and part of the reason why Chepstow has a smaller % of new allocation growth compared to the other Primary Settlements of Abergavenny, Monmouth and Caldicot. See the Housing Background Paper for further explanation.
LPA Recommendation	The Bayfield Site has not progressed to the Deposit Plan. In accordance with the October 2023 Council decision, a mixed use residential and employment allocation of approximately 146 homes is to be allocated at Land at Mounton Road, Chepstow. Site specific policy requirements are set out in Policy HA3 – Land at Mounton Road Chepstow.
Place-making	• Well integrated with the existing community and has strong placemaking credentials to contribute towards the vibrancy of Chepstow. It will deliver: • 50% affordable homes; Net Zero carbon ready homes; Necessary supporting infrastructure; A masterplanning process; A financial viability assessment to ensure site are deliverable within the plan period [BDW]. • Chepstow is within the Gwent Levels Landscape Profiles (GLLP) Gwent Wildlife Trust. We advise the GLLP opportunities for urban areas (p9) should inform allocations in Chepstow. These include: • Embracing the opportunity to design and work with natural resources (nature-based solutions) to provide healthy, resilient and stable new development – sustainable drainage, increasing green infrastructure and open space, carbon sequestration, reduction of air pollution, wildlife friendly gardening and community orchards. • Embracing ecological and design expertise to integrate the various components of urban environments innovatively – sustainable travel (vital for reducing carbon and improving resilience) with G.I, open space, sustainable drainage, habitat retention and enhancement and development and regeneration objectives [NRW]. • Concern that housing developers will not fulfil their promises to green the site by not planting the proposed trees/ maintaining the site [Private Individual x1].
LPA Response	The Bayfield Site has not progressed to the Deposit Plan. In October 2023 a report of post consultation Preferred Strategy changes was agreed by Council. This included swopping the strategic site in Chepstow from Bayfield to Land at Mounton Road on the basis that a mixed-use development had associated job creation and tourism benefits. See Candidate Sites Assessment Report for further information. GI, landscape and Nature Recovery considerations have played an important part in site selection and design with landscape assessments and GI assessments as part of the Candidate Site assessment process. GI assets and opportunities plans are required as part of the ongoing site allocation masterplans. Furthermore, the Deposit Plan includes Policy S5 – Green Infrastructure which requires development proposals to maintain, protect and enhance these resources, as well as other detailed Development Management policies for protecting Monmouthshire's natural environment and the site specific placemaking policy HA3 relating to the Chepstow allocation. Statements of Common Ground will be agreed with developers to ensure these promises to deliver GI and nature recovery requirements are delivered.
LPA Recommendation	The Bayfield Site has not progressed to the Deposit Plan. In accordance with the October 2023 Council decision, a mixed use residential and employment allocation of approximately 146 homes is to be allocated at Land at Mounton Road, Chepstow. Site specific policy requirements are set out in Policy HA3 – Land at Mounton Road Chepstow.

Highway safety /Active Travel	• The site is at a dangerous location for pedestrians and active travel routes are not viable across or along the A466. No safe crossing of the A466 is conveniently available for a trip into town so pedestrians are more likely to take a chance on main road. Given this is a route to school, this must be avoided [Private Individual x1, Cllr Christopher Edwards]. • There isn't a footpath or cycle path that safely connects this area with key amenities and transport [Private Individual x1]. • High speed vehicles along the B4235 Usk Road would significantly reduce safety at the entrance to the site [Private Individual x1], [Cllr Christopher Edwards]. • If Bayfield is developed further there will need to be traffic control measures at the High Beech Roundabout [Private Individual x1]. • Site is too far a walk into Chepstow and is unrealistic to think that people will walk in the town as opposed to using the car, particularly due to hilly topography and polluted main roads [Private Individual x3]. • Only one access road off the development which will further exacerbate the difficulties of the site [Private Individual x1].
LPA Response	The Bayfield Site has not progressed to the Deposit Plan. In October 2023 a report of post consultation Preferred Strategy changes was agreed by Council. This included amending the strategic site in Chepstow from Bayfield to Land at Mounton Road on the basis that a mixed-use development had associated job creation and tourism benefits. See Candidate Sites Assessment Report for further information. The integration of an edge of settlement site with Chepstow's existing settlement is a key principle of the site's development and identifying connection links that provide safe pedestrian crossings and footpaths across the A466 is a key focus of the site. The site will be masterplanned in accordance with Sustainable Transport Policy S13 and Development Management policy ST1. There will also be a site specific placemaking policy HA3 for our Chepstow allocation which will set out expectations for Active Travel and the Transport Assessment for the site. The Infrastructure Delivery Plan sets out further detail on how the required highway infrastructure is to be delivered. It is acknowledged that Chepstow is hilly, however the site search sequence identifies the most sustainable sites in terms of walking distances to key services.
LPA Recommendation	The Bayfield Site has not progressed to the Deposit Plan. In accordance with the October 2023 Council decision, a mixed use residential and employment allocation of approximately 146 homes is to be allocated at Land at Mounton Road, Chepstow. Site specific policy requirements are set out in Policy HA3 – Land at Mounton Road Chepstow.
Public water supply and sewerage network / treatment works	• There are no issues in providing this site with a supply of clean water. There are no issues in the public sewerage network accommodating the foul flows and being accommodated at our Nash Welsh water Treatment Works [Dwr Cymru/Welsh Water]. • Chepstow does not have a wastewater treatment works, but that combined sewer overflows discharge to the River Wye [NRW].
LPA Response	Comments noted. Further detail on water supply /sewerage arrangements for the site will be set out in the Infrastructure Delivery Plan (IDP).
LPA Recommendation	The Bayfield Site has not progressed to the Deposit Plan. In accordance with the October 2023 Council decision, a mixed use residential and employment allocation of approximately 146 homes is to be allocated at Land at Mounton Road, Chepstow. Site specific policy requirements are set out in Policy HA3 – Land at Mounton Road Chepstow.
'Net Zero Carbon Ready Homes'	• Request that further guidance is issued to assist developers in this regard [BDW]. • 'Net Zero Carbon Ready Homes' should be properly defined to reduce uncertainty for developers and to ensure delivery [BDW]. • No reason why home can't be built with top rate insulation to passive house standards [Private Individual x1].

LPA Response	In October 2023 a report of post consultation Preferred Strategy changes was agreed by Council. This included a change to the policy requirement for the environmental credentials of the new homes to be 'net zero carbon' rather than 'net zero carbon ready'. This would result in the new homes achieving a balance between the carbon emitted into the atmosphere, and the carbon removed from it. The objective is to ensure that the new homes constructed within Monmouthshire do not increase carbon emissions in the long term. The Deposit Plan includes policy NZ1 which sets out the definition and standards for 'Net Zero Carbon Homes'
LPA Recommendation	Refer to Policy NZ1 – Monmouthshire Net Zero Carbon Homes for further details.
50% affordable homes	• Challenging due to development viability and delivery concerns and should be thoroughly evaluated. Social Housing Grant is very uncertain at this stage [BDW]. • Positive proposals in the application in particular addressing the need for affordable housing and rentals [Private Individual x1]. • 50% affordable housing will help attract younger families, if only a little, to Chepstow [Private Individual x1]. • Concern affordable housing won't be delivered – Mabey Bridge only 22 houses affordable [Private Individual x1]. • Most houses will not be what I would consider truly affordable [Private Individual x1].
LPA Response	Viability assessments have demonstrated that the proposed site allocations are viable based on the provision of 50% affordable housing. The level of growth proposed in Chepstow is sustainable and proportionate to address local issues and objectives including the delivery of affordable homes and rebalancing our demography.
LPA Recommendation	The Bayfield Site has not progressed to the Deposit Plan. In accordance with the October 2023 Council decision, a mixed use residential and employment allocation of approximately 146 homes is to be allocated at Land at Mounton Road, Chepstow. Site specific policy requirements are set out in Policy HA3 – Land at Mounton Road Chepstow.
Infrastructure (Services)	• Development of any site in Chepstow would cause detriment to town without significant investment in supporting infrastructure [Cllr Christopher Edwards, [Private Individual x7] • Examples of families who have moved to Chepstow who cannot find a dentist [Private Individual x2]. • The existing community are under-served for primary health care – only 3 GP Surgeries and one community hospital. A further increase in population will make this worse/put a strain on these services [Taylor Wimpey, Edenstone Homes, Private Individual x4]. • Chepstow has lack of funding for improvement to Schools/leisure/community facilities/ wellbeing & cultural activities [Private Individual x5]. • Chepstow is behind other Monmouthshire town in terms of funding and amenities. Chepstow school's redevelopment is low on the list why is it high on the list for more housing? [Private Individual x1]. • Public transport services in Chepstow are not fit for purpose. Lack frequency to key commuter destinations [Private Individual x1]. • Requires a realistic public transport action plan [Private Individual x1]. • If Bayfield is built Chepstow will require at least one more primary school [Private Individual x1].
LPA Response	The Bayfield Site has not progressed to the Deposit Plan. In October 2023 a report of post consultation Preferred Strategy changes was agreed by Council. This included swopping the strategic site in Chepstow from Bayfield to Land at Mounton Road on the basis that a mixed-use development that includes a care home and proposed hotel had associated job creation and tourism benefits. See Candidate Sites Assessment Report for further information.

	An Infrastructure Delivery Plan (IDP) has been prepared to assess the key issues and constraints and what the infrastructure requirements for each of the residential allocations within the RLDP. Site placemaking masterplanning policies have also been set out within the Plan to set out clearly the key placemaking requirements for each site. See Policies S8 and HA3 for Land at Mounton Road Chepstow.
LPA Recommendation	The Bayfield Site has not progressed to the Deposit Plan. In accordance with the October 2023 Council decision, a mixed use residential and employment allocation of approximately 146 homes is to be allocated at Land at Mounton Road, Chepstow. Site specific policy requirements are set out in Policy HA3 – Land at Mounton Road Chepstow. Refer to the Infrastructure Delivery Plan –for further details on the infrastructure requirements as a result of the proposed allocation at Land at Mounton Road. Policies S8 and HA3 also sets out key master planning parameters.
Infrastructure (Highways)	• Transport Infrastructure improvements required before housing is built [Cllr Christopher Edwards, Private Individual x9]. • Current transport infrastructure cannot cope with current demands and there is significant traffic in Chepstow [Cllr Christopher Edwards, Private Individual x12]. • Highbeech roundabout already under severe congestion and pressure with traffic [Private Individual x4]. • Congestion at M48 Severn Bridge and Newhouse Roundabout [Private Individual x1]. • Road conditions are appalling. We cannot look after the roads we have now [Private Individual x1]. • One accident or roadworks and the whole town goes into gridlock [Private Individual x1]. • Large number of new residents are using Chepstow as a dormitory town. Traffic has built up at busy times and can take an hour to get from Bayfield site to M48 [Private Individual x1]. • There does not appear to be any hope for a Chepstow bypass [Private Individual x1]. • A bypass for traffic between Beechly and the M48 is needed urgently to address the well documented traffic and pollution problem [Private Individual x4]. • Increase of traffic also from the Forest of Dean [Private Individual x1.] • Chepstow has not yet felt the full impact of Fairfield Mabey development as it is not yet completed and hence traffic county understated [Private Individual x1]. • Decision to include Bayfield must take into account the demonstrated Chepstow WelTAG Stage 1) inability of existing road infrastructure to cope with traffic growth [Private Individual x2].
LPA Response	The Bayfield Site has not progressed to the Deposit Plan. In October 2023 a report of post consultation Preferred Strategy changes was agreed by Council. This included swopping the strategic site in Chepstow from Bayfield to Land at Mounton Road on the basis that a mixed-use development had associated job creation and tourism benefits. See Candidate Site Assessment for further information. A Strategic Transport Assessment (STA) has been undertaken by TfW in order to understand the cumulative impact the proposed housing growth will have on Monmouthshire's transport network. The STA concludes a slight increase in traffic flows with the proposed Chepstow/ Severnside developments. Transport Assessments will be required to identify localised issues, set out specific mitigation and highway improvements to ensure traffic safety and capacity on the roads and that proposed development accords with the 'Sustainable Transport Hierarchy'. This is also set out in Policies S13 and ST1 'Sustainable Transport Proposals ' and Place-making Policies S8 and HA3.
LPA Recommendation	Refer to the Infrastructure Delivery Plan –for further details on the Infrastructure requirements as a result of the proposed allocation at Land at Mounton Road. Policies S8 and HA3 also sets out key master planning parameters.

Cumulative impact	• Strategic allocations focus 1,070 homes within the south eastern corner of the county where both Chepstow and Caldicot are location less than 7km apart. Significant concerns remain for the current infrastructure of the town and the cumulative pressure each of these development proposals will place on the current services and facilities [Hallam Land Management Ltd, Taylor Wimpey, Edenstone Homes, Bellway Homes, Private Individual x1].
LPA Response	An Infrastructure Delivery Plan (IDP) has been prepared to assess the key issues and constraints and what the infrastructure requirements for each of the residential allocations within the RLDP. The cumulative impacts of site allocations are considered as part of the Integrated Sustainability Assessment (ISA) and the Habitats Regulations Assessment (HRA).
LPA Recommendation	Refer to the Infrastructure Delivery Plan –for further details on the Infrastructure requirements as a result of the proposed allocations in the south of the county. See also the IDP and HRA which looks at the cumulative impact of the proposed development
Air Quality/ Pollution	• With the additional traffic comes increased vehicle emissions and pollution [Hallam Land Management Ltd, Cllr Christopher Edwards, Private Individual x10]. • There is a localised problem of air pollution within Chepstow and the associated Air Quality Management Area (AQMA) implemented due to health impacts caused by the vehicle emissions from congestion along the A48. The cumulative impact of any development on the A466, A48 and Highbeech roundabout must be appropriately assessed and carefully considered to ensure potential air pollution impacts are limited [Hallam Land Management Ltd, Taylor Wimpey, Edenstone Homes, Bellway Homes]. • No solution or even progress towards a solution is being advanced by either the Welsh Government or the Council [Cllr Christopher Edwards, Private Individual x2].
LPA Response	Although it is acknowledged there is a localised problem within Chepstow with regard to air pollution and there is an existing AQMA within Chepstow, latest evidence is indicating that air quality is improving within the area. The latest Air Quality Management Progress Report 2023 on the Council's website indicates that there have been improvements to air quality in the area since 2017. The Council also has an Air Quality Action Plan which is continuously reviewed. Additional impact, including cumulative of proposed development will be appropriately assessed with localised air quality assessments and reviewed by MCC Environmental Health Officers. The impact of development upon air quality is also set out placemaking Policies S8 and site specific HA3 – Land at Mounton Road Chepstow. The cumulative impacts of site allocations upon air quality are also considered as part of the Integrated Sustainability Assessment (ISA) and the Habitats Regulations Assessment (HRA).
LPA Recommendation	Refer to ISA and HRA and Policies S8 and HA3. Continue to liaise with MCC Environmental Health Officers.
Green Belt	• Surprising that a strategic site is identified at Chepstow ahead of the Green Belt review. This large constraint has been dismissed and not appropriately considered [Melin Homes, Persimmon Homes East Wales, Llanarth Estates, Tirion Homes, Candleston Homes, Sero Homes, Private Individual x2]. • Chepstow's constraints were reflected upon the by Inspector examining the existing LDP where a Green Belt was initially proposed and subsequently deleted. The Inspector identified that land to the west of Chepstow presents the 'least harmful location' for future development [Barwood].
LPA Response	The South East Wales Regional Strategic Diagram (page 163 of Future Wales) provides an indicative plan of the area for consideration with the detailed boundary to be defined through the preparation of the SDP. While the County's main towns are situated outside of Future Wales' indicative green belt, in assessing candidate sites and their relationship to Policy 34 of Future Wales, consideration has been given to PPW12 which states that when

	considering a Green Belt designation, a sufficient range of development land which is suitably located in relation to the existing urban edge should be made available, having regard to the longer term need for development land, the effects of development pressures in areas beyond the Green Belt and the need to minimise demand for travel. This may require land to be safeguarded, and boundaries of proposed Green Belts must be carefully defined to achieve this. Potential Green Belt land is to be assessed and designated as part of a Strategic Development Plan (SDP) for the South East Wales Region.
LPA Recommendation	A strategic site is to be identified in Chepstow. In accordance with the October 2023 Council decision, a mixed use residential and employment allocation of approximately 146 homes is to be allocated at Land at Mounton Road, Chepstow. Site specific policy requirements are set out in Policy HA3 – Land at Mounton Road Chepstow.
Agricultural land	• The erosion of agricultural land is only a problem because of the Council's preference to drive high growth. National Policy responds to Monmouthshire's landscape by directing growth elsewhere [Cllr Christopher Edwards, Private Individual x3]. • There is a need to protect Monmouthshire's Best and Most Versatile land as set out in National Planning Policy. MCC is promoting ambitious high growth agenda heavily dependent on job creation both are which beyond the Welsh Government's growth projections. The land north of Bayfield is grade 2 BMV land and in considering what weight to give the BMV constraint MCC is under duty to address the difference between these projections [Private Individual x1].
LPA Response	Welsh Government formally responded to the 2022 Preferred Strategy consultation in January 2023 with a 'green' rating and noting that "Future Wales places great emphasis on the development of National Growth Areas and the need for additional affordable housing. The Preferred Strategy is in general conformity with Policies 1, 7 and 33 of Future Wales and does not undermine the role of Cardiff, Newport and the Valleys as the main focus for growth and investment in the south east region, but reflects the urgent need to increase the supply of affordable housing in Monmouthshire." In this respect, the level of growth proposed has been deemed in conformity with Future Wales by Welsh Government. Brownfield opportunities have been considered through the site selection and candidate site process however, given the limited brownfield opportunities in a Monmouthshire context, greenfield opportunities, including BMV land, have had to be considered to meet the housing and employment requirements. The widespread distribution of BMV agricultural land throughout Monmouthshire means that it does not affect the spatial strategy: all four of our primary settlements including Chepstow, are surrounded by BMV agricultural land, so it is not possible to avoid the development of such land via a different spatial strategy. The site allocation process has gone through a 'Site Search Sequence' which has sequentially assessed sites in relation to the proportion of BMV land.
LPA Recommendation	No changes to the level of growth and spatial strategy area required (a housing providing figure of 6,210 homes was agreed in the October 2023 Council decision).
Landscape /AONB	• Within close proximity to Wye Valley National Landscape (AONB). A Landscape Sensitivity Assessment (LSA) would help inform your Authority's decision on whether to progress this site. If progressed please consider informing the decision with Landscape Visual Impact Assessments (LVIAs) [NRW]. • Site has the potential to significantly impact the surrounding landscape and heritage where part of the site falls within the Wye Valley National Landscape (AONB) [Hallam Land Management Ltd, [Taylor Wimpey, Edenstone Homes, [Bellway Homes, [Cllr Christopher Edwards, Private Individual x10].

	• Current planning application has significant landscape objections. Whilst proposed allocation is for a smaller scale of development it has not been demonstrated how a reduction in scale will avoid these impacts given its location. The Council should seek to first avoid harm to the special AONB landscape, and the allocation would conflict with Strategic policies S3 and S7 [Vistry]. • Houses on the hillside will break the skyline and negatively impact on important view from the AONB, Lion Gates and other valuable locations from the enjoyment of the AONB, thus eroding the high value natural landscape the RLDP claims wants to protect [Cllr Christopher Edwards, Private Individual x1]. • The reappraisal of the LSA was done by the developer promoting the site to serve its own ends [Cllr Christopher Edwards, Private Individual x1]. • The High-Level Assessment of Candidate Sites asks whether a site is subject to fundamental constraints and cannot be mitigated. No such assessment has been undertaken in relation to the proposed allocation with the box in the matrix left blank with no affirmative or negative and no reference to the fact that the site shares a boundary with the AONB [Vistry]. • The Integrated Sustainability Appraisal (ISA) assessment of growth areas is categorised as uncertain, whilst other locations are categorised as having a significant negative effect. The respondent considers there to be a high degree of certainty that development directly adjacent to the AONB will have a significant effect on landscape and this is supported by the Council's landscape officers in assessment of the current planning application [Vistry]. • Mounton Road (Option E) performs better in the ISA in landscape terms, as endorsed by the previous LDP Inspector's comments confirming that out client's site is that least harmful location for future growth of the town [Barwood]. • Growth in this area would have a detrimental impact on the outstanding views into and out of the AONB. A large development of houses at this location will destroy the beautiful sweep of fields leading up to the wooded boundary of the AONB [Private Individual x1]. • More development close to the AONB boundary will have a detrimental impact on dark night skies within the AONB [Private Individual x1]. • More than ever people are recognising the importance of the distinctive character of these diminishing landscapes and action must be taken to ensure the preservation for generations to come [Private Individual x1].
LPA Response	The Bayfield Site has not progressed to the Deposit Plan. In October 2023 a report of post consultation Preferred Strategy changes was agreed by Council. This included swopping the strategic site in Chepstow from Bayfield to Land at Mounton Road on the basis that a mixed-use had associated job creation and tourism benefits. See Candidate Sites Assessment Report for further information. All site proposals will be required to accord with landscape Policies within the RLDP, LC1-LC5 to ensure development would not have an unacceptable adverse effect on the special quality of Monmouthshire's landscape.
LPA Recommendation	The Bayfield Site has not progressed to the Deposit Plan. In accordance with the October 2023 Council decision, a mixed use residential and employment allocation of approximately 146 homes is to be allocated at Land at Mounton Road, Chepstow. Site specific policy requirements are set out in Policy HA3 – Land at Mounton Road Chepstow. All site proposals will be required to accord with landscape Policies within the RLDP, LC1-LC5 to ensure development would not have an unacceptable adverse effect on the special quality of Monmouthshire's landscape
Heritage	• Adjacent to the site is the Bishop Barnet's Wood Camp Scheduled Ancient Monument (SAM) which is of national importance and likely to be of later prehistoric period and noted as being important element within the surrounding landscape [Hallam Land Management Ltd, Taylor Wimpey, Edenstone Homes, Bellway Homes].
LPA Response	The Bayfield Site has not progressed to the Deposit Plan. In October 2023 a report of post consultation Preferred Strategy changes was agreed by Council. This included swopping the strategic site in Chepstow from Bayfield to Land at Mounton Road on the basis that a mixed-use development had associated job creation and tourism benefits. See Candidate Sites Assessment Report for further information.

LPA Recommendation	The Bayfield Site has not progressed to the Deposit Plan. In accordance with the October 2023 Council decision, a mixed use residential and employment allocation of approximately 146 homes is to be allocated at Land at Mounton Road, Chepstow.
Ecology	• Development on greenfield sites will damage the habitat of birds, bats, badgers, butterflies [Private Individual x5]. • Dormice are present in the west of this site. The Chepstow area is important for horseshoe bats and constituent part of the Forest of Dean bat sites SAC are located just north of the town. Development proposals for land surrounding Chepstow will need to have regard to the SAC conservation objectives [NRW]. • A significant buffer of at least 15m to the adjacent woodland will be needed and a sensitive lighting scheme necessary [NRW].
LPA Response	The Bayfield Site has not progressed to the Deposit Plan. In October 2023 a report of post consultation Preferred Strategy changes was agreed by Council. This included swopping the strategic site in Chepstow from Bayfield to Land at Mounton Road on the basis that a mixed-use development had associated job creation and tourism benefits. See and Candidate Sites Assessment Report for further information. All site proposals will be required to meet GI, landscape and Nature Recovery considerations. National Policy PPW chapter 6 as well as our Policies within the RLDP, S5, GI1, LC1-LC5, NR1-NR3 ensure all biodiversity is maintained and enhanced and ecosystem resilience will be improved as a result of proposed development.
LPA Recommendation	The Bayfield Site has not progressed to the Deposit Plan. In accordance with the October 2023 Council decision, a mixed use residential and employment allocation of approximately 146 homes is to be allocated at Land at Mounton Road, Chepstow. Site specific policy requirements are set out in Policy HA3 – Land at Mounton Road Chepstow. All site proposals will be required to meet GI, landscape and Nature Recovery considerations. National Policy PPW chapter 6 as well as our Policies within the RLDP, S5, GI1, LC1-LC5, NR1-NR3 ensure all biodiversity is maintained and enhanced and ecosystem resilience will be improved as a result of proposed development.
Self – containment /commuting	• Chepstow has a poor level of self- containment [Melin Homes, [Llanarth Estates, [Tirion Homes, Candleston Homes, Sero Homes, Sero, Private Individual x1]. • High percentage of population that commute outside of Chepstow for work. By focusing strategic growth within Chepstow, the development could encourage commuters and therefore promote business growth and employment outside the County. The high commuter population is also linked to the ongoing issues of congestion, which the proposed strategic development would arguable exacerbate [Hallam Land Management Ltd, [Taylor Wimpey, Bellway Homes]. • Where are the local jobs? Commuting to work is the only way for working-aged people to earn a living in Chepstow [Private Individual x1].
LPA Response	The Bayfield Site has not progressed to the Deposit Plan. In October 2023 a report of post consultation Preferred Strategy changes was agreed by Council. This included swopping the strategic site in Chepstow from Bayfield to Land at Mounton Road on the basis that a mixed-use development had associated job creation and tourism benefits. Supporting a mixed use site in Chepstow could reduce the need to travel to work as gives the opportunity to work and live together and gives the opportunity to increase the level of self containment within Chepstow. Proposed development will be required to accord with the Sustainable Transport Hierarchy as set out in National Policy and the RLDP Policy S13 and ST1 which requires new development to reduce the need to travel and promote active travel and public transport connections above the private car.
LPA Recommendation	In accordance with the October 2023 Council decision, a mixed use residential and employment allocation with opportunities for self containment and reduced commuting is to be allocated at Land at Mounton Road, Chepstow.

Forest of Dean (FOD) /South Gloucester	• 2,460 homes in the neighbouring town of Lydney are currently proposed. A48 road that passes through Chepstow is the main link between the FOD and motorway network, which will put added strain on the highway capacity of Chepstow and Air Quality Management Area (AQMA) [Taylor Wimpey, Edenstone Homes, Bellway Homes, Private Individual x3]. • Over 5000 new houses have already been approved to built in nearby towns and villages e.g. Lydney, Sedbury, Beachley, Tutshill [Private Individual x1]. • Demand from nearby settlements in England ignored in the Council's assessment of the capacity for Chepstow to grow [Private Individual x1].
LPA Response	Comments noted, the Council are working collaboratively with the Forest of Dean and South Gloucestershire on issues affecting Chepstow in relation to the A48. A Strategic Transport Assessment (STA) has been undertaken by TfW in order to understand the cumulative impact the propose housing growth will have on Monmouthshire's transport network. The STA concludes a slight increase in traffic flows with the proposed Chepstow/ Severnside developments. Transport Assessments will be required to identify localised issues, set out specific mitigation and highway improvements to ensure traffic safety and capacity on the roads and that proposed development accords with the 'Sustainable Transport Hierarchy'. This is also set out in Policies S13 and ST1 'Sustainable Transport Proposals' and Place-making Policies S8 and HA3. An infrastructure Delivery Plan (IDP) has also been prepared which sets out the highway infrastructure requirements for the proposed site in Chepstow.
LPA Recommendation	Continue to liaise with Forest of Dean Council, South Gloucestershire Council and other neighbouring authorities in England on issues that affect the Chepstow area in particular.
Public consultation	• Site selected without any formal public consultation. At the time of the production of the Preferred Strategy no assessment and no consultation has been done of the site. The site selection pre-determines the outcome of the consultation which is contrary to the required process [Cllr Christopher Edwards, Private Individual x1].
LPA Response	Prior to formal public consultation of the Preferred Strategy 2022 several public consultation events had taken place in relation the RLDP 2018-2033. This included non statutory growth and spatial options public consultation 8th July 2019- 5th August 2019 and 4th January 2021- 1ST February 2021. Statutory public consultation for the Preferred Strategy 2021 (which included an event in Chepstow Drill Hall) and the current Preferred Strategy 2022 December 2022- January 2023 (in person event in Chepstow Board School). The feedback from the growth and spatial options consultations helped to form the decisions and strategic site selection for the 2022 Preferred Strategy Consultation. As such, as a result of the feedback from the Preferred Strategy 2022 consultation, the Bayfield Site has not progressed to the Deposit Plan. In October 2023 a report of post consultation Preferred Strategy changes was agreed by Council. This included swopping the strategic site in Chepstow from Bayfield to Land at Mounton Road on the basis that a mixed-use had associated job creation and tourism benefits. For further information on the Plan's consultation process see our Delivery Agreement and in particular section 3 Community Involvement Scheme which sets out how the Council has proactively involved the community and stakeholders in the preparation on the RLDP.
LPA Recommendation	Continue to carry out necessary public consultations as set out in the Delivery Agreement and Community Involvement Scheme.
Mounton Road (CS0165)	• The Integrated Sustainability Appraisal (ISA) assesses the three proposed areas for development in Chepstow. Option E (CS0165) was demonstrated as the most sustainable choice primarily for its closer proximity to the town centre creating a more connected and inclusive space [Cllr Christopher Edwards, Private Individual x1]. • CS0165 does not impact on the Wye Valley National Landscape (AONB) in the way that CS0098 does [Cllr Christopher Edwards, Private Individual x1].

	• Mounton Road is the optimum location for growth in Chepstow on the basis that it would accommodate a mix of uses (residential/hotel/commercial), is sensitively and discretely located in response of the AONB, and is well located in relation to the town centre and train station (including the various improvements to the town's public transport services emerging through the Council's Masterplan). It is unclear why Bayfield has been chosen [Barwood (1989)]. • Quicker pedestrian and cycle routes to the town centre in comparison with Bayfield. It takes 6-8 less minutes in walking time to the transport hubs in Chepstow [Barwood]. • Based on the ISA Option E is the most suitable, viable and sustainable location for the town's strategic allocation [Barwood].
LPA Response	The Bayfield Site has not progressed to the Deposit Plan. In October 2023 a report of post consultation Preferred Strategy changes was agreed by Council. This included swopping the strategic site in Chepstow from Bayfield to Land at Mounton Road on the basis that a mixed-use development had associated job creation and tourism benefits. See Candidate Site Assessment Report for further information.
LPA Recommendation	The Bayfield Site has not progressed to the Deposit Plan. In accordance with the October 2023 Council decision, a mixed use residential and employment allocation of approximately 146 homes is to be allocated at Land at Mounton Road, Chepstow. Site specific policy requirements are set out in Policy HA3 – Land at Mounton Road Chepstow.
Planning History	• Given the history of site CS0098 with previous refusals for development on account of the detriment caused to the Wye Valley National Landscape (AONB) there is no objective justification. It must therefore be assumed that either political preferences or developer lobbying is behind the proposal. Either of which is unacceptable and undermines the confidence of the public in the planning system [Cllr Christopher Edwards, Private Individual x1]. • Objections (over 800) to the current DM/2019/00013 planning application must be taken into account as an indication of the sentiment for development on this site [Cllr Christopher Edwards, Private Individual x2]. • It's been accepted by a Planning Inspector in a previous appeal decision on the site that the potential for development to impact on the setting of the AONB is a material consideration [APP/P1235/A06/2012807,2007] [Private Individual x2].
LPA Response	The Bayfield Site has not progressed to the Deposit Plan. In October 2023 a report of post consultation Preferred Strategy changes was agreed by Council. This included swopping the strategic site in Chepstow from Bayfield to Land at Mounton Road on the basis that a mixed-use proposal had associated job creation and tourism benefits. See Candidate Sites Assessment Report for further information.
LPA Recommendation	The Bayfield Site has not progressed to the Deposit Plan. In accordance with the October 2023 Council decision, a mixed use residential and employment allocation of approximately 146 homes is to be allocated at Land at Mounton Road, Chepstow. Site specific policy requirements are set out in Policy HA3 – Land at Mounton Road Chepstow.
Insufficient Information	• Insufficient detail about planned improvements for Chepstow's infrastructure to be able to have confidence on the decisions of the Preferred Strategy [Private Individual x1]. • Expected more information showing results of transport assessment with due diligence to active travel and air quality [Private Individual x1].
LPA Response	The Infrastructure Delivery Plan (IDP) will set out the level of Infrastructure required for the proposed allocation in Chepstow and how this will be delivered. Policies S8 and HA3 – Land at Mounton Road – also sets out key master planning parameters for the proposed site allocation in Chestow. Prior to progressing with a planning application a Transport Assessment and air quality assessment will be required.

LPA Recommendation	Refer to the Infrastructure Delivery Plan –for further details on the Infrastructure requirements as a result of the proposed allocation at Land at Mounton Road. Policies S8 and HA3 also sets out key master planning parameters.
General/ Other	• Flooding impact [Private Individual x1]. • Why does the town of Usk never appear in your development plans? Spreading new housing across the County will reduce the impact on the major towns and have a positive impact on Usk itself [Private Individual x1]. • An incentive for minimal suitable located Chepstow housing for Chepstow job holders really ought to be the priority. The obvious implications being reduced commuting distances and fewer subsided council tax payment [Private Individual x1].
LPA Response	High level Candidate Site Assessment sifted out sites on flood plains. Furthermore National Flooding policies (TAN15) and policies within the RLDP will ensure there is no flood risk to development. Usk has a proposed housing allocation. See site allocation Policy HA11 of the Deposit RLDP. Affordable housing in Monmouthshire will only be allocated to people with a local connection to Monmouthshire. It should be noted that this is a policy approach outside of the remit of the RLDP which sits with Monmouthshire County Council's Housing team. It is beyond scope of RLDP to control market homes occupation, however the Plan does contain Policy H8 – Housing Mix to ensure that development proposals contain a range and mix of house types, tenure and size.
LPA Recommendation	

Question 12 – Do you have any comments on Strategic Policy S7 Preferred Strategic Site Allocations: c) Caldicot East?

45 organisations or members of the public submitted a response to question 12.

The comments raised concern over delivery of the site within the Plan period suggesting the quantum of development was too large to be delivered in the timeframe. There were concerns over the infrastructure necessary to bring the site forward and impact on the existing highway network. Concerns from residents in the area related to wider impact on existing facilities and services, noting these are already stretched. There were also concerns raised on how the site would change the nature and character of the area particularly the villages of Portskewett and Crick. Statutory consultees did not raise concern over the level of development but suggested additional assessments and modelling would be necessary prior to allocation in the Deposit RLDP.

Key Theme	Summary of Points Raised
Support policy/site	• Strongly support the allocation of Caldicot East and the contribution it can make to the RLDP. Provided detailed representations in support of the site as one of the site promoters. Note development will be brought forward on a phased basis and provides an opportunity to progress multiple outlets due to its size which will result in an increased rate of delivery per annum [Richborough Estates].
LPA Response	Support noted.
LPA Recommendation	No change required.
Object to policy/site	• Do not support site due to significant concerns regarding sustainability, access and infrastructure, with a key concern of concentrated delivery of development [Hallam Land Management Ltd., Taylor Wimpey, Edenstone Homes & Bellway Homes].

	• State site is too large and will fundamentally change the nature and character of the villages of Portskewett and Crick, bringing both into Caldicot [Private individuals x 3]. • A number of private individuals object to the site due to one or more of the following reasons; impact on village of Portskewett, risk of flooding in wider Caldicot area due to surface water run-off, ecological impact, no NHS dentist, lack of school spaces, difficulty getting doctors appointments, pharmacy queues, lack of shops in centre, antisocial behaviour, lack of employment opportunities, lack of public transport and increase in traffic on roads. [Private individuals x 21]. • Object to site as it goes against placemaking themes in Planning Policy Wales relating to Strategic and Spatial Choices, Active and Social Places, Productive and Enterprising Places and Distinctive and Natural Places [Private individuals x 2]. • Proposed development would substantially alter the demographic of the area leading to a big difference in local needs which would need to be properly assessed [Private individual x 1]. • Concern on impact of SSSI, wildlife and habitats. Suggest development should only be focused on the Showground part of the site [Private individual x 1].
LPA Response	Comments noted. At the time of the Preferred Strategy consultation Land to the east of Caldicot site (previously known as Caldicot East) was proposed for 925 homes within the plan period. This has been reduced in the Deposit Plan to approximately 770 homes. Land to the east of Caldicot provides the opportunity for a new neighbourhood of Caldicot with links to Portskewett to the east. The site is allocated as a residential-led mixed-use development delivering net zero carbon homes, of which 50% will be affordable, along with a primary school, a local centre, public open space, community facilities and B1 employment uses. The primary school will bring benefits for the wider community serving both the new development and nearby homes in both Caldicot and Portskewett. Infrastructure requirements are set out within the site allocation policy. An Infrastructure Delivery Plan has also been prepared which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of the allocated sites. Site specific considerations are included as an appendix to the Deposit Plan. The consideration of any designations (including ecological and heritage designations) and other constraints have been considered through the masterplanning process to date and referred to in the site allocation policy wording and supporting text.
LPA Recommendation	No change required.
Number of dwellings proposed/ deliverability	• No certainty the site will be able to deliver the quantum of homes over the plan period as neither site has developer interest [Barratt & David Wilson Homes]. • Suggest to meet the tests of soundness the quantum of development allocated through this policy should be reduced and additional sites allocated for development to ensure consistent delivery of homes throughout the County [Hallam Land Management Ltd., Taylor Wimpey, Edenstone Homes & Bellway Homes]. • Consider the Preferred Strategy is overly reliant on this strategic site presenting significant risk to the delivery of housing over the plan period [Vistry]. • Given the site represents such a significant allocation for the County state it is important that it is found to be the most appropriate site and that deliverability is certain. Note it is challenging to ascertain at this stage as only a high-level candidate site assessment together with a comparative analysis of options included in the Integrated Sustainability Appraisal. Full response provides a detailed comparison between their own site and the Caldicot East site [Redrow Homes].

	• Refer to research undertaken by Lichfields 'Start to Finish' (2nd Edition, Feb 2020). States if it is assumed a build out rate of 107 homes per annum from first completion and an allowance of time to secure necessary permissions, consents and infrastructure delivery, the sites contribution to housing supply within the plan period will fall significantly below the 925 homes assumed in the Preferred Strategy [Edenstone Group & Edenstone].
LPA Response	Comments noted. At the time of the Preferred Strategy consultation the Land to the east of Caldicot site was proposed for 925 homes within the plan period. This has been reduced in the Deposit Plan to approximately 770 homes. Anticipated delivery rates have been set out in the Housing Trajectory contained in Appendix 9 of the Deposit Plan. This demonstrates that the site can be delivered within the Plan period.
LPA Recommendation	No change required.
Strategic Infrastructure	• Likely a Hydraulic Modelling Assessment (HMA) of both water supply and public sewerage networks will be required to determine the level of reinforcement works required to accommodate the proposed development. Also note a 2" distribution water main (including an abandoned stretch) traverse the site for which protection measures will be required in the form of an easement width or diversion [Dwr Cymru/Welsh Water]. • Significant infrastructure costs associated with bringing this site forward which could impact on delivery rates and timescales [Barratt & David Wilson Homes]. • No problem with the housing as it is much needed but concerned about supporting infrastructure, lack of public transport and traffic impact, particularly on Magor, Caldicot and Chepstow [Private individuals x 3].
LPA Response	Comments noted. Infrastructure requirements are set out within the site allocation policy. An Infrastructure Delivery Plan has also been prepared which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of the allocated sites. Site specific considerations are included as an appendix to the Deposit Plan.
LPA Recommendation	No change required.
Green Belt	• Surprised a significant site is identified at Caldicot ahead of the Green Belt review [Melin Homes, Llanarth Estates, Tirion Homes, Candleston Homes, Sero Homes, Sero & Private individuals x 2].
LPA Response	The boundary of the Green Belt will be informed by the SDP. The indicative Green Belt (as set out in Future Wales), is located to the north of the M48 which is outside the boundary of Land to the east of Caldicot.
LPA Recommendation	No change required.
Proximity to M4	• Suggest it seems illogical to locate a housing estate close to the M4 junction if it is the intention of Welsh Government to alleviate the growth of traffic along the M4 in Wales particularly as Caldicot has one of the poorest levels of self-containment within the County, with just 20% of residents working locally. Concern it will attract commuters from the South West at the expense of local residents who will continue to be priced out of the area [Melin Homes, Llanarth Estates, Tirion Homes, Candleston Homes, Sero Homes, Sero & Private individuals x 2].
LPA Response	Comments noted. Land to the east of Caldicot provides the opportunity for a new neighbourhood of Caldicot with links to Portskewett to the east. The site is allocated as a residential-led mixed-use development delivering net zero carbon homes, of which 50% will be affordable, along with a primary school, a local centre, public open space, community facilities and B1 employment uses. The primary school will bring benefits for the wider community

	serving both the new development and nearby homes in both Caldicot and Portskewett. While there is no control over where the purchasers of market homes currently live, the affordable housing on the site will only be allocated to people with a local connection to Monmouthshire (note that this is a policy approach outside of the remit of the RLDP which sits with the Monmouthshire Housing team). A housing mix policy is also included in the plan to encourage a better mix of house types, tenure and size to help address demographic and affordability challenges facing the County. This policy applies to all residential sites including the allocated housing sites.
LPA Recommendation	No change required.
20-minute neighbourhood	• Suggest majority of site is located outside the 20-minute neighbourhood [Hallam Land Management Ltd., Taylor Wimpey, Edenstone Homes & Bellway Homes].
LPA Response	Comments noted. It is recognised that the northernmost part of the site will be located further than a 20-minute walking distance to Caldicot Town Centre and other community facilities including the Secondary School. The site will, however, provide a number of facilities on-site including a primary school, local centre, public open space, appropriate community facilities and B1 employment. The policy also includes reference to the provision of a public transport link throughout the site to enable connections to Caldicot Town Centre and beyond.
LPA Recommendation	No change required.
Masterplanning/ Assessments	• Provide detail on proximity to designations that need to be considered as part of the development. Recommendation that opportunities in relation to design, ecology, drainage and natural resources are also provided to inform masterplanning of the site [Natural Resources Wales].
LPA Response	Comment noted. The site allocation policy wording and supporting text provide reference to nature conservation designations including the Nedern Brook wetlands SSSI and Severn Estuary European Marine Site. The policy wording ensures any impact is recognised and that careful design is required to avoid increased disturbance to qualifying features. Masterplanning has considered these designations to date and will continue to as it evolves further through to the planning application stage. An Infrastructure Delivery Plan has been produced with site specific considerations relating to Land east of Caldicot which is an appendix to the Deposit Plan.
LPA Recommendation	No change required.
Other	• Development Plan Manual requires the site to be identified within a published disposal strategy indicating a clear commitment to bringing the site forward at a point in time during the Plan period as it is partly within Council ownership [Redrow Homes].
LPA Response	Comment noted. Assets proposed for disposal are not publicly listed and require Council consent prior to disposal, at which time assets are advertised on the open market. The Council has given support for this site to progress as an allocation through endorsement of the Preferred Strategy, as such this shows commitment for the site to be disposed of and brought forward within the plan period. Refer to the housing trajectory which sets out anticipated timescales for the development of the site.
LPA Recommendation	No change required.

Question 13 – Do you have any comments on Strategic Policy S8 Gypsy and Travellers?

6 organisations or members of the public submitted a response to question 13.
Welsh Government highlighted the need to ensure an agreed GTAA is place before the Deposit and failure to meet the identified need in the Plan could result in the plan being found unsound. It was noted that the sites should incorporate usual GI, highways, and planning considerations, with some noting the plan should not allocate site(s).

Key Theme	Summary of Points Raised
G&T need should be addressed in the RLDP.	• A GTAA should be agreed by Welsh Ministers by Deposit stage and cover the full plan period 2018 to 2033. Provision must be made in the Deposit plan for appropriate and deliverable site allocations to meet the identified need in the timescales set out. Failure to agree the GTAA and meet the identified need, specifically in the short to medium term, could result in the plan being considered 'unsound'. Therefore, encourage MCC to work with WG's Communities Division to ensure an agreed GTAA is in place by Plan Deposit. [WG] • Needs of Gypsy and Traveller community should be catered for in the Plan. [Private Individual]
LPA Response	An updated GTAA has been prepared and was agreed by Welsh Government in June 2024. A site allocation to address outstanding Gypsy and Traveller need to 2033 is made under Policy S9 – Gypsy and Travellers (formally S8 in the Preferred Strategy).
LPA Recommendation	Update Strategic Policy S8 (now S9 in the Deposit Plan) to include a site-specific allocation to meet the outstanding GTAA need.
Sites should consider planning considerations	• Land should not be made available without the usual GI, public open space and amenity land protections, highway, and planning considerations. [Cllr Louise Brown]
LPA Response	Comments noted. In addition to Planning Policy Wales, the RLDP Gypsy and Traveller Allocation and any proposals that come forward during the Plan period will also be considered against Welsh Government Guidance: Designing Gypsy, Traveller and Travelling Showpeople Sites.
LPA Recommendation	No change required.
Object to G&T provision	• Object to policy and allocating Gypsy and Traveller site(s). [Private Individuals x 3]
LPA Response	Planning Policy Wales requires Local Authorities to allocate sites to meet the need identified in the Gypsy Travellers Accommodation Assessment and provide a criteria-based policy for sites that may come forward throughout the life of the Plan.
LPA Recommendation	No change required.

Question 14 – Do you have any comments on Strategic Policy S9 Sustainable Transport?

50 organisations or members of the public submitted a response to Question 14 – Sustainable Transport.
Comments generally supported the concept and objectives of sustainable transport and active travel provision, such as improved cycleways, walkway and siting development along public transport routes as well as acknowledging the propensity in home working reducing the need to travel in the first place. Comments also recognised however that within a rural county, such as Monmouthshire, it is often difficult and unpractical to implement alternatives to the car and there is still a heavy reliance on the car and road infrastructure and not possible to walk to services/facilities within 20 minutes. There is also ambiguity over parking standards, with national policy requiring reduced parking levels, however, in a Monmouthshire/rural context the car remains the dominant mode of transport and only realistic mode within Monmouthshire.
Comments also reflected repeated frustration that public transport improvements are slow to progress - for example, planned improvement to Magor Walkway, Caldicot and Chepstow railway stations, and that bus services are too infrequent and unreliable for people to use.
The Council needs to consider collaboration with bordering authorities when considering strategic transport improvements.
The key themes raised are set out below:

Key Theme	Summary of Points Raised
Support Sustainable transport	• Support sustainable transport which reduces need to travel by car and places development near public transport links [Abergavenny & Crickhowell Friends of the Earth, Vistry, Edenstone, Private Individual x2]. • Support the concept of the '20-minute neighbourhood' [Private Individual x1]. • Siting development alongside main transport corridors and increasing the frequency of public transport along those essential links is critical to ensure sustainable transport practices [Melin Homes, Sero, Tirion Homes, Candlestone Homes, [Private Individual x2]. • Respectfully suggest that the phrasing 'must' is substituted with 'should provide appropriate measures subject to site-specific considerations' [Redrow Homes Limited]. • The use of electric vehicles will change the way we travel - sections of the sustainable transport policy should change to reflect the increase in zero emission cars. WG policies driven by the need to cut car emissions will no longer be necessary [Private Individual x1].
LPA Response	Support welcomed. With regards to changing the word from 'must' to 'should,' the policy requirement for development proposals to ensure the sustainable transport hierarchy reflects national policy set out in PPW12 and Llwybr Newydd Wales Transport Strategy and is, therefore, considered appropriate and necessary. It is however recognised that Monmouthshire is a rural county and the RLDP in other policy areas supports development in rural locations. Strategic policy S13 and supporting development management policy ST1 will therefore recognise that Monmouthshire is a rural county and allows for site -specific considerations in rural locations. Policy ST1 will require Transport Assessments to be submitted and a proportionate approach taken in assessing developments in rural areas in accordance with the Sustainable Transport Hierarchy. In relation to the comment that cars will not produce emissions this is not the purpose of the policy, the purpose of the policy is to influence the way people travel and change behaviours by providing facilities and enabling the use of public transport and active travel and reduce the reliance on the private car. Policy S13 does require necessary infrastructure for Ultra Low Emission Vehicles (ULEVs)
LPA Recommendation	No changes required. Policy reference has changed to S13. Development Management Policy ST1 will also address rural transport issues and take a proportionate approach to assessing rural transport issues.
Transport issues wider than the proposed development	• The whole system needs to be considered – it must not be regarded as sufficient for a site to be developed only to connect to footpaths outside that site when in the wider networks have active travel shortcomings [Cllr Christopher Edwards, Private Individual x2].

LPA Response	Master planning of the proposed allocated sites will explore active travel connections. Strategic Policy S13 Sustainable Transport requires development proposals to maximise active travel opportunities and for developments to link to the Active Travel Network Maps (ATNM).
LPA Recommendation	No change required. The policy reference has been changed to S13.
Active travel	• Support the objective, however, how will investment in low carbon transport infrastructure enable more people to walk and cycle [Private Individual x1]. • The 20-minute neighbourhood concept must take into account topography and the feasibility for all the community to utilise the proposed walking/cycling routes. The reality of accessing local service in Chepstow particularly from the preferred site is that it is too distant to walk to local services [Cllr Christopher Edwards, Private Individual x1]. • Policy does not take account of the lack of active travel measures between the whole of the narrow southern band of development [Cllr Louise Brown]. • No cycle paths joining up Severnside (many cyclists killed/injured on the B4245) [Private Individual x1] • Active travel networks are concentrated in urban areas and do not cover links between towns and villages [Cllr Louise Brown]. • Encouragement of cycleways and separation of cycleways from roads and from footpaths to ensure separation of pedestrians from electric bikes and scooters [Private Individual x1].
LPA Response	The objective of the Policy is to support and facilitate active travel provision and active travel infrastructure where possible, such as signage and bike parking and charging facilities. We cannot control people's behaviour, but we can try to influence it. Detailed Transport Assessments (TAs) will be required to assess active travel routes and facilities and provide a Travel Plan, which would take into account topography of sites and surrounding areas to ensure practicability of such provision. The Policy makes reference to need for developments to take account of Active Travel Network Maps (ATMNs). These are maps that set out the existing active travel routes within the county and therefore will highlight were links are required for improvements to connectivity between settlements. The proposed strategic sites are all located within active travel localities and the main proportion of the RLDP spatial strategy's growth is located in active travel localities. While it is recognised that some of the proposed allocations in rural areas are not active travel locations, an appropriate amount of growth is identified in such areas in order to sustain our rural communities by providing affordable homes and development opportunities of an appropriate scale. Development proposals in Main Rural Settlements will still be required to connect to public transport facilities and PROW. The RLDP also supports the rural economy and tourism in rural locations This policy supports cycleways, which are also supported in DM Policy ST1 Sustainable Transport Proposals. Development Management Policy ST1 sets out further guidance in relation to the how to address active travel considerations in TAs specific to Monmouthshire. Guidance on Active Travel provision is also set out in National Policy PPW, Active Travel Act Guidance and the WTS.
LPA Recommendation	No significant changes required to the Strategic Policy. The reference of the Policy is now S13.
National Development Framework	• Strategic Policy S9 is intended to provide assistance to the authority and ensure the plan and supporting evidence better aligns with the requirements in the National Development Framework (NDF) [Welsh Government].
LPA Response	Comments noted.

LPA Recommendation	No change required. The Policy reference has changed to S13.
Rural nature of Monmouthshire	• The policies here work for city areas but not for rural Monmouthshire with its market towns and rural villages. Car transport may be the only realistic form of travel in town and between villages [Cllr Louise Brown]. • If you cannot reduce the requirement for all residents of all ages to travel and access facilities, then this policy is a non-starter. Residents of most rural settlements' do not have the local facilities so have to travel and 'active travel' is often not achievable [Llangybi Fawr Community Council]. • Difficult to "retrofit" sustainable transportation patterns [Melin Homes, Llanarth Estates, Tirion Homes, Candlestone Homes, Sero, Private Individual x2] • Should be recognised in rural areas that it is inevitable that there will be reliance on travel by car [Private Individual x2]. • The RLDP could employ a range of interventions to maximise sustainability. This could include linking residential, community and employment allocations to ensure delivery and co-location of facilities - we note this in regard of benefits of large allocations [Melin Homes, Llanarth Estates, Tirion Homes, Candlestone Homes, Sero, Private Individual x2], • Proportionate growth in smaller settlements can help provide a mass of population which will help support both existing and new facilities, including transport provision, education, employment. This in turn supports sustainable transport principles and the '20-minute neighbourhood' as well as discouraging car use [Monmouthshire Housing Association, Llanarth Estates, Private Individual x2]. • The concept of '20-minute neighbourhoods is not possible in several Severnside settlements. Walking from Crick for example for 20 minutes gets you to the outskirts of Caerwent. Planners cannot hide behind the get out clause that this part of Monmouthshire is exempted by the Rural Transport Clause 5.43 because by building such a large-scale development it will be made into a defacto urban area [Private Individual x1]. • Little public transport in Usk [Private Individual x1]. • Usk candidate sites will not be within 20-minute walking distance of everyday services [Private Individual x1]. • Car is king and the Welsh Government won't change that in their fantasy land [Private Individual x1]. • The final bullet point and the accompanying text is unclear. 'Demonstrating how proposed development in rural areas enables solutions to rural transport problems, such as improvement of links to public transport, digital infrastructure, and innovative solutions, such as car sharing schemes.' We would not have thought that the scale of rural development envisaged by the plan is likely to be enough to justify such improvements; they will mainly arrive from other initiatives aiming to sustain or improve rural transport services for the existing population, especially those lacking access to car [Abergavenny & District Civic Society].
LPA Response	It is recognised that sustainable transport policies are more readily applicable in an urban context, however in accordance with PPW, Future Wales and the WTS there is a need for local authorities to provide a supportive planning policy framework to enable new opportunities for sustainable rural travel and rural travel improvements. The RLDP includes localised sustainable transport policies under Strategic Policy S13 and Development Management Policy ST1 which recognises the challenges of implementing sustainable transport polices in rural locations. The Plan recognises the need for Transport Assessments to be assessed proportionally in rural locations (where the car is likely to be the dominant mode of transport) and balance the need/requirement for development in rural areas, where appropriate, and in accordance with other plan policies (rural enterprise, tourism, affordable housing) to support the rural economy. The strategic sustainable transport policy S13 also requires proposals to demonstrate innovative solutions to rural sustainable transport problems where appropriate to do so, such as car sharing schemes.
LPA Recommendation	No significant changes required, however, some changes have been made to the wording to allow some flexibility in relation to development in rural locations and recognising Monmouthshire's rural context. Policy reference has changed to S13. Development Management Policy ST1 will also address rural transport issues and take a proportionate approach to assessing rural transport issues.

Cross-boundary impacts	• Need to work with neighbouring authorities where there are cross boundary impacts and opportunities associated with development [Gloucestershire County Council]. • Many solutions to transport demand arising through new development in both Monmouthshire and Forest of Dean in Gloucestershire will centre on settlements, routes and hubs that are close to the borders of Monmouthshire and Gloucestershire. They stand to benefit from joined up working between the relevant authorities [Gloucestershire County Council]. • The Council needs to appreciate cross boundary opportunities as this is the case in terms of Little Mill and its relationship with Mamhilad [Monmouthshire Housing Association].
LPA Response	Comments noted. The Council has undertaken a Strategic Transport Assessment that has assessed the demand on the transport network and takes into consideration the impact to and from neighbouring regions. The Council will continue to work with our neighbouring local authorities on a range of cross boundary issues, including our respective growth levels, spatial strategies and transport demand and potential solutions
LPA Recommendation	The Council will continue to work with neighbouring local authorities on cross boundary impacts, such as travel.
Parking standards	• The policy should address reducing parking levels [Welsh Government]. • The wording on car-parking seems curiously old fashioned "an appropriate level of parking provision depending on the nature and location of the proposal" In a world moving toward what the document mentioned elsewhere as car-sharing, active travel, public transport improvements, everything aimed at reducing the need to use the private car then this may need re-thinking in a more imaginative set of wording [Abergavenny Transition Town]. • Parking provision must be appropriate to the levels of car ownership in the County. Currently 75% of homes in Monmouthshire have at least 2 cars and almost 50% 3 or more. For a poor example of car parking provision in a development, Bayfield estate (Woolpitch Wood) is a like a car park [Cllr Christopher Edwards, Private Individual x1].
LPA Response	Comments noted. Policy has been updated to address reducing parking requirements where deemed appropriate in Monmouthshire. It is recognised, however, that Monmouthshire is a rural county and the car is a key mode of transport in some rural areas. Monmouthshire Parking SPG is due to be reviewed by the Council's highway team following the adoption of the RLDP. The parking policy will make reference to guidance to be taken from this SPG as well as other relevant national guidance, such as Active Travel Act guidance (ATAG). Parking provision from proposed developments will also be required to be addressed in proposals' Transport Assessments/statements as set out in Development Management Policy ST1. Development Management Policy ST1 supports reduced parking levels/ car free development in town centres (sustainable locations where the car is less reliant).
LPA Recommendation	Strategic Policy S13 updated to include that cycle parking will be given 'competitive advantage' in accordance with Active Travel Act guidance. Included reference to "Appropriate level of car-parking", which will be based on Monmouthshire's adopted parking SPG. The Council's parking SPG to be updated by the Council's highway team to support the RLDP. Strategic Policy reference has changed to S13.
Public Transport	• Public Transport provision is poor in Monmouthshire [Private Individual x2]. • Public Transport alternatives are inadequate and doomed for failure under current 'commercial' service approach whereby the service providers are driven by profitability [Private Individual x2].

	• There are estates in this part of Wales where bus provision through the estate has not been considered during development. Will the RLDP state that developers must indicate where bus routes will run? [Disability Advice Project]. • Disparity between public transport provision across the county should be recognised in the Policy wording as well as the supporting text [Richborough Estates]. • Opportunities to offer an alternative to the car have been poorly progressed for a variety of factors. Priorities such as Magor Station, improvement to Caldicot and Chepstow, STJ train station ought to be fully investigated and supported addressing modal shift. There can be no further development without limiting the reliance on the road infrastructure and car ownership [Cllr Frances Taylor, Private Individual x1]. • Poor bus service in Magor/Undy – one per hour in week [Private Individual x1]. • More buses will not solve the problem if traffic congestion results in unreliable delayed journeys [Cllr Louise Brown]. • Congestion in and out of Chepstow has a very serious adverse effect on the local and regional bus service [Private Individual x1]. • Supports enhancements of Severn Tunnel Junctions and development walkway station at Magor [Private Individual x2]. • Para 5.47 should more strongly commit to the Council to provide transport measures necessary to support growth. Stating that "Monmouthshire will hope to undertake" some improvements is effectively meaningless in practical terms. The wording exposes the reality that the Council will not be able to deliver sufficient transport improvements to attract people out of their cars. [Private Individual x1] • Frequency of trains between Gloucester and Cardiff needs to be greatly improved - should be minimum every 30 minutes. User confidence will drive an increase in passenger numbers [Private Individual x1]. • Require a commuter train service directly between Chepstow and Bristol. Currently only available via STJ and travel to STJ this discourages the number of Bristol workers who live in Chepstow using train travel to commute [Private Individual x1]. • People will never be persuaded to use public transport until it is cheap, efficient, reliable and accessible to all [Private Individual x1].
LPA Response	The objective of the Sustainable Transport Policy is to support and facilitate public transport provision by locating development close to existing public transport facilities and providing links from developments to these facilities and providing a supportive policy framework for public transport infrastructure, such as signage and timetable information, shelters and seating. We cannot control people's behaviour, but we can try to influence it and provide mechanisms to encourage use of public transport. It is recognised there is scope to improve public bus and train services, however these are controlled/ funded separately by private organisations, such as Network Rail and Welsh Government operated Transport for Wales. The Council has and will continue to work collaboratively with these organisations to facilitate public transport service provision within Monmouthshire. Policy ST1 sets out further guidance in relation to the how to address Public Transport considerations in TAs specific to Monmouthshire. Guidance on active travel provision is also set out in National Policy PPW and the WTS.
LPA Recommendation	No significant changes required to Strategic Policy. Reference has changed to S13.
Home working	• Support measures aimed at encouraging remote working and the role this can play in reducing the need to travel. Achieving at high propensity of home working will reduce the need to travel in the first instance which accords with the initial aim of the sustainable transport hierarchy [Richborough Estates, Tirion Homes, [Candlestone Homes, Sero, Private Individual x2]. • Increased homeworking benefitting from improved broadband connectivity will allow workers to relocate to areas not possible previously where they can enjoy more active lifestyles and live close to family members for support and well-being [Melin Homes].
LPA Response	Comments noted and support welcomed.

LPA Recommendation	No changes required. Policy reference has changed to S13.
Local Transport Plan (LTP)	• The LTP is not yet available to comment [Abergavenny & Crickhowell Friends of the Earth, Usk Civic Society]
LPA Response	The updated LTP, now known as Local Transport Strategy (LTS) was subject to public consultation November/December 2023 and will be available to view during the RLDP Deposit consultation. The LTS will identify the key transport issues relevant to Monmouthshire and what high level interventions are needed to address these transport issues. The draft version of the LTS has been considered as part of the RLDP policy framework. Development Management Policy ST5 supports and safeguards the schemes identified in the LTS.
LPA Recommendation	No change required.
Electric Vehicle Charging (ULEVs)	• Support the principle of ULEVs, however, viability of smaller schemes will be an important consideration to the implementation of this policy [Monmouthshire Housing Association, Edenstone, Private Individual x2].
LPA Response	Support welcomed. Development proposals will be expected to meet the Council's key climate change aspirations and part of this is providing supportive policy framework for ULEV infrastructure for new proposed developments. This approach accords with the Plan's climate change policy (S4).
LPA Recommendation	No changes required. Policy reference has changed to S13.
Grid capacity	• The capacity of existing energy networks to support vehicle charging will need to be considered by national energy providers to ensure there is sufficient capacity to serve local networks [Monmouthshire Housing Association, Edenstone, Private Individual x2].
LPA Response	Comment noted. The Council has and continues to engage with National Grid regarding grid capacity. National Grid feasibility studies have been requested to inform the site allocations, to ensure gird capacity is appropriately considered and at an early stage to enable the deliverability of our policy approach including in relation to net zero carbon homes and supporting necessary infrastructure such as vehicle charging.
LPA Recommendation	No changes required. Policy reference has changed to S13.
Minerals & Waste	• Query why there is no reference to Objective 5 Minerals and Waste. Transport Infrastructure is reliant on the supply of aggregates and mineral products. Also, it is imperative that new sites do not impact upon Mineral Safeguarding Areas [Mineral Products Association].
LPA Response	In the interest of brevity, the RLDP objectives listed in the Links to Wider Framework box are those that are considered to be most pertinent to the policy in question, however, most RLDP objectives are linked to every policy in some way. It is not considered necessary to list all objectives in relation to each policy. Similarly, the Plan should be read as a whole with policies being applied as necessary and not ordered in terms of priority. It is considered Objective 5 is addressed within Policy S16 Sustainable Minerals Management and not required to be repeated within S13.
LPA Recommendation	No changes required. Policy reference has changed to S13.
Strategic Sites	• Abergavenny East will provide affordable homes in sustainable location serving the communities they are located in [Monmouthshire Housing Association].

	• P66 para 5.46 referring to rail investment and the SE Wales metro scheme it says, "the identified preferred strategic growth areas of Abergavenny East (Bayfield and Chepstow) will be limited to the town centre and railway stations via active travel connections." In the current configuration of site boundaries on Abergavenny East this looks extremely unattainable [Abergavenny Transition Town]. • Mounton Road is the most accessible option for strategic future growth in Chepstow in proximity to the town centre and train station [Barwood]. • Transport Infrastructure /additional capacity must be confidently delivered before any major new development [Private Individual x1]. • Proposed Severnside development gross overdevelopment without the transport infrastructure to support [Private Individual x1].
LPA Response	The spatial strategy of the RLDP focuses development in the most sustainable settlements. The proposed strategic sites are sustainably located edge of settlement sites and will be well connected to local services and facilities via sustainable travel options. Further detail on the sustainable travel infrastructure needed to support the delivery of site allocations is set out in the site allocation policies S8 HA1 – HA18 and the supporting Infrastructure Delivery Plan.
LPA Recommendation	No change required. Policy reference has changed to S13.
Highway design	• Require raised kerbs at bus stops [Disability Advice Project].
LPA Response	Comments Noted. Development Management Policy ST1 will require all new highway design to be inclusive to all users.
LPA Recommendation	No change required.
General/Other	• Grove Farm Care village - co-locating living, care, medical and social facilities together provides an opportunity to deliver a sustainable development with less need for vehicle trips. The care village will offer transport minibus service for residents to move to Abergavenny town and transport noes and support employees travelling to work [Grove Farm Estates & Development]. • There has been no provision to provide greater transport links in the Chepstow Plan [Private Individual x1].]
LPA Response	Site has not been progressed within the Deposit Plan.
LPA Recommendation	No change required.

Question 15 – Do you have any comments on Strategic Policy S10 Town, Local and Neighbourhood Centres?

18 organisations/private individuals submitted a response to question 15.
There was some support to the policy, including the classification of Abergavenny, Monmouth and Usk. Concern was however noted on the current performance of some of the centres, particularly Chepstow and Caldicot.
Others questioned the wording and context of the policy.

Key Theme	Summary of Points Raised
Support policy	• Welcome policy [Abergavenny Town Council and Abergavenny & District Civic Society].

	• Agree town centres should be put first as a place for people to congregate and visit [Private individual x 1].
LPA Response	Support welcomed.
LPA Recommendation	No change required.
Area specific comments in relation to town, local and neighbourhood centres	• Failure to allow for growth in Monmouth will threaten the ongoing vibrancy and vitality of the Town Centre [Redrow Homes]. • Support classification of Abergavenny as a Town Centre at the top of the retail hierarchy but should also refer to Llanfoist as it does in the settlement hierarchy [Grove Farm Estates & Development]. • Support recognition of Usk as a local centre. Believe allocating sites would support the role of Usk as a local centre [Johnsey Estates 2020 Ltd]. • Concern Chepstow Town Centre is failing and is in decline [Private individual x 1] • Concern Caldicot Town Centre is a dead town centre both commercially and as a community hub, in order for Caldicot East to be an attractive proposition to newcomers would need it to already be a thriving and active place [Private individual x 1].
LPA Response	The spatial constraint in the Monmouth area relating to phosphates has been removed since the consultation on the Preferred Strategy and as a consequence has site allocations within the Plan which will provide additional support for the Town Centre of Monmouth. Disagree that Llanfoist should be included within the retail hierarchy as both the Central Shopping and Commercial Area and Primary Shopping Frontages are located within the Town Centre of Abergavenny. Usk has been redesignated as a Minor County Town Centre and as a result has a Central Shopping and Commercial Area designation which provides a level of protection to the area. The detailed policies within the RLDP provide protection to the existing Town Centres in Monmouthshire. It is recognised that in some instances regeneration initiatives and environmental improvements may be necessary and these are supported through the policy framework of the RLDP.
LPA Recommendation	No change required.
Town centre first approach	• Note Town centre should come first, reference made to petrol station near High Beech roundabout, Chepstow suggesting this policy has not been applied [Cllr Louise Brown].
LPA Response	Comment noted. The Town Centre first approach is reflected within the Plan's policy framework in accordance with national planning policy.
LPA Recommendation	No change required.
Policy wording and context	• Not clear in how the aim of enhancing the role and function of town centres will be achieved in the future. Suggests this is aspirational and ignores the current decline in achieving those objectives for either Caldicot or Chepstow [Private individual x 1]. • Proposed solutions in policy do not instil confidence in a quick and robust improvement to the quality and diversity of facilities [Private individual x 1].
LPA Response	Comment noted, the detailed policies within the RLDP provide protection to the existing Town Centres, Local Centres and Neighbourhood Centres in Monmouthshire. It is recognised that in some instances regeneration initiatives and environmental improvements may be necessary and these are supported through the policy framework of the RLDP.

LPA Recommendation	No change required.
Other	• Would like to work with Monmouthshire on all issues concerning town centre planning, placemaking under the transforming towns programme and Place Plans [Abergavenny Town Council and Abergavenny & District Civic Society]. • Questions whether the RLDP will force developers to provide essential elements of the community such as community halls, shops and affordable housing at an early stage [Disability Advice Project]. • Usk is mentioned as somewhere that would benefit from more opportunity to walk and cycle but understand has not been allocated any of the active travel budget [Private individual x 1]. • Reference is made to specific properties in Abergavenny requesting a review of uses of vacant properties/sites [SOUL]. • State Caldicot should be regenerated as it has an anti-social behaviour problem [Private individual x 1]. • Desperate need to review the business rates system at a national level. Will help address vacancies in centres [Private individuals x 3] • Traffic congestion in south-east Monmouthshire is impacting on Chepstow Town Centre [Private individual x 1]. • Suggestion that Chepstow does not fulfil role effectively as Gateway to Wales due to lack of amenities and lack of effective planning for increased levels of traffic. Essential to ensure large scale developments are put into this context to ensure present and future residents are given opportunity to live close to viable towns and able to travel easily in and out of towns for additional needs that cannot be met by those towns such as access to A&E [Private individual x 1] • Caldicot East will increase the numbers of people using the town, the number of parking spaces will need to be increased to allow for this, particularly disabled spaces [Private individual x 1]. • Suggestion one of the main reasons for the decline of Caldicot and Chepstow is the removal of the bridge tolls which makes shopping centres in Bristol more accessible [Private individual x 1]. • More needs to be done to entice exciting new businesses to open, not just hair salons, barbers and coffee shops [Private individual x 1].
LPA Response	Comments noted. The RLDP process allows for consultees to be involved at key stages of the plan preparation process. Infrastructure requirements will be assessed on a site-by-site basis. All of the allocated housing sites must deliver 50% affordable housing, details of the phasing to be agreed through trigger points in S106 agreements. An Infrastructure Delivery Plan has also been prepared which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of the allocated sites. Site specific considerations are included as an appendix to the Deposit Plan. Details of active travel funding streams are outside of the RLDP remit. Contributions towards active travel, walking and cycling routes can, however, be provided as part of developments and will be considered on a site-by-site basis based on evidence in Transport Assessments and Masterplans of proposals. An Infrastructure Delivery Plan has also been prepared which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of the allocated sites. Site specific considerations are included as an appendix to the Deposit Plan. The Urban Housing Potential study considers vacant sites and is included as part of the evidence base for the RLDP process. Vacant properties is a separate issue that is being considered in other departments of the Council, this is beyond the remit of the RLDP. It is recognised that in some instances regeneration initiatives and environmental improvements may be necessary for the County's Town Centres and these are supported through the policy framework of the RLDP. Business rates are set by national government and are outside of the remit of the RLDP process. Candidate site submissions have been considered as part of the candidate site assessment. Individual site recommendations can be viewed in the Candidate Sites Assessment Report.

LPA Recommendation	No change required.

Question 16 – Do you have any comments on Strategic Policy S11 Community and Recreation Facilities?

17 organisations or members of the public submitted a response to Question 16 – Community and Recreation facilities. Comments generally related to support for the policy, however, with suggestions for improvements. It was also noted that the policy was written for town/local centres (within/adjoining boundaries) and rural settlements/ areas outside of boundaries would benefit from the provision of some appropriate facilities.
The key themes raised are set out below:

Key Theme	Summary of Points Raised
Support policy	• Support this policy and the emphasis it places on protecting and retaining value facilities. Para 5.57 confirms to include buildings used for cultural purposed we suggest minor addition to include theatres on list of examples [Theatres Trust].
LPA Response	Support welcomed and comments noted. It is agreed theatres are important cultural facilities for communities.
LPA Recommendation	No significant changes required, however, minor wording changes have been made, including reference to theatres. The policy reference has changed to S15.
Provision Integral to new proposals	• Such elements should be integral to all new proposals. The Well-Being Act directs us to consider an active lifestyle and wellbeing as important aspects of daily life. This is not going to be achieved by adding development to existing communities that are already lacking in provision and where the new development lies further away from facilities and the size of the development doesn't warrant increasing the provision [Melin Homes, Llanarth Estates, Tirion Homes, Candlestone Homes, Sero, Private Individual x2].
LPA Response	Comment noted. The Settlement Hierarchy set out in Policy S2 reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. New allocations proposed in main rural (Tier 3) settlements reflect their position in the settlement hierarchy as our most sustainable rural settlements, and the spatial strategy is to direct growth to rural areas/communities that already have existing facilities on the basis that new growth will help maintain patronage and viability to existing community facilities in main rural settlements, rather than direct growth to smaller minor villages that do not have such provision.
LPA Recommendation	No significant changes required. The policy reference has changed to S15.
Suggested changes to policy/wording	• This policy should go further, acknowledging the viability issues often associated with delivering such uses in isolation and therefore to allow for enabling residential development [Redrow Homes]. • "Development proposals that result in the 'unjustified' loss of community and recreation facilities will not be permitted." Need to remove the word "unjustified" as provides better protection to community facilities [Cllr Louise Brown]. • "Where a town or local centre location is not available or appropriate, development proposals that provide and/or enhance community and recreation facilities will be permitted within or adjoining settlement boundaries subject to detailed planning considerations – suggest the following is

	added " but not permitting such development adjoining settlement boundaries when this results in not protecting the green gaps between villages an between villages and towns to protect their distinct character and identity" [Cllr Louise Brown].
LPA Response	Although it is appreciated that viability of delivering community facilities in isolation is challenging, the plan led system in Wales requires residential allocations to come through the RLDP process. It is therefore not considered appropriate to include an enabling development exception policy within the RLDP for provision of community facilities. Enabling development circumstances are set out in National Policy. Justifications for the removal of community facilities are set out in Policy CI1 'Retention of Existing Community Facilities'. This policy sets out the justification tests and evidence required, such as viability evidence and marketing of a community facility, in order to justify the loss of change of use. It is considered that these tests are robust and fair because in some instances a loss of a community facility may be appropriate and, therefore, it is not considered necessary to remove the word 'unjustified'. Policy CI3 sets out the justification tests for loss of recreational facilities and public open space, and similarly these tests are considered to be robust and balanced This Policy allows for development adjoining settlement boundaries where appropriate and subject to detailed planning considerations. In terms of protecting green gaps/coalescence between villages proposals green wedge national policy will apply in the assessment. National Policy does allow for some community facilities if it maintains the openness of the green wedge land. Policy CI3 safeguards open space designations.
LPA Recommendation	No significant changes required, policy reference has changed to S15.
Public Open Space	• Public open space and amenity and are essential for the health and well-being of residents and there needs to be a separate policy on this topic or incorporated into Policy S11. New Policy suggested as follows "Where there is a new development the provision of open space and amenity land must always be included. Development will not result in any loss of public open space and amenity lands which must be protected, maintained and enhanced in its current location to continue and protect the green infrastructure already included within previous developments." [Cllr Louise Brown].
LPA Response	Comments noted. Development Management Policies CI2, CI3 and CI4 provide set out the detailed policy framework relating to the provision of open space and the protection of open space and amenity land.
LPA Recommendation	No significant changes required, however minor wording changes have been made and the policy reference has changed to S15.
Allotments	• Allocation for allotments and community growing projects in Abergavenny would be welcomed. [Abergavenny Town Council, Abergavenny & District Civic Society].
LPA Response	Comments noted. The policy provides support for allotment and community growing areas.
LPA Recommendation	No significant changes required, the policy reference has changed to S15.
Rural facilities	• Many rural settlements have no community or recreational facilities. It is not clear how this policy will be able to change this[Llangybi Fawr Community Council]. • Policy is written in such a way that there is assumption that community facilities will be located within a town or local centre. Some facilities listed are more likely to be better suited to areas outside of defined centres (e.g., cemeteries, allotments). The range of recreation facilities referred to in Para 5.59 are in most cases likely to be suited to areas outside of defined centres [Richborough Estates].

LPA Response	Note that it can be difficult for new community and recreational facilities to come forward in rural settlements for various reasons, including viability. The policy, however, does support their provision. Furthermore, supporting Development Management policies protect existing community facilities within rural settlements (policy CI1) and protect recreation and open space (policies CI3 and CI4). The Policy does refer to community facilities being permitted adjoining settlement boundaries, this may be appropriate in some instances for cemeteries and allotments.
LPA Recommendation	No significant changes required, policy reference has changed to S15.
Other	• There are no community facilities on large strategic sites so car travel to facilities is essential [Private Individual x1]. • What facilities? A new community hall in Magor and Undy where there are already several more that are barely used [Private Individual x1]. • Proposed solutions do not instil confidence in a quick and robust improvement to the quality and diversity of the facilities [Private Individual x1]. • Insufficient now [Private Individual x1].
LPA Response	The larger strategic developments allocated within the plan - Land at Abergavenny East (policy HA1) and Land to the east of Caldicot (policy HA2) - are being masterplanned and it has been demonstrated that it is viable and feasible to include community facilities as integral elements of the schemes, such as local centres and playing fields. Active travel and footpath links within the sites will enable travel to these community facilities by other means than car and active travel and footpath links from/to the site will link these strategic sites to existing community facilities. Magor Community Hub is a modern multi-functional facility that is considered positive asset to the community by many. If community facilities in the area are no longer fit for purpose then policy CI1 'Retention of Community Facilities' allows tests for their re-purpose. Policy is there to provide the supportive framework for community facilities and for their protection, however, as recognised it is not the only mechanism to bring them forward.
LPA Recommendation	No significant changes required, policy reference has changed to S15.

Question 17 – Do you have any comments on Strategic Policy S12 – Employment Sites Provision

26 organisations or members of the public submitted a response to question 17.
Comments noted the importance of allocating suitable employment allocations alongside residential allocations. The need to provide further clarity on the Preferred Strategy proposal to increase job growth above past trends was also highlighted.

Key Theme	Summary of Points Raised
Allocations	• Concerned at the low level of candidate sites in Abergavenny/Llanfoist – suitable allocations should be made. [Abergavenny Town Council, Abergavenny & District Civic Society] • Residential development must take place in parallel with economic development. [Abergavenny Town Council, Melin Homes, Llanarth Estates, Tirion Homes, Candleston Homes, Sero, Private Individuals x 2] • Important a range of sizes and types of employment allocations are made across the settlement hierarchy. [Llanover Estates, Tirion Homes, Candleston Homes, Sero, Private Individuals x 2] • Important that land allocated for B uses are not released for other uses. [Abergavenny & District Civic Society]

	• Cumulative impact on the Gwent Levels should be considered when assessing candidate sites in Magor/Undy. [Cllr Frances Taylor] • Only two candidate sites for employment use in the countryside have been accepted for further assessment. It is evident that there will be a shortage of employment land to meet the targets. Further consideration should be given to the role of brownfield sites in non-isolated rural locations. [Private Individual]
LPA Response	It is acknowledged that limited candidate site options for employment use were received for the Abergavenny area and consequently, this has resulted in Abergavenny accommodating 3% of the employment land allocations. The Council will, however, continue to explore opportunities to bring forward vacant premisses in Abergavenny for employment use, in conjunction with the Cardiff Capital Region (CCR) and relevant partners. The RLDP aims to broadly align the spatial distribution of housing and employment growth through-out the County and provide a range and choice of sites. Detailed site allocations are set out in the Employment and Economy section of the Plan under Policies EA1a-EA1m. Policy E1 – Protection of Existing Employment Land seeks to ensure land identified for employment uses is not lost to alternative uses. The cumulative impacts of site allocations are considered as part of the Integrated Sustainability Assessment and the Habitats Regulations Assessment. A key requirement of the High-Level Candidate Site Assessment was the compatibility of the site with the RLDP Preferred Strategy, part of which was the requirement to be within or adjoining the settlement boundary or the ruling out of sites in the open countryside unrelated to any settlement identified in the Settlement Hierarchy. This approach is consistent with national guidance which aims to locate development in the most sustainable and well-linked settlements. The RLDP does, however, include a policy framework to consider rural enterprise and rural diversification proposals, which will be considered on the site-specific merits.
LPA Recommendation	Policy S12 of the Preferred Strategy is now titled Policy S10 – Employment Site Provision as a result of policy numbering being amended earlier in the Plan. The Deposit Plan makes provision for 57ha of employment land to meet the minimum requirement of 38ha identified in the Employment Land Review. The overarching principles of the policy remain the same, however, some wording changes have been made following a review of the whole Plan to better reflect the policy intention.
Job Provision	• Council's strategy to increase job growth above past trends will require greater clarity in the Deposit plan to evidence how the Council's economic ambitions will be achieved. [WG, SOUL, Private Individual] • Need to rethink use of the phrase 'economic growth and resilience' – some parts of economic growth are un-resilient when put under a contemporary perspective of climate and nature emergency considerations. [Abergavenny Transition Town] • Policy should recognise the employment opportunities can come from various sources not just B use classes. [Grove Farm Estates & Development] • Policy does not seek to enhance the employment opportunities for internal workers for the need and demands of the demographics of Monmouthshire. [Cllr Louise Brown] • Create jobs first and improve infrastructure, then look at the requirement for housing. [Private Individual] • Most people travel out of the area to major cities for employment. Don't need employment here due to proximity to major towns and cities and level of working from home. [Private Individuals x 2]
LPA Response	The jobs figure contained in the RLPD is based on demographic-led modelling which is considered to be robust and includes reasonable assumptions. The associated jobs figure represents the number of jobs that could be supported by the population and housing growth planned for over the Plan period. It is recognised that it is above the baseline forecasts, however, a policy-on approach provides an appropriate basis for the RLDP to ensure that the Plan can be sufficiently flexible in respect of changing circumstances and that the County can support long term growth in accordance with Welsh Government policy, which encourages the adoption of a long term and positive strategy, and the ambitions of the CCR. Whilst it is recognised the jobs target of 416 jobs per annum is higher than some past trends, it is within the range of past performance in the County.

	The proposed level of growth aims to provide a balance of housing and employment growth, as required by national planning policy. This alignment means that economic growth will not be undermined by inadequate housing or be reliant on unjustified levels of in-commuting. Similarly, the level of housing will not give rise to high levels of out-commuting. Supporting this level of growth will reduce the need to travel and travel to work distances, which will assist in addressing our challenges in relation to the climate and nature emergency and contribute towards a more balanced demographic profile in Monmouthshire The RLDP recognises that not all job growth will come from B Use Class uses and includes a policy framework to assess employment proposals in a range of sectors including retail, tourism and commercial uses.
LPA Recommendation	No change required.
Site Specific	• Glascoed site is a major employer and should be covered by a suitable policy to support its future, ongoing use and/or allocate the Glascoed site as a 'Protected Employment Site'. [BAE Systems] • SAE1h – Land at Pill Row should be retained as an employment allocation. [F1 Real Estate Management Ltd]
LPA Response	The contribution the BAE Systems Glascoed site makes to the Monmouthshire economy is recognised, however, given the scale and location of the site in the open countryside, it is not considered appropriate or necessary to allocate it for an employment use. Any enhancement proposals that come forward would be considered on their planning merits within the context of the existing use of the site. Candidate Site CS0007 – Land adjacent to Pill Row has been considered as part of the High-Level Candidate Site Assessment. This concluded that the site should not progress to Level 3a of the Candidate Site Assessment due to it being contrary to national planning policy in relation to flooding.
LPA Recommendation	No change required.
General	• Reference to objection 5 – Minerals and Waste should be made in relation to Policy S12. [MPA] • Dwr Cymru will support economic development, however, obligations as a water and sewerage undertaker extends to 'domestic' supplies only. Where an employment allocation results in higher demands of water supply and/or trade effluent discharges we recommend early consultation. [Dwr Cymru] • No more out of town sites that make the population unhealthier – no fast-food places needed. [Private Individual]
LPA Response	In the interest of brevity, the RLDP objectives listed in the Links to Wider Framework box are those that are considered to be most pertinent to the policy in question, however, most RLDP objectives are linked to every policy some way. It is not considered necessary to list all objectives in relation to each policy. Consultation and dialogue with Dwr Cymru have been ongoing throughout the preparation of the plan and identification of site allocations. In accordance with national policy, the Plan has a town centre first approach to uses such as restaurants and take aways including fast food premises. Any proposals that come forward will be assessed against the RLDP policy framework on a site-by-site basis.
LPA Recommendation	No change required.
Site promoted in response to question 17	• BAE Systems – reference to Glascoed site not being in the CS register and that it should be allocated as a unique employment allocation. [BAE Systems] • F1 Real Estate Management Ltd – SAE1h Pill Row [F1 Real Estate Management Ltd] • Private Individual – CS0016 – East of little Mill; CS0139 – Land at Former Petrol Station, Llanover [Private Individual]

LPA Response	The BAE Systems site has been considered for its appropriateness to be allocated as a Protected Employment Allocation under policy EA2. However given the scale and its location of the site in the open countryside, it is not considered appropriate or necessary to allocate it for an employment use. Any enhancement proposals that come forward would be considered on their planning merits within the context of the existing use of the site. Candidate site submissions have been considered as part of the candidate site assessment. Individual site recommendations can be viewed in the Candidate Sites Assessment Report.
LPA Recommendation	See the Candidate Sites Assessment Report for Candidate Site recommendations.

Question 18 – Do you have any comments on Strategic Policy S13 Rural Enterprise?

17 organisations or members of the public submitted a response to Question 18 – Rural Enterprise. Comments were supportive of the policy with some comments requesting that the policy wording be tighter to protect open countryside and Monmouthshire's valuable farmland. Other comments were supportive of rural enterprise and would like to see supportive policy framework in relation to local food production and re-generate small holdings and vacant brownfield land outside settlement boundaries.
The key themes raised are set out below:

Key Theme	Summary of Points Raised
Supportive of diversification where there is clear link to local communities	• Supportive of diversification of the rural economy where there is a clear link to local communities. Supportive of encouraging tourism uses within proximity to transport corridoes giving access to key local facilities and services. This can positively support the rural economy and ensure local provisions remain viable and available to the community as a whole [Melin Homes, Llanarth Estates Tirion Homes, Candlestone Homes, Sero Homes, Sero, Private Individual x2].
LPA Response	Comments noted.
LPA Recommendation	No change required. However, due to changes earlier on the Deposit Plan the Strategic Rural Enterprise Policy is now numbered S11.
Disagree for new build	• Agree to the re-use of existing buildings but disagree to new buildings/sites [Private Individual x1].
LPA Response	The policy objectives of S13 are consistent with policy guidance set out in PPW, particularly paragraph 5.6.3.
LPA Recommendation	No change required. However, due to changes earlier on the Deposit Plan the Strategic Rural Enterprise Policy is now numbered S11.
Term definitions	• This policy area uses terms such as 'rural' 'agricultural' and 'farm diversification' without being clear of the meaning which are quite different [Abergavenny & District Civic Society].
LPA Response	The terms used are consistent with PPW, TAN 6 and Future Wales, Policies 4 – Supporting Rural Communities and Policy 5 Supporting the Rural Economy. The supporting text to Policy S13 also provides further clarification on the terms rural enterprise and agricultural diversification, consistent with TAN 6.

LPA Recommendation	No change required. However, due to changes earlier on the Deposit Plan the Strategic Rural Enterprise Policy is now numbered S11.
Need for local policy for small holdings/ local production/ housing to support small holding food production	• Supportive to see produce grown and distributed locally and the range of products and rural innovations extended to reduce the resilience on imported goods, so people are aware of the value of the countryside and locally grown produce [Melin Homes, Llanarth Estates, Tirion Homes, Candlestone Homes, Sero Homes, Sero 2954, [Private Individual x2]. • Suggest there is a need for a policy that responds to changes in farming and horticulture that are increasing the demand for small new holdings accompanied by an appropriately sized tied dwelling. The present LDP makes no reference to One Planet developments and recent applications assessed against rigorous Welsh Government guidance. There should be a wider enabling policy. As part of response to climate change emergency planning policy now needs to contribute to the enabling a return to smaller holdings serving local communities [Abergavenny & District Civic Society]. • This policy (alongside Policy S2 outside Tier1-Tier 4 settlements) suggests that a re-population of the countryside might be possible for smaller holders and small farmers and maybe it is other factors currently outside planning that make the achievement of this goal seem unattainable [Abergavenny Transition Town]. • There is a strong emphasis on the need to regenerate the County's rural economy and rural settlements. The policy specifically refers to local food production (5.107) though the list of examples does not include efficient commercial regenerative agriculture on small farms. This is also recognised in Monmouthshire 2040: Our Economic Growth and Ambition Statement – this draft plan envisages rural development outside settlement development boundaries it of a scale and type compatible with the surrounding areas. Sometimes it will be possible to adapt existing buildings but building assets of much agricultural land have already been stripped and the land can only be brought back to efficient use by building small farmhouses. This process needs to be set out in the Deposit RLDP [Our Foods].
LPA Response	Strategic Policy S2 establishes the principle of rural enterprise dwellings and one planet development in locations outside of the settlement boundaries. Detailed guidance on the criteria applicable to each type of development is set out in TAN 6: Planning for Sustainable Rural Communities and One Planet Development Practice Guide and in accordance with WG guidance are therefore not repeated in the RLDP.
LPA Recommendation	No change required. However, due to changes earlier on the Deposit Plan the Strategic Rural Enterprise Policy is now numbered S11.
Employment uses limited to rural diversification	• Whilst appreciated that this policy is the only one addressing new development for employment use in the countryside, the scope is significantly limited to proposals for rural diversification. The policy fails to acknowledge the diversity of the countryside and consequently brownfield sites for employment in non-isolated locations are not taken in account for the purposes of the Growth Strategy [Private Individual x1].
LPA Response	Policy S13 of the Preferred Strategy addresses both rural diversification and rural enterprises. The Deposit RLDP also supplements this with detailed criteria-based policies to assess any proposals that come in on their merits. This is sufficient to consider a range of proposals.
LPA Recommendation	No change required. However, due to changes earlier on the Deposit Plan the Strategic Rural Enterprise Policy is now numbered S11.
Rewording suggestions	• Policy to be reworded to take account of highway impact of rural diversification proposals. It is important to add because a few developments along a rural agricultural lane between Pwllmeyric and Shirenewton which is single track have been approved, however, intensification is making the road impassable and damaging hedges and verges. This road network is a very important consideration for residents who live on farms and undertake farming activities [Cllr Louise Brown].

LPA Response	Highway considerations are covered by Strategic Policy S9 – Sustainable Transport and other detailed Development Management policies set out in the Deposit Plan, particularly MV1. Planning applications need to satisfy all relevant policies of the RLDP and therefore do not need to be repeated in S13 (now S11 in the Deposit Plan).
LPA Recommendation	No change required. However, due to changes earlier on the Deposit Plan the Strategic Rural Enterprise Policy is now numbered S11.
Farmland to be protected	• Value farmland [Private Individual x1]. • Our rural economy must be protected, and the development of agricultural land must not be allowed [Private Individual x1].
LPA Response	The RLDP seeks to protect best and most versatile agricultural land, however, this is not always possible in a Monmouthshire context given the high prevalence of high-quality agriculture land in the County. All four of the County's most sustainable settlements are surrounded by BMV agricultural land and it is therefore not possible to avoid development of such land via a different spatial strategy.
LPA Recommendation	No change required.
Other	• The housing development in Usk runs contrary to all factors mentioned [Private Individual x1].
LPA Response	The level and distribution of growth throughout the County reflects the findings of the Sustainable Settlement Appraisal which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. The level of growth proposed for Usk is considered to be appropriate for its position in the spatial hierarchy.
LPA Recommendation	No change required.

Question 19– Do you have any comments on Strategic Policy S14 Visitor Economy?

13 organisations or members of the public submitted a response to Question 18 –Visitor Economy. Comments were in general support for the policy supporting to boost Monmouthshire's economy and improve people's health and well-being, however concerns were raised into managing resulting impact, such as increased car movements and potential effect upon Monmouthshire's natural beauty.
The key themes raised are set out below:

Key Theme	Summary of Points Raised
Supportive of policy	• Understand the importance of tourism to the economy of Abergavenny and the wider hinterland. Support the policy and look forward to developing our Placemaking plans in partnership with the County Council [Abergavenny Town Council]. • Supportive of measures that actively encourage sustainable economic growth in the heart of the authority as opposed to M4 corridor. The 'stay local' advice that arose during Covid19 has encourage people to re-discover their local area and wider countryside [Llanarth Estates, Tirion Homes, Candlestone Homes, Sero Homes, Sero, Private Individual x2].
LPA Response	Support welcomed.

LPA Recommendation	No significant changes required, the policy reference has changed to S12.
Suggests rewording to policy	• Reword to ensure tourist facilities are located in areas that have the necessary facilities include toilets, parking and highway capacity [Cllr Louise Brown].
LPA Response	Comment noted. Development Management Policy 'T1 New of Extended Tourism Accommodation and Facilities in the Open Countryside' sets out specific tests and criteria to ensure that tourism proposals are sustainable and are demonstrated to provide positive benefits. A Sustainable Tourism Need and Impact Assessment will be required to support tourism proposals.
LPA Recommendation	No significant changes required, the policy reference has changed to S12.
Opportunity for marketing of tourist sites	• The LDP process is allowing identification of smaller candidate sites for protection, most of which have unique features such as SSSI, SINC status and other attributes. Some of these have more than one of these attributes and when taken together offer an opportunity for new tourism marketing to enhance the visitor economy even further [Private Individual x1].
LPA Response	Comment noted. Monmouthshire benefits from extensive natural assets, some which act as a tourist attractor, such as BBNP, Wye Valley National Landscape (AONB) and Gwent Levels. It is important however that these natural assets are protected and Policy T1 sets out criteria to protect our natural environment, as well as other policies within the plan including S5 and NR1.
LPA Recommendation	No significant changes required, the policy reference has changed to S12.
Adverse impact on landscape	• Monmouthshire is outstanding area of beauty and would be attractive to visitors but not if congestion problems continue [Private Individual x1]. • By allowing green spaces and historical landscapes to be developed would result in the decline of visitors to the area [Private Individual x1].
LPA Response	Comment noted. Development Management Policy T1 provides further guidance and policy tests for tourism proposals within Monmouthshire. One of the test criteria (g) is that the proposal must 'protect, maintain, and enhance landscape character, biodiversity, the resilience of ecosystems and the historic environment', criteria (i) requires 'necessary infrastructure capacity' and (j) requires proposals to 'prioritise, promote and facilitate sustainable travel and have safe and efficient highway design.' Tourism proposals will therefore be required to meet these criteria set out in the policy (as well as other criteria) and also demonstrate the need and impact of a proposal with a 'Sustainable Tourism Needs Impact Assessment.' Other policies within the plan will also be relevant and applicable to assessing tourism proposals.
LPA Recommendation	No significant changes required, the policy reference has changed to S12. Policy T1 provides further guidance and tests for sustainable tourism proposals within Monmouthshire.
Other	• Visitor economy is minimal in Chepstow bar the races. Chepstow has lost its attraction and the points raised here are vague [Private Individual x1].
LPA Response	Comment noted. S12 and accompanying Development Management Policy T1 provides supportive framework for tourism proposals within Monmouthshire.
LPA Recommendation	No significant changes required, the policy reference has changed to S12.

Question 20 – Do you have any comments on Strategic Policy S15 – Sustainable Waste Management?

13 organisations or members of the public submitted a response to question 20.
Comments were generally supportive of the policy but noted that waste is not restricted to household and commercial waste.

Key Theme	Summary of Points Raised
Support Policy Aims with amendments	• Supportive of policy, however, waste is not restricted to household and commercial waste. Significant amount of agricultural waste – innovative technologies should be considered, such as anaerobic digestion. [Melin Homes, Llanarth Estates, Tirion Homes, Candleston Homes, Sero Homes Sero, Private Individuals x 2] • Helpful to add a criterion noting that the storge and collection of waste or the unauthorised dumping of materials on sites without planning permission will be subject to enforcement proceedings. [Cllr Louise Brown]
LPA Response	Policy W1 of the Deposit Plan sets out the Council's policy approach to open windrow composting and anaerobic digestion in rural locations. Policy S15 (now S17) – criterion v) addresses the need for storage and collection of waste in new developments. Enforcement action is subject to separate regulations and therefore does not need to be set out in policy.
LPA Recommendation	No change required, however, note that Policy S15 – Sustainable Waste Management is Policy S17 in the Deposit Plan.
Operational Issues	• Introduction of wheely bins is not suitable. [Private Individual] • No longer any municipal waste facility in Usk – noticeable increase in fly-tipping in the area since its closure. [Private Individual] • Stop charging garden waste as an 'extra'. [Private Individual] • Reusable bags for recyclables will most likely result in litter being created as rubbish escapes bags. [Private Individual]
LPA Response	Comments noted, however, these relate to the operational side of waste collection and have been passed onto the relevant development for information.
LPA Recommendation	No change required.

Question 21 – Do you have any comments on Strategic Policy S16 – Minerals?

6 organisations or members of the public submitted a response to question 21.
Comments noted the policy requirement to prepare a Statement of Sub-Regional Collaboration to ensure mineral apportionments set out in the RTS2 are met. Detailed policy wording amendments were suggested by the Mineral Products Association.

Key Theme	Summary of Points Raised
Mineral Products Association (MPA) comments	• Amend policy to read: i) safeguarding known/potential sand and gravel, (delete crushed rock) (replace with) sandstone and limestone resources for possible future use, as well as the minerals related infrastructure. [MPA] • Amend policy to read ii) maintaining a minimum 10-year crushed rock (add word minimum), 7 years land-based sand and gravel reserves throughout the plan period in line with the requirements of the (add wording) national planning policy in PPW and the latest Welsh Government Technical Statement on Aggregates. [MPA] • Clarification sought on how the required 7 years land-based sand and gravel requirement will be met – assume identification of Preferred Areas or Areas of Search is site specific allocations are not brought forward. [MPA] • Paragraph 5.91 should include the following revisions – "This seeks to ensure that valuable finite resources are safeguarded for possible extraction (add) [together with mineral infrastructure] and that the use of secondary and recycled aggregates is maximised in preference to primary aggregates." [MPA] • SWRAWP annual report indicates that Ifton Quarry has been inactive for years. RTS also recognises that much of the limestone resources in South Wales lie beneath the water table within a principal aquifer. Seek clarification of how the LPA will deliver a steady and adequate supply to deliver the local plan aspirations particularly if no allocations are being brought forward. Suggest identification of Preferred Areas or Areas of Search if site specific allocations are not brought forward. [MPA] • Paragraph 5.95 – "safeguarding areas for potential sources of sand and gravel and crushed rock aggregates, (add text) [together with mineral infrastructure], will be identified on the Proposals Maps accompanying the Deposit Plan in accordance with (add text) [PPW, the RTS], the National Minerals resource Maps and the National Aggregates Safeguarding Maps for Wales." [MPA] • Welcome clear policy requirements for buffer zones in the Deposit Plan. Also seek assurances that criteria against which mineral applications are considered are covered in DM policies applied to all developments, not just minerals. [MPA]
LPA Response	Reference to crushed rock replaced with sandstone and limestone for clarification on the crushed rock applicable in Monmouthshire's case. Specific reference to mineral related infrastructure not considered necessary as that would have to form part of a planning application. The RTS2 states that land-won sand and gravel is dredged from the Severn Estuary and Bedwin Sands. Discussions with British Marine Aggregate Producers Association (BMAPA) in 2019 suggest that similar levels of marine aggregates production are likely to continue in future years. The RTS2 therefore concludes that it is reasonable to suppose that marine-dredged aggregates will continue to supply a similar proportion of overall demand as they have done over the last decade and applies zero apportionment to Monmouthshire for sand and gravel reserves. Reference to maintaining a 7-year land bank for sand and gravel reserves has been removed from the policy to avoid confusion. The RLDP and reliance on reserves at Ifton Quarry to meet its apportionment is consistent with the recommendations of RTS2. Recent planning applications to discharge conditions at Ifton Quarry indicate that Hanson Aggregates intend to commence working at the quarry. A buffer zone has been included in the Deposit Plan around Ifton Quarry. The Deposit RLDP notes that mineral planning applications will be considered against national planning policy set out in PPW and MTAN1, as well other detailed policies of the Plan.
LPA Recommendation	Change reference to crushed rock to sandstone and limestone in Strategic Policy S16.

Coal Authority Development Risk Plans	• The Coal Authority has provided Development Risk plans for the Monmouthshire Area. This data identifies those parts of the area where coal mining features are recorded to be present at surface and shallow depth. LPA is expected to assess any sites being considered for allocation against this data in order to ensure that any constraints or issues arising as a consequence of the coal mining features can be identified at an early stage in the process. [Coal Authority]
LPA Response	Comments welcomed. Based on the information on the Coal Authority's interactive maps, there are no RLDP allocations located within identified Development High Risk Areas or features recorded to be present at surface and shallow depths. Interactive Map Viewer | Coal Authority (bgs.ac.uk)
LPA Recommendation	No change required.
Regional Collaboration	• Torfaen CBC are ready to work with neighbouring LPAs on the former Gwent Statement of sub-regional collaboration as regards aggregate minerals in time for your deposit. [Torfaen CBC] • It is a requirement of the RTS2 for all authorities, including Monmouthshire, to agree a Statement of Sub-Regional Collaboration (SSRC) on their contribution to the future provision of aggregate production in the Former Gwent sub-region. A SSRC is pertinent for the region as the RTS2 identifies a shortfall of crushed rock in Newport and Torfaen, with extensive unworked reserves in Monmouthshire. [WG] • Not aware of any progress on the sub-regional statement of collaboration. [MPA] • Gloucester CC do not consider it likely that materially significant mineral and waste impacts will emerge for Gloucestershire CC as a result of implementing the PS proposals. [Gloucestershire CC]
LPA Response	Monmouthshire CC is in ongoing discussions with the other authorities making up the Former Gwent Sub-Region and the latest position on satisfying the RTS2 apportionments is set out in the SSRC Position Paper.
LPA Recommendation	Continue ongoing discussions with the Former Gwent Sub-Region.
General	• Add reference to national and regional policy requirements to the policy wording for clarity. [Cllr Louise Brown]
LPA Response	The policy and supporting text already set out national and regional policy requirements.
LPA Recommendation	No change required.

Question 22 – Do you have any comments on Strategic Policy S17 Green Infrastructure, Landscape and Nature Conservation?

30 organisations or members of the public submitted a response to Question 22 –Green Infrastructure, Landscape and Nature Conservation.
There is overall support for the Policy however some requests for wording changes and technical policy wording. Some respondents feel that proposing development on Greenfield land contradicts with the purpose/aims of this Policy.
The key themes raised are set out below:

Key Theme	Summary of Points Raised
Supports Policy	• Supports the principle of Policy S17 [Vistry]. • Principle supported, however, the Plan should be cautious not to over burden individual sites with policy requirements both through S17 and others that risk making otherwise viable sites undeliverable [Redrow Homes]. • Supports policy, but they are not reflected in the High-Level Assessment of the Candidates Sites [Mrs Shan Henshall]. • Supports Policy but the Preferred Strategy does not comply with the aims of this Policy. The Council's predetermination of the Preferred Site in Chepstow cannot maintain, protect or enhance the County's landscape [Cllr Christopher Edwards, Private Individual x1].
LPA Response	Support welcomed. The High level Assessment of the Candidates Sites only considered fundamental constraints – it did not assess ecological and landscape considerations. Such matters were assessed as part of the stage 3a Candidate Site Assessment process. Candidate Sites that progressed from the High Level Assessment, have been subject to a detailed assessment through the stage 3a candidate site assessment process, which includes consideration of sites' impact on landscape character. Policy S15 as well as landscape policies LC1-LC5 seeks to ensure development proposals do not have an unacceptable impact on the surrounding landscape character.
LPA Recommendation	No significant changes required, the strategic policy reference has changed to S5.
Suggests word change	• Not all measures will be applicable, feasible or viable for each development proposal. Respectfully suggest that the phrasing 'will include' is substituted with 'may include subject to site-specific considerations' [Redrow Homes Limited, Edenstone, Barwood]. • Wording of the policy should be amended to add 'take of reasonable steps' ahead of maintain, protect, and enhance. This would be consistent with the wording and messaging of PPW [Richborough Estates]. • Add reference to maintaining and enhancing public open space, amenity land and heritage assets to the Policy [Cllr Louise Brown].
LPA Response	It is not considered appropriate or necessary to change the policy wording as suggested. One of the RLDP's key objective is to 'protect, enhance and manage the resilience of Monmouthshire's natural environment, biodiversity and ecosystems and the connectivity between them', and in view of national policy PPW12 Chapter 6 and in order to meet the Section 6 Duty of the Environment (Wales) Act 2016 ,it is considered necessary for the policy to include strong and robust policy wording. Protection of and maintenance of open space and amenity land is covered under policies CI3 and CI4. Heritage assets has been added to the wording of Strategic Policy S5.
LPA Recommendation	No significant changes required, the strategic policy reference has changed to S5.
Biodiversity Gain	• Point (ii) should include reference to biodiversity gain in line with PPW11 [Melin Homes, Llanarth Estates, Tirion Homes, Candlestone Homes, Sero Homes, Sero, Private Individual x2].
LPA Response	The requirement for biodiversity gain/net benefit has been included in Development Management Policy NR1 Nature Recovery and Geodivseristy. Reference to net biodiversity gain is also made in the supporting text to Strategic Policy S5.
LPA Recommendation	No significant changes required, the strategic policy reference has changed to S5.

SuDS	• Fully endorse this policy in particular criterion vi) the incorporation of SuDS schemes into green infrastructure has multiple benefits from a water resource and environmental perspective [Dwr Cymru/Welsh Water].
LPA Response	Support welcomed.
LPA Recommendation	No significant changes required, the strategic policy reference has changed to S5.
Landscape	• We support part (i) of S17 from a landscape perspective. The policy wording appears to distinguish landscapes as a subset of Green Infrastructure. We advise that landscapes are considerably broader than Green Infrastructure. Green Infrastructure doesn't include entire landscapes or include all elements of landscape, for example excluding agricultural land, buildings and structures. These distinctions should be acknowledged in the justification [NRW].
LPA Response	Comment noted. Specific policies in relation to the protection and enhancement of landscape character are set out in Development Management Policies LC1-LC5.
LPA Recommendation	No significant changes required, the strategic policy reference has changed to S5.
Ecosystem resilience	• Ecosystem resilience in the county of Monmouthshire is comparatively poor (evidenced by ecosystem mapping). We suggest this fact be incorporated into the supporting text to reflect the current 'health' of green infrastructure access the county and this needs to be improved/strengthened [NRW].
LPA Response	Comment noted. Development Management Policies GI1 Green Infrastructure and NR1 Nature Recovery includes further text to enhance and strengthen GI and ecological resilience across Monmouthshire.
LPA Recommendation	No significant changes required, the strategic policy reference has changed to S5.
Water environment	• Consider that although part (vi) of the policy wording broadly covers the need for new development to maintain, protect and enhance GI through water resource management we do not consider the policy justification has conveyed the significance and importance of the water environment in this context. It is limited to the current challenge of the phosphorus issue [NRW]. • The water environment within Monmouthshire is under significant pressure. Our Water Quality Monitoring data suggests that numerous waterbodies are failing both the Water Framework Directive (WFD) targets and Habitats Directive (HD) targets. The RLDP has a role to play to prevent further deterioration as a result of development. While phosphorus levels in the SAC rivers area key concern this is far from the only water quality issues. It is recommended that this section be revised to include specific reference to the Water Environment and the importance it has within the context of S17 [NRW]. • In terms of what new developments should be seeking from a water environment perspective the RLDP should inform prospective developers that where there are watercourses running through sites solutions should be found to leave the watercourse to run its natural course. New culverts, dams or impoundments should be avoided to maintain river connectivity. Where there are existing impoundments solutions should be sought to have these removed - this might be better located in a Development Management Policy [NRW].

LPA Response	Comment noted. Development Management Policies NR3 Protection of Water Sources and the Water Environment includes further text to convey the importance of protecting the water environment. A note within the policy text of NR3 has also been included in relation to leaving watercourses to run their natural courses.
LPA Recommendation	No significant changes required, the strategic policy reference has changed to S5.
Canals	• Pleased to note canals are specifically recognised as GI although document would be improved if the Monmouthshire & Brecon Canal was specifically recognised [The Canal and River Trust].
LPA Response	Comment noted and canals are referred to within the supporting text to Policy GI1 and Policy NR3. It has not been possible to specifically reference the Monmouthshire and Brecon Canal in need to keep the RLDP succinct, however GI SPG is to be developed and specific reference could be made within this supporting guidance.
LPA Recommendation	No change required.
Dark skies/light pollution	• Suggest policies relating to Tranquillity and Dark skies/light pollution are developed alongside S17 through a Development Management policy [NRW].
LPA Response	Comment noted. The RLDP includes Development Management Policy LC5 Dark skies and lighting which refers to light pollution and protecting dark skies tranquillity.
LPA Recommendation	No significant changes required, policy reference has changed to S5.
Green Belt/Green Wedge	• Disappointing there is not mention of creating a green belt/wedge when allocating candidate sites [Abergavenny Town Council]. • Policy support advice that assessments such as Green Belt/ Green Wedge designation should be done early in the process [Private Individual x1]. • No reference to The ofwhich should have been published alongside the Preferred Strategy to inform where the proposed level of growth will go [Private Individual x1].
LPA Response	A Green Wedge Assessment has been undertaken to inform the RLDP process.
LPA Recommendation	No significant changes required, policy reference has changed to S5.
Other	• Disappointing not to see a comparable strategic policy for maintaining protecting and enhancing the built fabric of the County especially the heritage features [Abergavenny & District Civic Society]. • Grove Farm care villages can be delivered in line with S17 [Grove Farm Estates & Development]. • The Landscape Character Assessment of the preferred site in Chepstow downgrades the value of the landscape character with no explanation or reflection of previous work. Has it been influenced by the speculative developer's own assessment in 2019? [Cllr Christopher Edwards, Private Individual x1]. • Support for the policies aims are countered by statements around recognition that the whole of Monmouthshire is a rural county and therefore exceptions must be made [Private Individual x1]

	• How can Policy S17 be achieved if new housing is built on green space? [Private Individual x1].
LPA Response	Maintaining, protecting and enhancing Monmouthshire's built environment is addressed within Policy S3 - Sustainable Placemaking and High Quality Design, as well as Policy HE1 Conservation Areas. National Policy Chapter 6 of PPW and TAN24 also provide policy protection and guidance to the historic built environment. Grove Farm care village Candidate Site has not progressed through the RLDP process. The Landscape Character Sensitivity Assessment is carried out by an independent accredited Landscape consultant. Brownfield opportunities have been considered through the site selection and candidate site process, however, there are limited brownfield opportunities in Monmouthshire and therefore greenfield opportunities have had to be considered to meet our key housing and employment requirements. Policy S5 and the supporting development management policies aim to protect and enhance our natural environment and there is a requirement to provide net biodiversity gain through mitigation and compensation of proposed developments, as set out in National Policy.
LPA Recommendation	No significant changes required, policy reference has changed to S5.

Question 23 – Do you agree with the recommendations with regard to the existing Adopted LDP Development Management Policies?

39 organisations or members of the public submitted a response to question 23.

There was general support overall for the existing Development Management Policies. A number of organisations and members of the public recommended changes to the existing wording.

Key Theme	Summary of Points Raised
General support for existing DM policies	• Provide general support to the existing LDP policies and review recommendations [Abergavenny Town Council (1056.R25), Home Builders Federation, BB3 Limited, Leathdunn Ltd, Johnsey Estates UK, Manor Farm Partnership, Johnsey Estates 2020 Ltd, The Chepstow Society, Vistry Group, The Coldbrook Estate, Private individuals x 5].
LPA Response	Support noted.
LPA Recommendation	Updated Development Management policies are included in the Deposit Plan as a result of new evidence, guidance and local factors that have emerged as the Plan has progressed.
Housing	• State H1 should make it clear that Abergavenny and Llanfoist are classified as a single settlement [Grove Farm Estates & Development]. • Refer to Policy H3 (Residential development in Minor Villages) note any rewording of this policy must not undermine the requirement that minor infill can only take place between existing dwellings as opposed to existing buildings [Raglan Community Council]. • Supports retention of Policy H7 and the intention to reflect PPW guidance on Affordable Housing Exception sites within or adjoining all settlement boundaries. Suggest it is important to review existing settlement boundaries to ensure all settlements include an appropriate boundary [Monmouthshire Housing Association & Private individuals x 2].
LPA Response	Llanfoist is noted as forming part of the Primary Settlement of Abergavenny throughout the RLDP, with further details set out in the Sustainable Settlements Appraisal.

	With regards to the appropriateness of infilling between existing buildings, there may instances where infilling between existing buildings that are not dwellings will be acceptable. Support for the affordable housing exception site policy approach is welcomed. Settlement boundaries have been reviewed as part of the evidence base.
LPA Recommendation	No change required.
Enterprise and Employment	• Support Policy E2 (Non-allocated employment sites) noting this facilitates employment development outside of the urban settlements when it is justified and fully meet the criteria [Private individual x 1]. • Suggest the omission of Policy E3 (Working from Home) may be unwise at a time this may be increasing, dealing with complaints may require clarity of rights and policy, should be worded to cover all business use, including that for a business based elsewhere [Abergavenny & District Society]. • Refers to E3 (Working from Home) suggesting it is useful to continue with this policy as it makes clear that this is permitted provided there is no adverse impact on the local amenity and/or character of the area. Suggest also adding 'and no adverse impact on neighbourhood parking in the area' [Cllr Louise Brown]. • Refer to Policy E3 (Working from Home) noting this will become an increasing trend, but is only available with the right infrastructure, suggest the Council should have a policy on this provision, with goals for broadband speed to all communities and encouraging broadband provision within the County [Private individual x 1].
LPA Response	Support for Policy E2 – Non-Allocated Employment Sites welcomed. A specific policy on working from home is not considered necessary and is sufficiently covered by other policies.
LPA Recommendation	No change required.
Rural Economy	• State RE3 should be renamed to 'Farm Business Diversification [Abergavenny & District Society]. • Refer to Policy RE5 (Intensive livestock/Free range poultry units) noting policy should be amended to take account of the potential effects of inappropriately located livestock development has on air quality. Suggest part d) could be amended to state 'the unit is located, designed, and uses appropriate technology, to minimise the nuisance of smell, noise and air and water pollution' [Natural Resources Wales].
LPA Response	The policy title 'Agricultural Diversification' given to policy RE3 is consistent with national guidance on this policy area. Agree with the suggestion to include reference to air pollution in policy RE5.
LPA Recommendation	No change required in relation to policy RE3. Add reference to air pollution in policy RE5 – Intensive Livestock/Free Range Poultry Units.
Retail	• Suggest RET1 and RET2 policies need to be consistent with Placemaking Strategies proposed under S10 [Abergavenny Town Council and Abergavenny & District Society].
LPA Response	Comments noted. The need to sustain and enhance the County's towns and local centres as vibrant and attractive centres, serving the needs of their population and those of their surrounding hinterlands, is a key objective of the RLDP. The policies in the Retail and Commercial Centres chapter reflect this ambition.
LPA Recommendation	No change required.

Landscape	• Suggest LC6 (Green Wedges) should be fully adopted and incorporated in the RLDP to meet S17 [Abergavenny Town Council]. • State LC6 (Green Wedges) should be strengthened by adding 'and to prevent urban sprawl and to protect and enhance the distinct character and identity of the villages and towns' [Cllr Louise Brown]. • Suggests any changes to LC6 (Green Wedges) should be consulted upon before being incorporated into the Plan [Private Individual x 1]. • Review of LC6 (Green Wedges) is supported [Taylor Wimpey].
LPA Response	Comments noted. The Green Wedge policy has been included within the RLDP Deposit Plan with relevant amendments and is now referenced as Policy GW1.The Policy sets out the green wedge designations in the county. The definition and purposes of green wedges is set out in PPW12 and, therefore, it is not necessary to repeat this in the policy. Green wedge designations will be consulted upon as part of the Deposit Plan consultation. A Green Wedge Assessment has been undertaken to inform the RLDP process.
LPA Recommendation	Policy GW1 (formerly LC6) has been amended to reflect the findings of the Green Wedge Assessment.
Renewable Energy & Energy Efficiency	• State SD1 and SD2 need greater commitment to deliver this policy in the RLDP to meet S17 [Abergavenny Town Council].
LPA Response	The relationship between renewable energy (formerly SD1) and sustainable construction (formerly SD2) with green infrastructure and nature conservation objectives is fully recognised and reflected in the RLDP policy framework. Section 10 of the Deposit RLDP provides an updated policy framework in relation to Climate Change requirements including a requirement for new homes to be net zero, renewable energy generation targets and assessment criteria for renewable energy proposals.
LPA Recommendation	Refer to Section 10 of the Deposit RLDP for the updated climate change policy framework.
Flooding	• No objection to the deletion of SD3 and to rely on national policy. State there is opportunity to include locally specific policy if found necessary through the SFCA work within the broader spatial policy for climate change (S4) [Natural Resources Wales]. • Suggest the policy should be retained due to the importance of preventing local flooding as a reminder to its importance both locally and nationally through TAN15. Useful to have a policy that clarifies highly vulnerable development will not be permitted [Cllr Louise Brown]. • Suggest policy is retained due to climate change and likeliness of more flooding, also to ensure local considerations aren't lost by deleting [Private individuals x 3]
LPA Response	The importance of preventing flooding is recognised within the RLDP, however, national policy contained within PPW12 and TAN 15 set out detailed national policy on development and flood risk and therefore do not need to be repeated in the Plan. Policy S4 – Climate Change, does however, require development to address the causes of, and adapt to the impacts of climate change including avoiding locating development in areas at risk of flooding and the incorporation of Sustainable Drainage Systems (SuDs).
LPA Recommendation	No change required.
Movement	• Supports the retention of MV1 (proposed developments and highway considerations) and the intention to update it in line with PPW refer to text in PPW11 which states 'Planning authorities must support schemes which keep parking levels down, especially off-street parking, when well designed'

	suggesting this statement should be considered in the context in any revised wording of Policy MV1 [Monmouthshire Housing Association, Edenstone and Private individuals x 2]. • Note MV4 (cycleways) relates to leisure cycling and should cover all aspects of Active Travel [Abergavenny Town Council & Abergavenny & District Society]. • Agree with recommendations set out for MV6 (Canals and redundant rail routes) that the existing policy has little benefit due to its limited scope. However, wish to advocate the need for an alternative strong canal related policy which recognises the multi-functionality of the canal and its wide-ranging benefits, note the existing policy is limited to considering sustainable transport alone. Provide detail of guiding principles for any new policy and suggested supporting text [The Canal & River Trust (Glandwr Cymru]. • Notes MV9 (The Road Hierarchy) should be retained due to its importance as it makes important points about traffic congestion, refers to frontages on these roads [Cllr Louise Brown].
LPA Response	Comments noted. Policy MV1 has been included in the Deposit Plan with some amendments – the new policy reference is ST1 Sustainable Transport Proposals. Policy ST1 has been updated in accordance with PPW12 and the policy supports car-free development in town centre locations where practicable. MV4 has been removed as cycling provision and connections is covered with Policy S13 and ST1 MV6 has been amended to ST6 Protection of Redundant Routes where the focus is on re-purposing such routes for sustainable transport connections. Protection of canals and its wide-ranging benefits is covered in Policy S5 Green Infrastructure, Landscape and Nature Recovery and NR3 Protection of Water Sources and the Water Environment. MV9 has been retained and updated. The new reference for the policy is ST2 Highway hierarchy.
LPA Recommendation	Policies amended as set out above.
Historic Environment	• Refer to reference on footnote on page 147, highlight the Historic Environment (Wales) Act that has been introduced to the Senedd is a consolidation act and will contain no new policies or legislation [Cadw]. • Suggest HE1 should be strengthened to align better with PPW11 paragraph 6.1.15 with a strong presumption against the granting of permission for developments which damage the character and appearance of a conservation area or its setting to an unacceptable level [Abergavenny & District Society].
LPA Response	Comments noted, the detailed policies within the RLDP in the historic environment section cross reference national guidance and relevant legislation including the Historic Environment (Wales) Act, PPW12 and TAN24: The Historic Environment. Minor amendments have been made to both the policies and supporting text.
LPA Recommendation	The policies set out within the Historic Environment section have been updated to reflect updated National Policy , however none of the changes are considered to be significant.
Community Facilities	• Supports the retention of policy CRF2 but considers text should be amended to ensure open space is assessed and provided in the context of existing provision: 'Proposals for new residential development should provide appropriate amounts of outdoor recreation and public open space in accordance with the above standards where required. Any provision should be well related to the housing development that it is intended to serve, however the exact form and type will be determined having regard to the nature and size of the development proposed' [Monmouthshire Housing Association, Edenstone and Private individuals x 2].

LPA Response	CRF2 (now referenced as CI2 in the Deposit Plan) has been updated to be in accordance with the latest Fields in Trust (FIT) standards. The Council has undertaken an Open Space Audit. This assesses the quantity of formal and informal public open space of existing provision within the County and compares this provision with the benchmark standards endorsed by FIT. The Open Space audit can be used as a means of justifying the provision of new recreational facilities and/or remedying local deficiencies in provision. It can also be used as a means of safeguarding and enhancing existing facilities as appropriate, as well providing the evidence and justification in seeking S106 financial obligations from developers where new housing development increases local recreational need.
LPA Recommendation	Policy CI2 (formerly Policy CRF2) updated to reflect FIT standards.
Green Infrastructure	• Suggest it is likely GI1 will need to be amended to align with S17 and to ensure it delivers on the RLDP objectives regarding GI [Natural Resources Wales].
LPA Response	Comments noted. Policy GI1 has been updated to align with S17 (Policy reference changed to S5 in the Deposit Plan).
LPA Recommendation	Policy GI1 updated to align with Strategic Policy S5 and RLDP objectives.
Waste	• Refer to there no longer being a tip in Usk and people having to drive to Abergavenny or Monmouth. Suggest not at a stage where the policy should be deleted as it is an on-going issue [Private individual x 1].
LPA Response	The principles of Adopted LDP policy W2 – Waste Recovery Facilities: Household, are considered relevant and necessary, but are considered to be adequately covered by other RLDP policies.
LPA Recommendation	No change required.
Other	• Suggest there isn't enough detail in the table in order to provide comment as no supporting documentation [Private individual x 2].
LPA Response	Comments noted, the commentary provides a summary of the findings of officer working groups, however it is noted that this response is indicative and that changes would be made as new evidence, guidance or local factors emerge as the Plan progresses. As a consequence. the policies have all been reassessed in the formulation of the Deposit Plan.
LPA Recommendation	No change required.

Question 24 – Do you have any other comments on the Preferred Strategy?

42 organisations or members of the public submitted a response to Question 24 – 'Any other comments on the Preferred Strategy?
The key themes raised are set out below:

Key Theme	Summary of Points Raised
Archaeology/ Historic Guidance	• The Preferred Strategy recognises the rich heritage of the area and type of historic assets designated with statutory protection. Refers to national guidance in relation to the historic environment and advisory role of GGAT [GGAT]. • GGAT should be consulted at part of Candidate Site consultation review [CADW].
LPA Response	Comments noted. GGAT have been consulted on all Candidate Sites that remained in the process (Stage 3A) following the high level sift of Candidate Sites. GGAT will continue to be consulted throughout the RLDP process.
LPA Recommendation	No change required.
Housing mix	• The suggestion that the Council are going to dictate private market mix is not supported [Redrow].
LPA Response	Comment noted. The housing mix policy included in the plan is in place to encourage a better mix of house types, tenure and size to help address demographic and affordability challenges facing the County. The policy does not dictate the private market mix but does point to the priority for small to medium size homes to help address these challenges.
LPA Recommendation	No change required.
Net zero carbon ready	• The Council need to define the term 'net zero carbon ready' homes [Redrow].
LPA Response	In October 2023 a report of post consultation Preferred Strategy changes was agreed by Council. This included a change to the policy requirement for the environmental credentials of the new homes to be 'net zero carbon' rather than 'net zero carbon ready'. The Deposit Plan includes policy NZ1 which sets out the definition and the Council's standards for delivering Net Zero Carbon Homes'.
LPA Recommendation	Term 'Net Zero Carbon' homes is defined with Policy NZ1.
Green Belt/ Green Wedge	• Disappointed in lack of inclusion for Green Wedge provision at this stage [Abergavenny Town Council, SOUL] • Would have expected a strategic LDP policy dealing with both green belt/green wedges across the county. Green Wedges are strategic in terms of individual towns such as Abergavenny and should have been proposed at this stage of the Plan making process [Abergavenny &District Civic Society, SOUL]. • Green Wedge to west of Rogiet should be rolled back to allow for development [BB3 Limited, Manor Farm Partnership, Private Individual x3]. • Strongly object to the principle of a Green Belt in Monmouthshire [BB3 Limited, Manor Farm Partnership, Private Individual x3]. • Question why the Green Belt included in Future Wales is not included in the Key Diagram [Persimmon Homes East Wales]. • Vital that current Green Wedges are maintained [Private Individual x1]. • Important to preserve the Green Wedge between Shirenewton and Mynyddbach [Private Individual x1].
LPA Response	A Green Wedge Assessment has been undertaken to inform the RLDP process. The green wedge west of Rogiet has been considered as part of the Green Wedge Assessment.

	Future Wales Policy 34 advises that a Green Belt in the SE Wales region is to be designated as part of a Strategic Development Plan (SDP) for SE Wales. The Spatial Strategy has regard to Policy 34 and the indicative Green Belt boundary set out in Future Wales. Monmouthshire's primary settlements fall outside of the indicative Green Belt boundary. National planning policy allows for extensions to existing settlements within and adjoining the Green Belt of an appropriate scale having regard to the identified and longer term need for development land, the effects of development pressures in areas beyond the Green Belt, the need to minimise demand for travel, and the purpose of the overall greenbelt designation. It states that this may require land to be safeguarded and boundaries of proposed Green Belts must be carefully defined to achieve this. Potential Green Belt land is to be assessed and designated as part of a SDP for the South East Wales Region. It is not considered necessary to include the indicative Green Belt in the Key Diagram as the boundary will be informed by the SDP. The Green Wedge Assessment ensures that land has been reviewed relevantly to the updated Green Wedge purposes set out in PPW. National Policy sets out the guidance for the Green Wedge protection and expectations for some development proposals that maintain the openness of Green Wedge land. The Green Wedge between Shirenewton and Mynyddbach has been considered as part of the Green Wedge Assessment.
LPA Recommendation	Green wedges have been assessed as part of the Green Wedge Assessment, the findings of which are set out in Development Management Policy GW1.
Climate Emergency	• There is a lot in the Preferred Strategy that conflicts with the Climate and Ecological emergencies [Private Individual x1].
LPA Response	Brownfield opportunities have been considered through the site selection and candidate site process, however, given the limited brownfield opportunities in Monmouthshire, greenfield opportunities have had to be considered to meet our housing and employment requirements. There is a suite of policies in the Deposit Plan seeking to address climate and nature emergencies, including: NZ1 Net Zero Homes, CC2 Renewable Energy Allocation, CC3 Renewable Energy Generation, GI1 Green Infrastructure and NR1 Nature Recovery and Geodiversity.
LPA Recommendation	No change required.
Infrastructure	• Community facilities are currently at saturation and there is little community spirit [Private Individual x1].
LPA Response	Comments noted. The RLDP provides support through the policy framework for new and improved community facilities.
LPA Recommendation	No change required.
Green Infrastructure	• There is no cross reference to the MCC Green Infrastructure Plan [Abergavenny Town Council].
LPA Response	Policy GI1 Green Infrastructure and the supporting text cross references MCC'S GI Strategy, as well as the GI SPG.
LPA Recommendation	Cross reference in the supporting text of Policy GI1.
Water Environment/Phosphates	• Forest of Dean is also concerned with regard to phosphate issues in the River Wye Catchment area though development is not currently restricted [FODDC]. • The water quality in riverine SAC section should include details of the way in which improvements to WwTW under the AMP programmed needs to be explained as well as the decision to halt development in Monmouth [HBF].

	• Plan making process is the only opportunity to review settlement boundaries therefore critical to consider where future development can be accommodated in Monmouth once a strategic solution to phosphates can be achieved [Private Individual x1].
LPA Response	The supportive text of Policy NR3 Protection of Water Sources and the Water Environment includes an explanation of DCWW's AMP process and is also addressed in paragraphs 4.1.3 – 4.15 in the key issues of the Deposit Plan. Welsh Government's response letter to the 2022 Preferred Strategy advised that new site allocations should be made in Monmouth on the basis that sufficient certainty is provided by DCWW's planned improvements at the Monmouth Wastewater Treatment Works by 31st March 2025. Housing allocations, including a strategic site, have therefore been allocated in the Deposit Plan in Monmouth.
LPA Recommendation	The Deposit Plan has been updated to reflect the updated position that DCWW are committed to implement sewerage waste water treatment improvements. This includes allocating sites within Monmouth.
Designated Sites	• Surprised the Severn Estuary Marine Site is omitted from the Summary Preferred Document (P7). This seems to be the only international designated site not mentioned in the summary document [Gloucestershire County Council].
LPA Response	Comments noted.
LPA Recommendation	The Severn Estuary Marine Site is referenced throughout the Deposit Plan and has also been considered throughout the HRA process. Protection Policy NR2 'Severn Estuary Recreational Pressure' has been included in the plan as a result of the HRA recommendation.
Plan Delivery/ timeline	• The likely adoption date will mean the Plan will have less than 10 years 'live' [Torfaen County Borough Council]. • Should there be any further slippage to the preparation of the plan the operational life of the RLDP will be reduced even further. Consequently, we would suggest that the plan period be extended to cover an increased timescale beyond 2033 with associated amendments to the housing requirement [Edenstone].
LPA Response	Comments noted. The development plans process does not allow for the Plan period to be extended beyond 2033.
LPA Recommendation	No change required.
Collaborative working	• Will continue to work with Monmouthshire as the Plan progresses to ensure cross boundary issues are considered including growth levels, infrastructure [Torfaen County Borough Council].
LPA Response	Comments noted.
LPA Recommendation	No change required.
Suggestions	• Home Builders Federation suggest that the fact that the County is not within a growth area as defined by the National Plan should be included and explained under the constraints section. This should include an explanation of how the plan's strategy has changed from the previous strategy [HBF]. • The Strategy should include a review on how decisions have been made and if necessary, what needs to be done to improve this [Private Individual x1].
LPA Response	Welsh Government formally responded to the Preferred Strategy consultation in January 2023 with a 'green' rating and noting that "Future Wales places great emphasis on the development of National Growth Areas and the need for additional affordable housing. The Preferred Strategy is in general conformity with Policies 1, 7 and 33 of Future Wales and does not undermine the role of Cardiff, Newport and the Valleys as the main focus for growth

	and investment in the south east region, but reflects the urgent need to increase the supply of affordable housing in Monmouthshire." In this respect, the level of growth proposed has been deemed in conformity with Future Wales by Welsh Government. The Plan includes an extensive evidence base which will provides up-to -date robust evidence to support policy formulations and the information set out in the Plan. The evidence base will be available to view at Deposit consultation.
LPA Recommendation	No change required.
Candidate Sites	• Accepting Candidate Sites that would appear to fit the demographic bill would be catastrophic if they ignore the dangers of flooding, urban creep, increased traffic and overwhelming traffic [Private Individual x1]. • Would have been easier to comments on sites if details of infrastructure improvements had been provided [Private Individual x1]. • Preferred sites seem to have gone through a rigorous process that has come up with an outcome that is supported by evidence – however smaller sites need to go through the same process [Private Individual x1].
LPA Response	All Candidate Sites have been subject to detailed assessments – refer to the Candidate Sites Methodology and Candidate Sites Assessment Report fort further details. An Infrastructure Delivery Plan has been prepared to support the Deposit Plan and will be published as part of the Deposit Plan.
LPA Recommendation	No change required.
Candidate Sites for Protection	• The criteria for assessment for protection does not exist. Concerned that sites for protection are now disadvantage compared with those for development [SOUL].
LPA Response	Protection Candidate Sites submissions have been assessed via other mechanisms forming part of the RLDP evidence base, which most closely relate to the suggested reason for protection. Further details are set out in the Candidate Site Assessment Report and the RLDP evidence base.
LPA Recommendation	No changes required.
New Settlement	• Inappropriate and unsound to rule out a long-term policy intervention such as a new settlement without fully considering the benefits that it can bring [Candlestone Homes], Sero Homes, Private Individual x1]. • New settlement in the right location would provide an appropriate long-term opportunity away from existing problems, constraints, and issues. We believe it should be eminently feasible for the RLDP to 'dovetail' with an SDP and such an approach can provide the most sustainable way forward and ought to be achievable in a multi-tiered development plan process [Sero Homes, Sero Homes, Private Individual x1].
LPA Response	Paragraph 3.53 of PPW12 states that "due to their strategic nature new settlements should only be proposed as part of a joint LDP, an SDP or Future Wales. This is due to their significance and impacts extending beyond a single local authority." National Policy does therefore not allow New Settlements to be considered as part of the LDP process.
LPA Recommendation	No change required.
Chepstow	• Concerned about the lack of recognition of specific issues relating to Chepstow [The Chepstow Society].

	• In Chepstow it will fail to achieve its objectives until there is a fundamental overhaul of the Business Rate System [Private Individual x1].
LPA Response	Comments noted. The Plan's issues are considered on a county-wide basis. The Infrastructure Delivery Plan considers specific infrastructure requirements for development proposals at Chepstow. Business Rates are not within the remit of MCC.
LPA Recommendation	No change required.
Reference errors	• Should reference to Gloucestershire Council in paragraph 2.2 be GCC? [Gloucestershire County Council].
LPA Response	Comment noted.
LPA Recommendation	Reference amended accordingly.
Consultation process	• Insufficient time give to prepare response to the consultation exercise from the Raglan drop-in session to the end of the consultation [Raglan Community Council]. • Would welcome informal consultation with community groups prior to the publication of the Deposit Plan [Abergavenny &District Civic Society]. • Online system to make comments is difficult to use [Private Individual x1]. • More effort should be made in future public consultations to present information in an accessible format. The animation on webpage is excellent but hidden on webpages that require a lot of reading. Suggest public consultation in village halls and video played and explained in this setting [Private Individual x1]. • The lack of respect for public opinion from previous consultations and in respect of allocating preferred development sites demonstrates the Council is not serving the best interests of the people it is there is serve [Cllr Christopher Edwards, Private Individual x1]. • MCC doesn't want to listen to the views of the residents. Local residents have put forward hundreds of objections to development in Undy to no avail [Private Individual x1]. • There are frequent statements that information on detailed policies will not be available to the Deposit Plan. The policies cannot therefore be evaluated till the publication of the Deposit Plan [Usk Civic Society]. • Consultation documents animation and forms too complex suggesting feedback is not genuinely wanted [Private Individual x1].
LPA Response	Raglan drop in was 19th January 2023 and deadline for comments was 30th January 2023. This gave 11 days between the drop in session and deadline for comments which is considered sufficient. Furthermore there were other drop in sessions available from the 12th December, including a drop-in session on the 19th December County Hall Usk and virtual session that was recorded and available to view on the planning policy website. Noted - consideration will be given to the potential for informal consultation prior to the formal Deposit Plan consultation. Noted in relation to animation. The Easy Read is produced to try and make the key information more accessible to communities. Note feedback that consultation forms are too complex and MCC will consider ways to improve the consultation/feedback process. All comments/ representations are considered throughout the plan making process. The Deposit Plan is considered to represent the best interests of Monmouthshire's residents by providing a sustainable level of growth that addresses our local issues and objectives including the delivery of much needed affordable homes, supporting sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency. Deposit consultation will allow further comment on the strategic policies as well as the details Development Management Policies.

LPA Recommendation	Consider opportunities to improve the RLDP consultation process, as appropriate.
Other	• Contradictions between all levels of policies. We need decisive action to change the way we live and the structure of our county to help counter global warming and to protect our environment for the future. This strategy is 'more of the same' [Private Individual x1]. • Preferred Strategy contains well-meaning but vague statements with no indication of how these would be evaluated. The Deposit Plan must correct this problem [Usk Civic Society]. • I can only see that the way it has been written has been done so to provide the answers the planners wanted to hear [Private Individual x1]. • Wrong conclusions based on incomplete analysis [Private Individual x1].
LPA Response	Comments noted. The Deposit Plan sets out the growth and spatial strategy to facilitate sustainable growth in the County up to 2033, embodying the principles set out in the Community and Corporate Plan of tackling inequality, protecting our environment and adapting to a world being reshaped by climate change. The Strategy has been informed by a wide range of robust evidence and responds to a number of key challenges that have arisen during the plan preparation process. Within this context, the RLDP seeks to deliver on the Vision and Objectives and meet our core purpose of delivering sustainable and resilient communities
LPA Recommendation	No change required.

Question 25 – We would like to know your views on the effects that the proposals would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

16 organisations or members of the public submitted a response to question 25.

Key Theme	Summary of Points Raised
Commuting	• Suggest it will not be possible to improve the use of the Welsh language as the majority of new residents will commute to Bristol and Cardiff. Suggest newcomers won't be interested as there is little opportunity to speak it in the area [Cllr Louise Brown, Cllr Christopher Edwards & Private individuals x 3] • State can only observe that in-migration is not likely to add significantly to the County's Welsh speakers but that newcomers may choose to learn the language while visiting [Abergavenny & District Civic Society].
LPA Response	Comments noted. It is recognised that Monmouthshire has a relatively low proportion of population that speak, read and write Welsh compared to other Local Authorities in Wales. However, the promotion of greater opportunities for children, residents of all ages and the workforce to learn and speak Welsh is identified in the Monmouthshire Welsh Education Strategic Plan (WESP). Monmouthshire also has Welsh medium primary schools in Abergavenny, Caldicot and Monmouth (Monmouth is using a seedling school model from September 2024).

LPA Recommendation	The Plan supports the aims of the WESP and will support steps taken within proposals to safeguard and grow the use of the Welsh language.
No effect	• Suggest the proposals will have no effect on Monmouthshire and the use of the Welsh Language [Abergavenny & Crickhowell Friends of the Earth & Usk Civic Society].
LPA Response	Comment noted, the promotion of greater opportunities for children, residents of all ages and the workforce to learn and speak Welsh is identified in the Monmouthshire Welsh Education Strategic Plan (WESP). Monmouthshire has Welsh medium primary schools in Abergavenny, Caldicot and Monmouth (Monmouth is using a seedling school model from September 2024), children in new developments across the County will have access to these schools should they wish to attend a Welsh medium primary school. National planning policies provide advice regarding the consideration of Welsh language in development and will be taken into account in the determination of planning applications, where appropriate.
LPA Recommendation	The Plan supports the aims of the WESP and will support steps taken within proposals to safeguard and grow the use of the Welsh language.
Not relevant	• Suggest Welsh Language is not relevant to planning policy [Private individual x 1]. • Notes while the Welsh Language has importance in the historic language heartlands and Cardiff it can be a divisive issue in border areas, suggest it is a Welsh policy that doesn't fit to some local areas/Counties [Private individual x 1]
LPA Response	Comments noted. National guidance refers to the importance of the consideration of the needs and interests of the Welsh language in sustainable placemaking in Wales. The Plan reflects this approach.
LPA Recommendation	The Plan supports the aims of national Policy and the Monmouthshire Welsh Education Strategic Plan (WESP) and will support steps taken within proposals to safeguard and grow the use of the Welsh language.
Co-operative and community led housing	• Refer to co-operative and community-led housing noting this has the potential to make a difference as part of the solution to the housing crisis in Wales. Suggest community-led models support the housing needs of a local community, ensuring there is sufficient affordable housing available, which in-turn protects the survival of the Welsh language [Cwmpas].
LPA Response	Comments noted, while no allocations are proposed specifically for co-operative and community-led housing these will be considered on a case-by-case basis through planning applications.
LPA Recommendation	No change required.
Other	• Supports development of affordable housing sites to encourage younger demographics benefitting from Welsh Education by attending the local Welsh medium primary school to stay in the area. Suggest this helps to protect and enhance the Welsh speaking demographic to remain and grow in Abergavenny [Abergavenny Town Council]. • Note the use of Welsh language must start in the schools and progress from there, leadership should come from Welsh Government [Private individual x 1]. • Suggest family literacy classes should be offered to make learning Welsh together fun [Private individual x 1]. • State candidate sites must have adequate provision for education in Welsh Language medium [Private individual x 1].

LPA Response	Comments noted, the promotion of greater opportunities for children, residents of all ages and the workforce to learn and speak Welsh is identified in the Monmouthshire Welsh Education Strategic Plan (WESP). Monmouthshire has Welsh medium primary schools in Abergavenny, Caldicot and Monmouth (Monmouth is using a seedling school model from September 2024), children in new developments across the County will have access to these schools should they wish to attend a Welsh medium primary school. National planning policies provide advice regarding the consideration of Welsh language in development and will be taken into account in the determination of planning applications, where appropriate.
LPA Recommendation	The Plan supports the aims of the WESP and will support steps taken within proposals to safeguard and grow the use of the Welsh language.
Site promotion	• Refer to proposal for a senior neighbourhood noting there is an opportunity to incorporate the Welsh Language into signage, social events, and lessons. Suggest it offers an opportunity to allow local, Welsh speaking people to remain in their existing communities and brings opportunity for vacated housing stock to enter the market which could encourage younger residents to stay in the area bringing cultural vibrancy to Abergavenny and Llanfoist [Grove Farm Estates & Development].
LPA Response	Candidate site submissions have been considered as part of the candidate site assessment. Individual site recommendations can be viewed in the Candidate Site Assessment Report.
LPA Recommendation	No change required.

Question 26 – Please also explain how you believe the proposals could be improved so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language?

4 organisations or members of the public submitted a response to question 26.

Key Theme	Summary of Points Raised
Proximity to England	• State proposals cannot improve opportunities to increase the use of Welsh language in Monmouthshire as it is too close to England [Private individual x 1].
LPA Response	Comments noted. The promotion of greater opportunities for children, residents of all ages and the workforce to learn and speak Welsh is identified in the Monmouthshire Welsh Education Strategic Plan (WESP). Monmouthshire has Welsh medium primary schools in Abergavenny, Caldicot and Monmouth (Monmouth is using a seedling school model from September 2024), children in new developments across the County will have access to these schools should they wish to attend a Welsh medium primary school. National planning policies provide advice regarding the consideration of Welsh language in development and will be taken into account in the determination of planning applications, where appropriate.
LPA Recommendation	The Plan supports the aims of the WESP and will support steps taken within proposals to safeguard and grow the use of the Welsh language.
Cymraeg 2050, Welsh Language	• Consideration should be given on how the RLDP can contribute to meeting the vision of the Welsh Language Measure and aims of Cymraeg 2050 as the new plan is formed [Welsh Language Commissioner (1341.R1)].

Measure and Strategy	• The Council should consider its Welsh Education Strategic Plan (WESP) for 2022- 2032 and further the objectives of the WESP. Consideration should also be given to the Welsh Language Strategy for 2022- 2027 and explain how it will contribute to meeting the strategy's target for increasing the number of Welsh speakers in the area by 10% [Welsh Language Commissioner].
LPA Response	Comments noted, the promotion of greater opportunities for children, residents of all ages and the workforce to learn and speak Welsh is identified in the Monmouthshire Welsh Education Strategic Plan (WESP). Monmouthshire has Welsh medium primary schools in Abergavenny, Caldicot and Monmouth (Monmouth is using a seedling school model from September 2024), children in new developments across the County will have access to these schools should they wish to attend a Welsh medium primary school. Monmouthshire does not currently have any areas with a notable concentration of Welsh speakers. Subsequently, it is not considered necessary for the RLDP to contain a specific policy to address the Welsh language. National planning policies provide advice regarding the consideration of Welsh language in development and will be taken into account in the determination of planning applications, where appropriate.
LPA Recommendation	The Plan supports the aims of the WESP and will support steps taken within proposals to safeguard and grow the use of the Welsh language.
Welsh Language Impact Assessment	• Torfaen County Borough Council are undertaking a Welsh Language Impact Assessment for their RLDP noting a major component is the promotion of Welsh medium education. Note the Welsh medium pupils in the north of Monmouthshire attend Ysgol Gymraeg Gwynllyw in Pontypool. Would like a discussion on how the proposed levels of housing growth in Monmouthshire impact upon this school [Torfaen County Borough Council].
LPA Response	Comment noted, it is recognised that there is an absence of a Welsh Medium Secondary School within the Monmouthshire area and that children accessing Welsh-medium secondary provision travel to Ysgol Gyfun Gwynllw in Torfaen County Borough Council area and Ysgol Gyfun Gwent Is Coed in Newport City Council area. This provision is delivered through partnership agreements with Torfaen County Borough Council and Newport City Council. Monmouthshire provides free school transport for children attending these schools. The Integrated Sustainability Appraisal Report includes a Welsh Impact Assessment for the Monmouthshire area.
LPA Recommendation	Continue to work with Torfaen County Council and Newport City Council to ensure there are no barriers for children in Monmouthshire attending Welsh medium secondary schools.
Site promotion	Refer to proposal for a senior neighbourhood noting there is an opportunity to incorporate the Welsh Language into signage, social events, and lessons. Suggest it offers an opportunity to allow local, Welsh speaking people to remain in their existing communities and brings opportunity for vacated housing stock to enter the market which could encourage younger residents to stay in the area bringing cultural vibrancy to Abergavenny and Llanfoist [Grove Farm Estates & Development].
LPA Response	Candidate site submissions have been considered as part of the candidate site assessment. Individual site recommendations can be viewed in the Candidate Site Assessment Report.
LPA Recommendation	No change required

Question 27 – Do you have any comments on the Initial Integrated Sustainability Appraisal Report?

21 organisations or members of the public submitted a response to question 27.

Comments were made on some of the individual themes but primarily related to the appraisal of sites, in both a supportive way and by way of comparison against other sites.	
Key Theme	**Summary of Points Raised**
Housing	• Support ISA's findings relating to strengths of apportioning housing to secondary settlements, helping to meet local housing need and ensuring benefits of growth such as provision of new community infrastructure is not just directed to highest tier settlements [Johnsey Estates 2020 Ltd].
LPA Response	Support noted.
LPA Recommendation	No change required.
Affordable housing	• Support the findings in that Monmouthshire is largely a rural plan area and in this context many of the smaller settlements are unlikely to support walking and cycling access to services. Despite this it is important that such settlements receive the benefits of modest growth to sustain their vitality. Also agree that despite rural isolation it is key that some growth is directed to the rural settlements [Llanover Estates, Leathdunn Ltd & The Coldbrook Estate].
LPA Response	Comments noted.
LPA Recommendation	No change required.
Economy and employment	• Agree with the findings that the provision of employment land will have significant long term positive effects, however, suggest the ISA overlooks the function of rural settlements, particularly in light of the change in working practices which have arisen due to Covid-19. State the Deposit Plan should recognise the value of rural and main rural settlements in providing employment opportunities close to residents to reduce the need to commute out [Llanover Estates and Leathdunn Ltd]. • Suggest the economic development assessment is inadequate as it gives no basis on which future development can be judged likely to happen [Private individual x 1]
LPA Response	Comments noted. The ISA has been undertaken by AECOM and follows the relevant regulations appropriate for the different plan stages. An ISA of the Deposit Plan and its detailed allocations and polices has also be undertaken. This includes assessment of Policy RE1 relating to Secondary and Main Rural Settlements Employment Exception sites.
LPA Recommendation	Comments on Policy RE1 have been considered in the production of the Deposit ISA.
Climate change	• Would welcome greater emphasis on promoting net zero carbon targets for any new development, state promotion of schemes to encourage energy self-sufficiency through wider provision of renewable sources would make a significant contribution to a sustainable future [Abergavenny Town Council]. • Disappointed that the strategy is not expected to have any significant effect on climate change given the amount of commuting, energy efficiency in the use of buildings, energy used in construction and provision of infrastructure [Abergavenny & District Civic Society].

LPA Response	This comment does not relate specifically to the ISA. The Deposit Plan sets out a detailed policy framework, including in relation to climate change, and is supported by a robust and comprehensive evidence base. With regards to significant effects being recognised in the ISA, the ISA recognises a continuation of baseline trends (such as high levels of commuting) rather than a significant deviation from the baseline and thus significant effects.
LPA Recommendation	Refer to the Deposit Plan and supporting evidence base for further information.
Historic Environment	• The recognition of the value and importance of the Historic Environment is noted. Assessed against existing policies the Historic Environment theme in the ISA growth options is recognised largely as being uncertain and dependent on detail, even in the delivery of strategic sites [Glamorgan Gwent Archaeological Trust].
LPA Response	Comment noted. The assessment of alternatives is essentially a 'policy-off' assessment, judging likely effects in relation to the existing baseline at a strategic level. The likely significance of effects is concluded within Part 2 of the ISA, which assesses the preferred strategy as a whole recognising precise site allocations and supporting policy mitigation. Inevitably though, effects in relation to the historic environment are often dependent upon detailed design and layout proposals at sites, detail which is unknown at the strategic scale of assessment.
LPA Recommendation	No change required.
Public transport	• Suggest references to bus services should be treated with caution as they are particularly liable to change [Abergavenny & District Civic Society].
LPA Response	Comment noted.
LPA Recommendation	No change required.
Welsh Language	• Reference should also be made to the Welsh language policy making standards which place a duty on local authorities to consider the effect of policy on the Welsh language. Draw attention to the Welsh Language Commissioner's advice document 'Policy Making Standards: Creating opportunities for persons to use the Welsh Language and treating the Welsh language no less favourably than the English language' [Welsh Language Commissioner]. • Refer to paragraph 9.157 stating the statement creates ambiguity about the Council's objective to support and safeguard the Welsh language suggesting it should elaborate on this in the RLDP [Welsh Language Commissioner].
LPA Response	Comments noted, a Welsh Language Impact Assessment is incorporated into the ISA which considers the likely effects of the Plan on the use of the Welsh language. In accordance with Welsh Government TAN20: planning and the Welsh Language a statement of how this has been considered and addressed is included in the ISA of the Deposit Plan. In addition to this the Deposit Plan contains a section on the Welsh Language however, there is not a specific policy. Monmouthshire does not currently have any areas with a notable concentration of Welsh speakers. Subsequently, it is not considered necessary for the RLDP to contain a specific policy to address the Welsh language. National planning policies provide advice regarding the consideration of Welsh language in development and will be taken into account in the determination of planning applications, where appropriate.
LPA Recommendation	The Plan will support steps taken within proposals to safeguard and grow the use of the Welsh language.

Agricultural Land	• Suggests the ISA does not address the national strategy to steer development away from Monmouthshire as it is a less sustainable location and will cause environment detriment [Cllr Christopher Edwards & Private individual x 1].
LPA Response	Comment noted. All options included within the ISA must be considered to be reasonable. A no growth option is not considered to be a reasonable option as it would not meet Monmouthshire's core purpose of building sustainable and resilient communities nor would it meet the RLDP objectives.
LPA Recommendation	No change required.
Green Belt	• State the last ISA argued for development in the north of the County due to Green Belt in the south of the County, state nothing has changed other than phosphates [Cllr Louise Brown].
LPA Response	Comment noted, the Preferred Strategy (2022) proposed no new site allocations in Monmouth, or within the upper River Wye catchment north of Bigsweir Bridge and also assumed no existing planning permissions or small/windfall sites could come forward. This approach was taken due to the lack of an identified strategic solution to the treatment of phosphates at the Monmouth Wastewater Treatment Works (WwTW) within the Plan period. Welsh Government's response letter to the 2022 Preferred Strategy advised that new site allocations should be made in Monmouth on the basis that sufficient certainty is provided by DCWW's planned improvements at the Monmouth Wastewater Treatment Works by 31st March 2025. Following Welsh Government's confidence in the removal of this constraint, Council agreed in October 2023 to the identification of a strategic site in Monmouth as well as including allowances towards windfall and infill allowances and existing commitments already with planning permission. The GB will be designated via a Strategic Development Plan for SE Wales in accordance with Future Wales. The spatial strategy has regard to Policy 34 and the indicative Green Belt boundary set out in Future Wales. Monmouthshire's primary settlements fall outside of the indicative Green Belt boundary. National planning policy allows for extensions to existing settlements within and adjoining the Green Belt of appropriate scale having regard to the identified and longer-term need for development land, the effects of development pressures in areas beyond Green Belt, the need to minimise demand travel, and the purpose of the overall greenbelt designation. It states that this may require land to be safeguarded and boundaries of proposed Green Belts must be carefully defined to achieve this.
LPA Recommendation	No change required.
Site specific - Abergavenny	• Question reference to Abergavenny as being one of the most self-sufficient settlements in terms of employment given the health service changes in the area [Abergavenny & District Civic Society]. • Suggest the appraisal of Abergavenny East is generally fair. Note the importance of an active travel route crossing the A465 and the railway is required and must be all weather [Abergavenny & District Civic Society]. • Support recognition of the significance of the role of Abergavenny as a Primary Settlement to drive growth and investment in the County and as a sustainable location to focus growth [Johnsey Estates UK & The Coldbrook Estate].
LPA Response	Comments noted.
LPA Recommendation	An ISA of the Deposit Plan and its detailed allocations and polices has been undertaken. This includes assessment of proposed site allocation policies in Abergavenny.

Site specific – Caldicot	• Suggests the assessment is contradictory in relation to town centre improvement as it states positive effects will be delivered through the proposed retail and leisure uses, suggests this will be detrimental to Caldicot Town Centre and will draw away trade [Private individual x 1]. • Concern the transport theme doesn't recognise limitations in public transport in the area. Refers to the appraisal of Options 1 and 2 querying no significant impact on the local road network from Chepstow and Severnside developments, particularly given the ARUP Chepstow Transport Study suggests do nothing is not an option [Private individual x 1]. • Suggests the biodiversity assessment looks at the bare minimum legal compliance with HRA and does not consider the impact of recreational use at nearby sites such as Black Rock and the Nedern [Private individual x 1]. • Suggests placemaking does not consider impacts on existing settlements such as Portskewett and Crick, which will likely be negative [Private individual x 1].
LPA Response	Comments noted and considered in the Deposit ISA. A Habitats Regulations Assessment has been produced for the Deposit RLDP, this includes assessment of proposed site allocation policies.
LPA Recommendation	An ISA of the Deposit Plan and its detailed allocations and polices has been undertaken. This includes assessment of site allocation policies in Caldicot and the wider Severnside area.
Site specific - Chepstow	• Notes the assessment of the strategic growth areas around Chepstow returns option E as the favoured site, suggests the Council do not provide explanation of why this hasn't been selected [Cllr Christopher Edwards & Private individual x 1]. • Suggest the times quoted for walking routes do not consider topography and are therefore misleading [Cllr Christopher Edwards & Private individual x 1]. • The Forest of Dean Local Plan is referred to as offering measures which could mitigate the increase in congestion in Chepstow, suggest this is speculative and not founded on positive action being taken by Governments or Council's either side of the border [Cllr Christopher Edwards & Private individual x 1]. • State there is no mention in the Health and Wellbeing section of the illegal levels of air pollution in Chepstow which is detrimental to health and wellbeing of residents [Cllr Christopher Edwards & Private individual x 1]. • Refers to the Historic Environment assessment which notes the Chepstow site is 300m from the Bishop Barnet's Wood Camp Scheduled Ancient Monument state this should read 30m and therefore sensitivity is greater than described [Private individual x 1].
LPA Response	Comments noted. A response from the Council to the alternatives assessment is provided in Chapter 7 of the ISA Report. The methodology for calculating walking routes is described within the assessment, as a strategic assessment the outcomes are treated as broad indicators. The ISA has considered areas where air quality issues have been formally noted with the declaration of an Air Quality Management Area. An ISA of the Deposit Plan and its detailed allocations and polices has been undertaken. This includes assessment of site allocation policies in Chepstow. Option D (Bayfield) has not progressed to the Deposit Plan. In October 2023 a report of post consultation Preferred Strategy changes were agreed by Council, Option E Land at Mounton Road was included in its place
LPA Recommendation	No change required.
Area specific - Monmouth	• Support the ISA findings that recognise the significance of Monmouth as a Primary Settlement [Vistry Group & Private individual x 1].

LPA Response	Comments noted. An ISA of the Deposit Plan and its detailed allocations and polices has been undertaken. This includes assessment of site allocation policies in Monmouth
LPA Recommendation	No change required.
Appendix 1 - Review of Plans, Policies, Programmes and Strategies	• Refer to Appendix 1 noting there is no mention of Gloucestershire County Council's Minerals, Waste and Transport Plans – state this needs correcting [Gloucestershire County Council].
LPA Response	Comment noted, the Review of Plans, Policies, Programmes and Strategies makes it clear that the list is not exhaustive. No Minerals, Waste or Transport Plans have been included for adjoining Local authorities.
LPA Recommendation	No change required.
Promotion of sites	• Leathdunn Ltd promote CS0036 Land west of B4293 and north of Devauden [Johnsey Estates UK]. • Redrow Homes promote CS0270 Land north of Dixton Road, a number of queries to the ISA appraisal of Option H and I are listed. State Option I should be considered as the preferred strategic allocation in Monmouth [Redrow Homes]. • Redrow Homes promote CS0129 Dewstow Golf Course, a number of queries to the ISA appraisal of Option J and K are listed, object to the ISA conclusions of Severnside suggesting they are based on a flawed analysis. State Option K is a preferable site and should be included as the primary strategic growth option for Caldicot [Redrow Homes]. • Richborough Estates promote CS0087 The Showground and note concern technical information such as the masterplan, drainage strategy etc which address a lot of the points has not been considered. Concern over comments in relation to the historic environment. State the conclusions must be seen in the context of being based on a high-level assessment only and as such limitations in the conclusions and rankings which do not reflect the submissions made to date [Richborough Estates]. • Barwood Development Securities Limited promote CS0165 Mounton Road, Chepstow and consider Option E performs better than Options D and F and therefore better alternative to the strategic allocation in the RLDP [Barwood Development Securities Limited]. • Taylor Wimpey PLC promote CS0253 Ifton Manor Farm, note Option L which relates to this site is ranked the best performing option in terms of transport and movement. Suggest it is unclear how Option J could meet the criteria of Objective 15 of the ISA themes in relation to sustainable transport [Taylor Wimpey PLC].
LPA Response	The Council have provided reasons for the progression and rejection of options in Chapter 7 of the Deposit ISA. For a fair assessment of all options, site promoter details are not considered in detail, as these may not be available for all options. The ISA has informed the site selection process and has been updated as part of the Deposit Plan process.
LPA Recommendation	No change required.
Other	• Suggest the ISA adds little value to the plan-making process [Abergavenny & District Civic Society].

LPA Response	Comment noted, the SA/SEA is an integral part of the plan making process and a requirement of the Planning and Compulsory Purchase Act 2004 (section 62(6)). The SA/SEA process is integral to every stage of the plan preparation process.
LPA Recommendation	No change required.

Question 28 – Do you have any comments on the Habitats Regulations Assessment (HRA)?

15 organisations or members of the public submitted a response to question 28. Comments received covered key HRA impacts to be considered, mitigation strategies, the lack of information on site allocations to allow a full assessment to be undertaken and phosphates, particularly the potential solution in Monmouth.

Key Theme	Summary of Points Raised
Key HRA Considerations	• Gloucestershire CC agree that air quality, water quality/quantity, recreational pressure, and the potential for adverse impact of functional land are key considerations for the Deposit Plan. [Gloucestershire CC] • NRW agree with identified pathways. [NRW] • Advise that consideration to the fish interest of the Ramsar site is given in the deposit plan HRA. Detailed comments provided on impacts to be considered as part of the Deposit HRA. [NRW] • Undertaking an HRA is vitally important and must be applied to all allocations. [Private Individual] • Integrity of the Usk Bat Sites SAC should be taken extremely seriously. [Private Individual]
LPA Response	Comments noted.
LPA Recommendation	Continue to work collaboratively with the relevant organisations, including NRW, as part of the ongoing HRA of the RLDP.
Mitigation Strategies	• Recreational mitigation strategies for the Severn Estuary and Cotswold Beechwoods produced for parts of Gloucestershire are likely to be useful evidence as they are related to other LDPs nearby. Stroud District Council are a good contact for accessing the mitigation strategies and their associated visitor survey information. [Gloucestershire CC]
LPA Response	Comments noted.
LPA Recommendation	Review relevant recreational mitigation strategies as part of the ongoing HRA recommendations work.
Lacking information	• Frequent references without detailed information on proposals they cannot be assessed. Detail will not be available until the Deposit Plan is published so cannot be evaluated within comments on the Preferred Strategy. [Abergavenny & Crickhowell FoE, Private Individual, Usk Civic Society] • Does the HRA completely comply with the Environment (Wales) Act 2016? [Private Individual]
LPA Response	The HRA has been undertaken by Aecom Consultants and follows the relevant regulations appropriate for the different plan stages. A HRA of the Deposit Plan and its detailed allocations and polices has also be undertaken.

LPA Recommendation	No change required.
Phosphates	• Concern that upgrading sewage treatment for Abergavenny/Llanfoist will only partially deal with phosphate pollution of the River Usk. Strongly endorse planning conditions requiring phosphate neutrality. Non-statutory sector should also be included in ongoing work on maintaining the integrity of the SAC, e.g., Save the River Usk and Welsh Rivers Union. [Abergavenny & District Civic Society] • Development in Monmouth and the River Wye Catchment should not be ruled out for the Plan period due to phosphates as solution is likely. As a minimum CS0216 – Land off Hereford Road, Monmouth should be safeguarded, or development boundary adjusted with no allocation for development when phosphates conditions allow. [BB3 Limited, Manor Farm Partnership, Private Individuals x 3]
LPA Response	The Preferred Strategy (2022) proposed no new site allocations in Monmouth, or within the upper River Wye catchment north of Bigsweir Bridge and also assumed no existing planning permissions or small/windfall sites could come forward. This approach was taken due to the lack of an identified strategic solution to the treatment of phosphates at the Monmouth Wastewater Treatment Works (WwTW) within the Plan period. Welsh Government's response letter to the 2022 Preferred Strategy advised that new site allocations should be made in Monmouth on the basis that sufficient certainty is provided by DCWW's planned improvements at the Monmouth Wastewater Treatment Works by 31st March 2025. Following Welsh Government's confidence in the removal of this constraint, Council agreed in October 2023 to the identification of a strategic site in Monmouth as well as including allowances towards windfall and infill allowances and existing commitments already with planning permission. The Council has been working collaboratively with a range of organisations including NRW, Dŵr Cymru Welsh Water (DCWW), Welsh Government, other Councils in Wales and England, environmental groups, developers and other stakeholders to establish solutions that will ensure that development proposals do not have an adverse impact on water quality within the SAC rivers. The spatial strategy and site allocations have been prepared with regard to Dwr Cymru's planned improvements to waste water treatment works and NRW's review of permits. Commitment from DCWW to provide phosphate mitigation at the Llanfoist and Monmouth WwTWs and NRW's review of all permits and water quality to establish what capacity (if any) exists to enable development proposals to come forward while ensuring betterment or neutrality of phosphate levels has provided the necessary confidence to support the RLDP strategy.
LPA Recommendation	In accordance with the October 2023 Council Report, the Deposit Plan allows for growth in Monmouth. The Council will continue to work collaboratively with the relevant organisations with regard to phosphates and water quality issues.
Sites promoted in response to question 28	• BB3 Ltd – CS0216 Hereford Rd, Monmouth [BB3 Ltd] • Private Individual – CS0216 Hereford Rd, Monmouth [Private Individual] • Manor Farm Partnership – CS0216 Hereford Rd, Monmouth [Manor Farm Partnership] • Private Individual – CS0216 Hereford Rd, Monmouth [Private Individual] • Private Individual – Cs0216 Hereford Rd, Monmouth [Private Individual]
LPA Response	Candidate site submissions have been considered as part of the candidate site assessment. Individual site recommendations can be viewed in the Candidate Sites Assessment Report.
LPA Recommendation	See the Candidate Sites Assessment Report for Candidate Site recommendations.

4. Candidate Sites Register Summary of Representations

SETTLEMENTS IN THE CANDIDATE SITE REGISTER

Strategic Sites 147
Abergavenny 147
Chepstow 148
Monmouth 150
Severnside 151
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Strategic Sites

Abergavenny

Candidate Site: CS0213 Abergavenny East

		Responder:
Page 1625	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red. Southern boundary adjoins the essential setting of Coldbrook House, Caederwen and other farms shown on the Tithe, exist with similar field boundaries. *General support for the site:* 2. Abergavenny Town Council and Abergavenny & District Civic Society state that objection would be made to anything but a strategic decision that development here has to be the long-term future of Abergavenny. Various physical constraints make this area the only substantial option for town growth. The masterplanning EA should proceed if the feasibility and viability of land use allocation and the phasing of development are to be soundly based for inclusion in the replacement plan. 3. Responders feel that the site boundaries should extend to encompass more land adjoining A465 for a junction with the trunk road, station car parking and an active travel crossing to Station Road as well as providing a more direct access to Ross Road. Any active travel bridge or subway crossing the railway and the A465 must be attractive to use in all conditions. 4. The site sponsor, The Coldbrook Estate, has submitted supporting documents and includes the following points: • The site presents a logical extension to the town that could be well connected local services and facilities. • The land is not subject to any statutory designations and is located close to employment opportunities, schools, healthcare and the range of facilities and services offered by Abergavenny Town Centre. • Matters considered as part of delivering the vision for Abergavenny East includes provision of significant infrastructure, including a cycle footway bridge over the A465 and railway. 5. Many responders offer support for the site – which should benefit from its proximity to the A465, the railway station and services and facilities within the town. 6. Proximity of the rail station to the site has been emphasised and it is felt that a frequency of 4 trains per hour, twice the current frequency, is necessary. 7. Responders feel that the site should incorporate a suitable solution to the parking problem at the railway station. 8. Responders feel that the area is generally screened from A465 by trees and there are hedgerows and small woodlands that should be incorporated into the layout of development. 9. Responders state that the agricultural land appears to be of 3a and 3b value. 10. Responders suggest that the ecology of the site could be improved by development that incorporates landscaping that encourages biodiversity. 11. Responders feel that a smaller number of houses than proposed would be more in keeping the ambience of the town and area. 12. Support for the site as the development would be near places of employment to a minimise travel to work.	1. Glamorgan Gwent Archaeological Trust Ltd 2. Abergavenny Town Council, Abergavenny & District Civic Society, 1 Private Individual 3. Abergavenny Town Council, Abergavenny & District Civic Society, Abergavenny Transition Town 4. The Coldbrook Estate 5. 188 Private Individuals. 6. Abergavenny & District Civic Society 7. SOUL (163), 2 Private Individuals 8. Abergavenny Town Council, Abergavenny & District Civic Society 9. Abergavenny Town Council, Abergavenny & District Civic Society 10. 2 Private Individuals 11. 2 Private Individuals 12. 1 Private Individual 13. 1 Private Individual 14. 2 Private Individuals 15. 3 Private Individuals 16. 1 Private Individual 17. 1 Private Individual

	13. Responders feel that the site should be mixed use offering an industrial estate/business park as Abergavenny is devoid of any purpose built facilities. *General objection to the site:* 14. Concern re landscape sensitivity. The site forms a significant proportion of the area A019 in a landscaping sensitivity report (Mar 2021). The area is classed in the highest sensitivity bracket. 15. Concern re the impact of development on views from Abergavenny and Castle meadows and of the impact of light pollution on wildlife and biodiversity on The Little Skirrid and surrounding area. 16. Concern re the slope of the site and the difficulties this will pose for development. 17. Concern re run off water from the site and the potential risk of flooding this poses to the railway line. 18. Concern re the potential increase in traffic and the ability of the road network to cope. 19. Concern re lack of potential Active Travel solutions due to the railway line and A465 as well as the slope of the site. 20. Concern whether the site would be connected to the main sewage system or would require it's own treatment plant. 21. Concern re the power supply to the area being able to cope with new housing being all electric. 22. General concerns re local services and employment being sufficient to cater for a site this size.	18. 3 Private Individuals 19. 1 Private Individual 20. 1 Private Individual 21. 1 Private Individual 22. 1 Private Individual
LPA Response	Comments noted. It is proposed to allocate the site as Strategic Allocation. The allocation is a sustainably located edge of settlement site, located on the eastern edge of Abergavenny, that provides the longer-term intention for further growth beyond the Plan period. The site performs well against the site search sequence, with no significant constraints identified on site. The integration of the site with the existing settlement is a key principle with connection links forming a key policy requirement of the site's allocation. The site also meets key policy requirements including 50% affordable housing and net zero carbon homes demonstrating its viability and deliverability.	
LPA Recommendation	Retain Land to the East of Abergavenny East as a Strategic Allocation, with site specific policy requirements set out in Policy HA1 – Land to the East of Abergavenny.	

Chepstow

Candidate Site: CS0165 Land at Mounton Road, Chepstow		Representor:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Amber. Agricultural use and potential features associated with the Roman road at the south of the site. Development could be mitigated by condition, in accordance with an agreed Written Scheme of Historic Environment Mitigation. 2. Chepstow Town Council support the site as long as development provides at least 50% affordable housing. 3. Chepstow Town Council support for the site as development may provide employment opportunities. 4. Responders feel that the site should not be supported without infrastructure improvements including provision of a bypass, improvements to Highbeech roundabout and an M48 link. 5. Responders object as the site forms an essential part of the green wedge between Pwllmeyric and Chepstow. 6. Responders object to the development of green field sites when there are brownfield sites in the county.	1. Glamorgan Gwent Archaeological Trust Ltd 2. Chepstow Town Council 3. Chepstow Town Council 4. Cllr Louise Brown plus 3 Private Individuals

	7. Responders state that the proposed areas form the gateway to the Wye Valley which attracts visitors. 8. Responders feel that development of the site will have a visual impact on the nearby AONB and on the listed building adjacent to the site. 9. Concerns for the surrounding green spaces, used extensively by local people for leisure, and supports local, protected species such as deer, bats and birds of prey. 10. Responders state that the is on prime agricultural land which should not be developed. 11. Cllr Louise Brown states that the land should be reserved for potential roundabout improvements at Highbeech. 12. Concerns regarding the safety of a Proposed Balancing Lake for surface water drainage and concerns as to whether the sewage pumping facilities may be inadequate. 13. Responders feel there is a lack of detail in plans to provide new employment in the area. Workers currently employed in the area do not earn enough to be able to afford the properties being built. 14. A responder comments that the plan suggests working from home will continue but evidence suggests people are returning to the workplace. 15. Concerns that traffic congestion within Chepstow, particularly Highbeech roundabout and Hardwick Hill, is at unacceptable levels. Any incidents or planned closures cause excessive queues. 16. Concerns that Chepstow is a Designated Air Quality Management Area with high, potentially illegal, levels of air polution within Chepstow (contrary to Wellbeing of Future Generations Act). 17. Development in Gloucestershire, and the wider community, will impact traffic levels in Chepstow and demand for services. 18. A responder feels that access to the site will be challenging and require extensive remodelling of the Highbeech area. 19. Concerns that local infrastructure and services are already overstretched with no capacity to serve this site. Local roads are congested, public transport is poor, schools are oversubscribed, it's difficult to get a GP appointment, no spaces available at NHS dentists, no longer a local hospital facility. Shortage of leisure and community facilities and no cultural facilities such as a theatre or cinema. 20. Responders feel that the site is far from the town centre, and areas of local employment, and this along with the steep hills will encourage use of the car. 21. Responders feel that public transport is insufficient. This site is too far from the railway station and the hills too steep to encourage use of the train, thereby encouraging use of the car. 22. Concerns that there is no provision for safe walking and Active Travel routes. 23. Responders feel that little affordable/social housing has been provided and no evidence of any Section 106 funds relieving any of the underlying problems. Any housing built here should be affordable for the local community who work locally. 24. Concerns regarding lack of provision of formal and informal open spaces and Green Infrastructure onsite. 25. Concerns that congestion is putting visitors off coming to Chepstow and supporting the shops and food outlets, resulting in a disappointing level of shopping. 26. Concern that Chepstow is overdeveloped and will become a commuter town with no sense of community, and, with commuters bringing no benefit to local shops. 27. Criticism of the LDP process - no consultation on candidate sites for protection, CS0165 assessed as most favourable but not selected as the preferred site.	5. Mathern Community Council Cllr Louise Brown plus 4 Private Individuals 6. 2 Private Individuals 7. Mathern Community Council plus 7 Private Individuals 8. 8 Private Individuals 9. 8 Private Individuals 10. Mathern Community Council plus 3 Private Individuals 11. Cllr Louise Brown 12. 2 Private Individuals 13. 2 Private Individuals 14. 1 Private Individual 15. Mathern Community Council Cllr Louise Brown plus 22 Private Individuals 16. Mathern Community Council plus 10 Private Individuals 17. 3 Private Individuals 18. 1 Private Individual 19. Mathern Community Council Cllr Louise Brown plus 15 Private Individuals 20. 6 Private Individuals 21. 7 Private individuals 22. 3 Private Individuals 23. Mathern Community Council plus 2 Private Individuals 24. 3 Private Individuals 25. 2 Private Individuals 26. 3 Private Individuals 27. 6 Private Individuals 28. 1 Private Individual

	28. Responders state that the plan claims houses will be built as net carbon zero ready, however, no recent developments have been built to the high environmental standards we can now achieve. 29. Responders state that the Council's Integrated Sustainability Appraisal makes it clear that development anywhere in Chepstow will make current traffic and pollution issues worse, with the (WeITAG) study demonstrating that the High Beech roundabout is already at full capacity. 30. Concerns regarding contravention of UK Gov Policy, National Planning Policy and Localism Act - All residents of the affected areas will have a direct legal case for increased health risks. 31. Concern that growth proposed by MCC is in conflict with WG's in terms of the number of houses advised to match job creation/growth. Growth figures exceed advice by 40%.	29. 1 Private Individual 30. 4 Private Individuals 31. 2 Private Individuals
LPA Response	Comments noted. It is proposed to allocate the site as a Strategic Allocation in the Deposit Plan. The allocation is a sustainably located edge of settlement site that performs well against the site search sequence, with no significant constraints identified on site. The integration of the site with the existing settlement is a key principle with connection links forming a key policy requirement of the site's allocation. The site also meets key policy requirements, including 50% affordable housing and net zero carbon homes, demonstrating its viability and deliverability. The mixed-use development proposal, which includes a care home and hotel, is considered to have associated job creation and tourism benefits, with opportunities to work and live together and promote accessibility and connectivity to the existing settlement.	
LPA Recommendation	Include Land at Mounton Road, Chepstow as a Strategic Allocation, with site specific policy requirements set out in Policy HA3 – Land at Mounton Road, Chepstow.	

Monmouth

Candidate Site: CS0270 Leasbrook (Land north of Dixton Road)		Representor:
	No responses received	
LPA Response	It is proposed to allocate the site as a Strategic Allocation for approximately 270 homes. The allocation is a sustainably located edge of settlement site, north of Dixton Road. The site performs well against the site search sequence, with excellent links to the comprehensive school, facilities in the town centre and surrounding infrastructure. The site offers the opportunity to create an exemplar residential and GI-led development in a gateway location on the entrance to Monmouth. The site also meets key policy requirements, including 50% affordable housing and net zero carbon homes, demonstrating its viability and deliverability.	
LPA Recommendation	Include Land at Leasbrook, Monmouth as a Strategic Allocation, with site specific policy requirements set out in Policy HA4 – Land at Leasbrook, Monmouth.	

Severnside

Candidate Site: CS0087 Showground, Caldicot

		Representor:
Page 1629	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as RED – A previous response to the LDP and pre-planning consultation recommended desk-based assessment and geophysical survey prior to any determination of an application would inform mitigation, which may include further pre-determination work; additionally a Heritage Impact Assessment and to consult Cadw regarding any impact on the Scheduled Monuments nearby; our understanding of the site has not changed since then, and recommendation remains the same. 2. Responders concerned re flood risk (surface water and river) on site as the site is in a flood zone, and whether the proposed developments will make the issue worse or that the site is suitable for development at all. The runoff from the site causes issues with roads and properties nearby, concerns that this will increase with development. Concerns that an on-site sewage treatment plant is not feasible on the site, the discharge of treated effluent could not be made to watercourse due to distance, and other treatment methods would not be appropriate due to the land area required to comply with building regulations. A site-specific flood modelling exercise should be undertaken as existing flood mapping does not seem to be consistent with current events. SuDS would need to be carefully considered and built into high-level development proposals. Concerns re the capacity of the current water supply, sewerage and drainage systems, and their ability to cope with an increase in residential units. Will the increased sewage outflow have an impact on the Severn SAC / SPA? Concerns that the development will increase the phosphate issue. 3. Enquiries re the use of S106 funds to support a River Restoration Options Report for the lower 3km of the Nedern. Responders require clear evidence of where S106 money will be invested upfront and also evidenced on delivery. 4. Responder and site promoters, Richborough Estates are positive about the progression of the site into Stage 3A Candidate Site Assessment, and its suitability for residential development. They note that the site is not subject to any fundamental constraints that cannot be mitigated. The responders also note that an FCA will be submitted in support of any future planning application, demonstrating that the site can be brought forward. An initial masterplan demonstrates that no built development is proposed on the areas within Flood Zones 2/3, and that an appropriate sustainable drainage strategy would result in a downstream benefit through a reduction in peak flow run-off from the development. The initial masterplan also demonstrates that there will be no development in areas of SSSI. The responders strongly maintain that the Showground site is suitable for residential development. 5. Concerns re NHS services and a lack of health infrastructure, such as Doctors, GPs, and Dentists, struggling to meet the current demands, inducing long wait times for appointments and that a large development on this site would only exacerbate the current issues. Responders also concerned that no provisions have been made to deal with the increased demand for these services brought about by development on the site, such as a sufficient number of health job posts filled. Pharmacies and hospitals are also being overwhelmed. Responders concerned that there are no places in both the local Primary and Secondary	1. Glamorgan Gwent Archaeological Trust Ltd 2. Portskewett Community Council plus 17 Private Individuals 3. 2 Private Individuals 4. Richborough Estates 5. Portskewett Community Council plus 21 Private Individual 6. Portskewett Community Council plus 23 Private Individuals 7. 5 Private Individuals 8. Portskewett Community Council plus 15 Private Individuals 9. 13 Private Individuals 10. Portskewett Community Council 13 Private Individuals 11. 6 Private Individuals 12. Portskewett Community Council plus 4 Private Individuals 13. 6 Private Individuals 14. 5 Private Individuals 15. 1 Private Individual

	schools for existing residents, not including the new residents from developments on the site. Concerns re Telephone and Broadband services being able to keep up with current and future demands after the site has been developed. 6. Concerns re the site location and the increase in vehicle movement in the area once it's been developed. Concerns re the lack of pedestrian links from the site to Caldicot. Concerns that existing road infrastructure is not sufficient for existing volume of vehicles, with large volumes of traffic and long queues, let alone the vast increase after development has been complete. A "do-nothing" approach is not acceptable in Chepstow – The development on the site will increase traffic at High Beech subsequently increasing air pollution. Concerns that essential improvements to road infrastructure will not be completed by 2033. Responders concerned about traffic moving into smaller local lanes to find alternative routes, resulting in dangerous driving and the overuse of roads that are not meant to cope with that volume of traffic. Concerns that commuting will increase due to the developments on the site and the lack of local links prompts people to choose their cars over other modes of transport. Concerns re the lack of pavements in the areas surrounding the site. Noise pollution will also see a dramatic increase with development of the site reducing the quality of life and health conditions. Responders believe there is a need for a reduction in speed through Crick to 30mph. Concerns re a lack of safe crossing points to important zones such as school pick up and drop off points. Concerns regarding the route taken by construction traffic and its safety. Concerns re a lack of pedestrian links. Concerns re the quality of the roads in the area and an increase in volume of traffic will only deteriorate them further. Responders concerned over the lack of road infrastructure improvements made, compared to the volume of developments completed. Concerns over poor traffic movement due to 20mph speed limits and the increase of traffic in other areas in order to avoid the imposition. 7. Concerns that area is being developed to facilitate commuters, creating a suburb of Bristol, Newport, and Cardiff, capitalising on the proximity to the Severn crossing now that the tolls have been removed. 8. Concerns re town centre and its state of deterioration, many shops are empty, and the main street is not a very nice place to walk at night - therefore it is not suitable to support the needs of the existing community, which will only be amplified by the development of this site. Responders concerned as there are zero real plans for infrastructure and amenity improvement. Public transport services in the area are not sufficient – bus service is limited and does not support commuting, lack of accessibility to the nearest train station with inadequate parking facilities, and no provisions have been provided for safe walking and cycling routes. Concerns re a lack of facilities for young people such as children's playparks, youth centres. Caldicot leisure centre was due to be upgraded but has not happened. Responders believe the infrastructure and amenities to support such developments on the site should be addressed first. Responders concerned that development of the site removes an important recreation and tourist facility, which not only boosts the local economy but is one of the sole reasons people visit Caldicot. 9. Responders concerned re classification of the site as brownfield when the majority of the land is greenspace and could be classed as agricultural due to its uses, which will be lost after development. Responders note that the ecology of the natural environment should be protected for current and future generations. Concern re the finished site's ability to increase biodiversity in the area and that the development will cause habitat loss, increasing pressure on other areas of SSSI such as Nedern Wetland, due to increased human activity. Responders note that interruption to the Nedern Brook green corridor, and adverse effects on the landscape surrounding Caldicot Castle, including views in and out, would be undesirable and should be avoided.	16. 1 Private Individual 17. 1 Private Individual 18. 1 Private Individual 19. Edenstone 20. Taylor Wimpey PLC (Savills) 21. Taylor Wimpey PLC (Savills)

	10. Concerns re the size of the development and its location in relation to Caldicot, making the site appear like a new village. Concerns re size of development being too large when compared to other recent developments in the local area. The impacts of the developments scale would mean that local villages would be subsumed by Caldicot, impacting the local character and appearance of the area, removing their historic identity. Concerns re the number of developments in the local area surrounding the site and the proximity those developments to each other, noting the area to be overdeveloped. Responders note the volume of housing proposed for the site and believe the distribution is disproportionate to the rest of Monmouthshire, changing the dynamic of the surrounding area. 11. Concerns re the volume of social housing concentrated in Caldicot because of the development of this site and therefore the separation of people from the areas in which their families live. Concerns regarding the ability to fulfil affordable housing targets and that developers are allowed to build for profit, catering towards 4/5-bedroom homes for professional middle-aged people, and not for local young people. Concerns that the developments will be marketed towards those mainly from the Bristol area and won't be affordable for locals, noting that the average salary is much higher in Bristol than Monmouthshire. Responders desire a positive help to buy scheme for young locals. Responders note than the removal of the bridge tolls did not help young people to buy homes as the average house price in the area increased and that the Redrow Sudbrook development did not meet its affordable housing targets, suggesting that affordable housing should be allocated away from the Severnside area. 12. Concerns re limited employment opportunities in the area, especially for those without transport. Responders note that those who gain work in employment opportunities provided in the local area will not be able to afford to live in the areas being developed. 13. Responders concerned re change in use of the site as it currently promotes the local area and brings people to the town. Responders note that a key criterion for developing the candidate sites is tourism and that the current site's use provides a significant tourism element to the local economy as it hosts local, regional, national, and international level events throughout the year. Concerns re maintaining the area as country site and that attractions such as David Broom's Centre on the site, supports shops and food outlets providing local employment, which will be removed if developed. The Castle provides a brilliant venue for concerts, gatherings etc, which will be sat in the middle of a housing estate when the development is completed. Responders note that if this site is developed then it will lose its unique equine interest and business that it brings to the area. The visual proximity of the development to Caldicot Castle Country Park creates a negative heritage and wellbeing impact. Concerns that the development does not protect the landscape and heritage that makes Monmouthshire unique, special and an attractive place to live or help in sustaining rural communities. 14. Responders believe that the council's approach to Climate change is unsatisfactory and believe the high quality of environmental standards promised by developments will not be met, noting that the term "net zero ready homes" does not actually mean anything. Concerns that provisions made by the council towards the net zero goals will not prevent the detrimental impact this development will have on the surrounding area. Responders concerned that the allocation of this semi-rural site for development is in complete disregard to Monmouthshire's desires to cut commuting to work for environmental purposes. Concerns that this style of development is that of housing estates from the 70s and does not respect the environment.	

15. Responder believes there is a lack of trust between the council and the communities it serves as the council continues to ignore their comments and not communicate effectively, therefore the community will continue to object to these kinds of proposals.
16. Responder believes the plan contradicts itself as so much development has been proposed for Monmouthshire, yet it admits it is not in the national growth area identified in Future Wales 2040.
17. Responder notes that CS0251 Land at Bradbury Farm is to come forward in tandem with this site to proceed. Concerns re who is going to control the process and the risk involved, such as the Land at Bradbury Farm being developed but developers for this site changing their mind, or the landowner pulling out as it is a family run business, therefore producing a situation against Welsh Government Guidelines by building in open countryside.
18. Responder notes that the increased volume of new developments encouraging those from Bristol to move and commute, reduces the amount of local youngster, further contributing to a dilution of those who have an interest in speaking Welsh, which needs support if it is to survive in Monmouthshire.
19. Promoter for site CS0206, Edenstone, believe their site (Land South of Newport Road, Magor) best contributes to the vision and objectives of the RLDP and the achievement of sustainable development within the Severnside region when compared with CS0087 Showground for the below reasons.
    - The landscape of the Showground is more sensitive to residential development than that of the Land South of Newport Road, Magor.
    - Concerns that Showground land area is of predictive Grade 1 and 2 BMV, and that lower grade areas or non BMV, such as the Land South of Newport Road, Magor, should be considered in advance of BMV land.
    - Showground site is located a further walking distance away from the town centre than Land South of Newport Road, Magor is from Magor Centre. Time taken to walk from the Showground site to the town centre is greater than 20 minutes and over 30 minutes to the train station, therefore not meeting the council's aspirations for 20-minute neighbourhoods.
    - Concerns that the Showground site includes areas of flood risk.
    - Concerns that Caldicot East has the potential to impact upon Caldicot Conservation Area and Caldicot Castle Grade I Listed Building and Scheduled Monument, whereas Land South of Newport Road is free from any heritage constraints.
20. Promoter for site CS0253 and CS0254, Taylor Wimpey PLC (Savills), compares the performance of their site (Ifton Manor Farm, Site A and B), against CS0087 Showground, Caldicot (Caldicot East). Taylor Wimpey believe the Ifton Manor Farm site performs more strongly than the Caldicot East site for the following reasons.
    - Ifton Manor Farm site performs better in the Integrated Sustainability Appraisal than the Caldicot East Site.
    - Ifton Manor Farm site is more favourable in its ability to capitalise on Sustainable Transport Infrastructure and encourage modal shift.
    - Ifton Manor Farm performs better in 9, the same in 8 and worse in 1, when compared to the Caldicot East site, out of the objectives set out in the current Preferred Strategy to provide a useful framework to assess the performance of Strategic Growth Options.
    - Believes the proposed number of houses to be delivered within a set time frame for the Caldicot East site is unrealistic, due to reason such as securing planning permission, marketing the site, creation of new infrastructure to support the development and the rate of unit delivery seen in similar sites locally.

	21. Taylor Wimpey notes that the Preferred Strategy being consulted upon entirely fails to give due weight to the Integrated Sustainability Appraisal, therefore Taylor Wimpey notes the settlement to be unsound as the Caldicot East site was selected to proceed over Ifton Manor Farm.	
LPA Response	Comments noted. It is proposed to allocate the site as part of a wider Strategic Allocation for approximately 770 homes. The allocation is a sustainably located edge of settlement site and will extend the settlement of Caldicot to the north-east, adjacent to the Crick Road, Portskewett site. The site performs well against the site search sequence, with good links to a shop, open space and employment uses with facilities in the town centre just over a 20 minute walk. These links will be strengthened via active travel links throughout the site. While the site has good links to a nearby primary school, a new primary school will be provided on the site to assist with capacity issues in the area and provide benefits to the wider community. The site is partly a brownfield site as it includes an existing commercial equestrian centre that is relocating elsewhere. While the site is located in close proximity to heritage designations, no significant constraints are identified on the site. The site is also in close proximity to a SSSI. No built development will take place on these sensitive areas, with the area to the west of the former railway to be designated as an Area of Amenity Importance to provide additional protection. The site offers the opportunity to create an exemplar residential-led mixed-use development. The site also meets key policy requirements, including 50% affordable housing and net zero carbon homes, demonstrating its viability and deliverability.	
LPA Recommendation	Retain Land to the East of Caldicot/North of Portskewett as a Strategic Allocation, with site specific policy requirements set out in Policy HA2 – Land to the East of Caldicot/North of Portskewett.	
Candidate Site: CS0251 Land at Bradbury Farm, Crick		Representor:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as RED – A previous response to LDP consultation recommended desk-based assessment and geophysical survey prior to any determination of an application would inform mitigation, which may include further pre-determination work: our understanding of the site has not changed since the and recommendation stays the same. 2. Concerns re placemaking and its consideration of existing settlements, as building retail and leisure units on the site is likely to have an adverse effect on Caldicot town centre, where the focus should lie. 3. Promoter for site CS0206, Edenstone, believe their site (Land South of Newport Road, Magor) best contributes to the vision and objectives of the RLDP and the achievement of sustainable development within the Severnside region when compared with CS0087 Showground for the below reasons. • The landscape of the Showground is more sensitive to residential development than that of the Land South of Newport Road, Magor. • Concerns that Showground land area is of predictive Grade 1 and 2 BMV, and that lower grade areas or non BMV, such as the Land South of Newport Road, Magor, should be considered in advance of BMV land. • Showground site is located a further walking distance away from the town centre than Land South of Newport Road, Magor is from Magor Centre. Time taken to walk from the Showground site to the town centre is greater than 20 minutes and over 30 minutes to the train station, therefore not meeting the council's aspirations for 20-minute neighbourhoods. • Concerns that the Showground site includes areas of flood risk.	1. Glamorgan Gwent Archaeological Trust Ltd 2. 1 Private Individual 3. Edenstone 4. Taylor Wimpey PLC (Savills) 5. 1 Private Individual 6. Portskewett Community Council plus 14 Private Individuals 7. Portskewett Community Council plus 18 Private Individuals 8. Portskewett Community Council plus 18 Private Individuals 9. 5 Private Individuals

Page 1634	• Concerns that Caldicot East has the potential to impact upon Caldicot Conservation Area and Caldicot Castle Grade I Listed Building and Scheduled Monument, whereas Land South of Newport Road is free from any heritage constraints. 4. Promoter for site CS0253 and CS0254, Taylor Wimpey PLC (Savills), compares the performance of their site (Ifton Manor Farm, Site A and B), against CS0087 Showground, Caldicot (Caldicot East). Taylor Wimpey believe the Ifton Manor Farm site performs more strongly than the Caldicot East site for the following reasons. • Ifton Manor Farm site performs better in the Integrated Sustainability Appraisal than the Caldicot East Site. • Ifton Manor Farm site is more favourable in its ability to capitalise on Sustainable Transport Infrastructure and encourage modal shift. • Ifton Manor Farm performs better in 9, the same in 8 and worse in 1, when compared to the Caldicot East site, out of the objectives set out in the current Preferred Strategy to provide a useful framework to assess the performance of Strategic Growth Options. • Believes the proposed number of houses to be delivered within a set time frame for the Caldicot East site is unrealistic, due to reason such as securing planning permission, marketing the site, creation of new infrastructure to support the development and the rate of unit delivery seen in similar sites locally. • Taylor Wimpey notes that the Preferred Strategy being consulted upon entirely fails to give due weight to the Integrated Sustainability Appraisal, therefore Taylor Wimpey notes the settlement to be unsound as the Caldicot East site was selected to proceed over Ifton Manor Farm. 5. Responders require clear evidence of where S106 money will be invested upfront and also evidenced on delivery. 6. Responders concerned re flood risk (surface water and river) on site as the site is in a flood zone, and whether the proposed developments will make the issue worse or that the site is suitable for development at all. The runoff from the site causes issues with roads and properties nearby, concerns that this will increase with development. Concerns that an on-site sewage treatment plant is not feasible on the site, the discharge of treated effluent could not be made to watercourse due to distance, and other treatment methods would not be appropriate due to the land area required to comply with building regulations. A site-specific flood modelling exercise should be undertaken as existing flood mapping does not seem to be consistent with current events. SuDS would need to be carefully considered and built into high-level development proposals. Concerns re the capacity of the current water supply, sewerage and drainage systems, and their ability to cope with an increase in residential units. Will the increased sewage outflow have an impact on the Severn SAC / SPA? Concerns that the development will increase the phosphate issue. 7. Concerns re NHS services and a lack of health infrastructure, such as Doctors, GPs, and Dentists, struggling to meet the current demands, inducing long wait times for appointments and that a large development on this site would only exacerbate the current issues. Responders also concerned that no provisions have been made to deal with the increased demand for these services brought about by development on the site, such as a sufficient number of health job posts filled. Pharmacies and hospitals are also being overwhelmed. Responders concerned that there are no places in both the local Primary and Secondary schools for existing residents, not including the new residents from developments on the site. Concerns re Telephone and Broadband services being able to keep up with current and future demands after the site has been developed. 8. Concerns re the site location and the increase in vehicle movement in the area once it's been developed. Concerns re the lack of pedestrian links from the site to Caldicot. Concerns that existing road infrastructure is not sufficient for existing volume of	10. Portskewett Community Council plus 14 Private Individuals 11. 13 Private Individuals 12. Portskewett Community Council plus 10 Private Individuals 13. 5 Private Individuals 14. Portskewett Community Council plus 3 Private Individuals 15. 2 Private Individuals 16. 4 Private Individuals 17. 1 Private Individual 18. 1 Private Individual 19. 2 Private Individuals 20. 1 Private Individual 21. 1 Private Individual

vehicles, with large volumes of traffic and long queues, let alone the vast increase after development has been complete. A "do-nothing" approach is not acceptable in Chepstow – The development on the site will increase traffic at High Beech subsequently increasing air pollution. Concerns that essential improvements to road infrastructure will not be completed by 2033. Responders concerned about traffic moving into smaller local lanes to find alternative routes, resulting in dangerous driving and the overuse of roads that are not meant to cope with that volume of traffic. Concerns that commuting will increase due to the developments on the site and the lack of local links prompts people to choose their cars over other modes of transport. Concerns re the lack of pavements in the areas surrounding the site. Noise pollution will also see a dramatic increase with development of the site reducing the quality of life and health conditions. Responders believe there is a need for a reduction in speed through Crick to 30mph. Concerns re a lack of safe crossing points to important zones such as school pick up and drop off points. Concerns regarding the route taken by construction traffic and its safety. Concerns re a lack of pedestrian links. Concerns re the quality of the roads in the area and an increase in volume of traffic will only deteriorate them further. Responders concerned over the lack of road infrastructure improvements made, compared to the volume of developments completed. Concerns over poor traffic movement due to 20mph speed limits and the increase of traffic in other areas in order to avoid the imposition.

9. Concerns that area is being developed to facilitate commuters, creating a suburb of Bristol, Newport, and Cardiff, capitalising on the proximity to the Severn crossing now that the tolls have been removed.
10. Concerns re town centre and its state of deterioration, many shops are empty, and the main street is not a very nice place to walk at night - therefore it is not suitable to support the needs of the existing community, which will only be amplified by the development of this site. Responders concerned as there are zero real plans for infrastructure and amenity improvement. Public transport services in the area are not sufficient – bus service is limited and does not support commuting, lack of accessibility to the nearest train station with inadequate parking facilities, and no provisions have been provided for safe walking and cycling routes. Concerns re a lack of facilities for young people such as children's playparks, youth centres. Caldicot leisure centre was due to be upgraded but has not happened. Responders believe the infrastructure and amenities to support such developments on the site should be addressed first. Responders concerned that development of the site removes an important recreation and tourist facility, which not only boosts the local economy but is one of the sole reasons people visit Caldicot.
11. Responders concerned re classification of the site as brownfield when the majority of the land is greenspace and could be classed as agricultural due to its uses, which will be lost after development. Responders note that the ecology of the natural environment should be protected for current and future generations. Concern re the finished site's ability to increase biodiversity in the area and that the development will cause habitat loss, increasing pressure on other areas of SSSI such as Nedern Wetland, due to increased human activity. Responders note that interruption to the Nedern Brook green corridor, and adverse effects on the landscape surrounding Caldicot Castle, including views in and out, would be undesirable and should be avoided.
12. Concerns re the size of the development and its location in relation to Caldicot, making the site appear like a new village. Concerns re size of development being too large when compared to other recent developments in the local area. The impacts of the developments scale would mean that local villages would be subsumed by Caldicot, impacting the local character and appearance of the area, removing their historic identity. Concerns re the number of developments in the local area surrounding the site and the proximity those developments to each other, noting the area to be overdeveloped and urbanised.

Responders note the volume of housing proposed for the site and believe the distribution is disproportionate to the rest of Monmouthshire, changing the dynamic of the surrounding area.

13. Concerns re the volume of social housing concentrated in Caldicot because of the development of this site and therefore the separation of people from the areas in which their families live. Concerns regarding the ability to fulfil affordable housing targets and that developers are allowed to build for profit, catering towards 4/5-bedroom homes for professional middle-aged people, and not for local young people. Concerns that the developments will be marketed towards those mainly from the Bristol area and won't be affordable for locals, noting that the average salary is much higher in Bristol than Monmouthshire. Responders desire a positive help to buy scheme for young locals. Responders note than the removal of the bridge tolls did not help young people to buy homes as the average house price in the area increased and that the Redrow Sudbrook development did not meet its affordable housing targets, suggesting that affordable housing should be allocated away from the Severnside area.
14. Concerns re limited employment opportunities in the area, especially for those without transport. Responders note that those who gain work in employment opportunities provided in the local area will not be able to afford to live in the areas being developed.
15. Responders concerned re change in use of the site as it currently promotes the local area and brings people to the town. Responders note that a key criterion for developing the candidate sites is tourism and that the current site's use provides a significant tourism element to the local economy as it hosts local, regional, national, and international level events throughout the year. Concerns re maintaining the area as country site and that attractions such as David Broom's Centre on the site, supports shops and food outlets providing local employment, which will be removed if developed. The Castle provides a brilliant venue for concerts, gatherings etc, which will be sat in the middle of a housing estate when the development is completed. Responders note that if this site is developed then it will lose its unique equine interest and business that it brings to the area. The visual proximity of the development to Caldicot Castle Country Park creates a negative heritage and wellbeing impact. Concerns that the development does not protect the landscape and heritage that makes Monmouthshire unique, special and an attractive place to live or help in sustaining rural communities.
16. Responders believe that the council's approach to Climate change is unsatisfactory and believe the high quality of environmental standards promised by developments will not be met, noting that the term "net zero ready homes" does not actually mean anything. Concerns that provisions made by the council towards the net zero goals will not prevent the detrimental impact this development will have on the surrounding area. Responders concerned that the allocation of this semi-rural site for development is in complete disregard to Monmouthshire's desires to cut commuting to work for environmental purposes. Concerns that this style of development is that of housing estates from the 70s and does not respect the environment.
17. Responder believes there is a lack of trust between the council and the communities it serves as the council continues to ignore their comments and not communicate effectively, therefore the community will continue to object to these kinds of proposals.
18. Responder believes the plan contradicts itself as so much development has been proposed for Monmouthshire, yet it admits it is not in the national growth area identified in Future Wales 2040.
19. Responders note that the site is located in open countryside and only connects to Caldicot via a flood zone, both criteria for ruling out sites for allocation.

	20. Responder notes that there are areas that would make more sense, such as the fields over the road from the site behind the main road in Portskewett, that are owned by the council. 21. Responder in partial support but concerned re landscape impact east, land levels, over reliance on cars as too far from Caldicot and the site being nearer to M48 Chepstow junction than Severn Tunnel junction. Responder notes that the extent of CS0251 goes beyond the strategic extent identified and believes the site should be pulled back and reduced.	
LPA Response	Comments noted. It is proposed to allocate part of the site as part of a wider Strategic Allocation for approximately 770 homes. The allocation is a sustainably located edge of settlement site and will extend the settlement of Caldicot to the north-east, adjacent to the Crick Road, Portskewett site. The site performs well against the site search sequence, with good links to a shop, open space and employment uses with facilities in the town centre just over a 20 minute walk. These links will be strengthened via the provision of active travel links throughout the site. While the site has good links to a nearby primary school, a new primary school will be provided on the site to assist with capacity issues in the area and provide benefits to the wider community. While the site is located in close proximity to heritage designations, no significant constraints are identified on the site. The site is also in close proximity to a SSSI. No built development will take place on these sensitive areas, with the area to the west of the former railway to be designated as an Area of Amenity Importance to provide additional protection. The site offers the opportunity to create an exemplar residential-led mixed-use development. The site also meets key policy requirements, including 50% affordable housing and net zero carbon homes, demonstrating its viability and deliverability. 6ha of the northern part of the originally submitted Candidate Site has been included as a separate B1, B2, B8 allocated employment site namely EA1e Land adjoining Oak Grove Farm, Caldicot. A gypsy and traveller site is included within the red line boundary of the originally submitted Candidate Site and has been assessed as part of a different process.	
LPA Recommendation	Retain Land to the East of Caldicot/North of Portskewett as a Strategic Allocation, with site specific policy requirements set out in Policy HA2 – Land to the East of Caldicot/North of Portskewett.	

Primary Settlements

Abergavenny & Llanfoist

Candidate Site: CS0056 South Brecon Road, Abergavenny		Responder:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Amber - Adjacent to the route of a Roman Road, development could be mitigated by condition, in accordance with an agreed written scheme of Historic Environment Mitigation. 2. Concerns were raised by several responders that the site's western and southern boundaries are not effectively screened and the site is exposed to views from the National Park.	1. Glamorgan Gwent Archaeological Trust Ltd 2. Abergavenny Town Council, Abergavenny & District Civic Society

	3. Several responders feel the site should be included in the policy for a Green Wedge buffer between the built-up area and the National Park. 4. Traffic issues were raised with concerns that the existing road network would not cope with the increase in traffic and that a new junction may be required to access the A40. 5. A responder states that the site is grade 2 agricultural land. 6. A responder was concerned that the site would be isolated from the town by the A40 and might never form a natural part of the town active travel network. 7. Support for the size and location of the site. Hopeful that it can come forward sooner and provide much needed affordable homes.	3. Abergavenny Town Council, Abergavenny & District Civic Society 4. Abergavenny Town Council, Abergavenny & District Civic Society, Abergavenny Transition Town 5. Abergavenny & District Civic Society 6. Abergavenny Transition Town 7. Private Individual x 1
LPA Response	Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements. Landscape impact concerns have also been raised in relation to the site's allocation. In addition, the site is identified as a Green Wedge as part of the Green Wedge Assessment which has been undertaken to support the RLDP.	
LPA Recommendation	This site will not be allocated in the Deposit RLDP.	
Candidate Site: CS0094 Penlanlas Farm, Abergavenny		Responder:
	1. Concerns were raised by several responders regarding the slope of the site, and its prominence in views from the east, and the lack of green infrastructure to help it blend into the landscape. 2. Traffic issues were raised with concerns that increased traffic on Old Hereford Road would further overload Pen y Pound and its junction with the A40. 3. Responders suggest that the slope of the site might render substantial Active Travel unlikely and would limit access to existing shops and of the town centre by foot, therefore, requiring a frequent bus service / increased use of the car. 4. There is concern that allowing this site would set a precedent for other sites in the area. 5. Support for the allocation of Land at Penlanlas Farm in the RLDP Candidate Sites Register. 6. Glamorgan Gwent Archaeological Trust Ltd assess the site as Green - No recorded or known archaeological or historic environment issues.	1. Abergavenny Town Council, Abergavenny & District Civic Society, Abergavenny Transition Town 2. Abergavenny Town Council, Abergavenny & District Civic Society, Abergavenny Transition Town 3. Abergavenny Town Council, Abergavenny & District Civic Society, Abergavenny Transition Town 4. Abergavenny Town Council, Abergavenny & District Civic

		Society, Abergavenny Transition Town 5. Edenstone Homes 6. Glamorgan Gwent Archaeological Trust Ltd
LPA Response	Comments noted. Overall, the site performs well against the assessment methodology with no fundamental constraints identified. The site also benefits from good access to a range of services including schools and open space. A significant proportion of the site is also identified as being non-BMV land (63%), which performs well in a Monmouthshire context. The site also meets key policy requirements including 50% affordable housing and net zero carbon homes demonstrating its viability and deliverability. It is therefore proposed to allocate the site for 100 dwellings.	
LPA Recommendation	It is proposed to allocate the site for 100 dwellings with site specific policy requirements set out in Policy HA5 Land at Penlanlas Farm, Abergavenny.	
Candidate Site: CS0108 North Hillgrove Avenue, Abergavenny		Responder:
	1. Abergavenny Town Council state that the site is within CSP004, proposed Green Wedge between the built-up area and the National Park boundary at the highest part of the wedge. 2. Abergavenny Town Council feel that while development of the site would align with development to the south, the average slope is about 1 in 8 which is much steeper than recently developed land to the east. 3. No objection in principle from Abergavenny Transition Town & Abergavenny & District Society – whilst the site is in CSP004 as part of the Green Wedge it is now felt that the site is not essential to the purposes of the Green Wedge or its development unacceptable in the landscape. If development goes ahead the green wedge should be formally and legally defined to prevent an argument that this development site sets a precedent. 4. Responders feel that a thick hedgerow on the western boundary should be safeguarded, as should mature trees within the site and on its eastern boundary. 5. Responders state that the site may be Grade 3a agricultural land. 6. Responders suggest that vehicular access should be via Bretherton Way and/or Hillgrove Avenue/Poplars Road (with protection of trees) to avoid reliance on access only via the persimmon estate which would mean both estates using a single connection to Hereford Road. 7. A responder states that the site would be close to a Primary School and shops etc. The town centre is about 2.5kms away. Hereford Road has an hourly bus service but the new estate would need a service. Some active travel connectivity may be available via the Persimmon estate when it is completed. 8. Glamorgan Gwent Archaeological Trust Ltd assess the site as Green - No recorded or known archaeological or historic environment issues. 9. The site promotor, The Stantonbury Building and Development Company, submitted a Vision Document to support consideration of their proposal.	1. Abergavenny Town Council 2. Abergavenny Town Council 3. Abergavenny & District Civic Society, Abergavenny Transition Town 4. Abergavenny & District Civic Society, Abergavenny Town Council 5. Abergavenny & District Civic Society 6. Abergavenny Town Council, Abergavenny & District Civic Society, Abergavenny Transition Town 7. Abergavenny & District Civic Society 8. Glamorgan Gwent Archaeological Trust Ltd

		9. The Stantonbury Building and Development Company
LPA Response	Comments noted. Site is not progressing as the highway authority has raised significant concerns in relation to achieving suitable access arrangements. Landscape impact concerns have also been raised reflecting the lack of supporting information with the submission and the likely significant adverse visual impact on the Landscape Character Area. Overall, there are considered to be more suitable sites available in Abergavenny.	
LPA Recommendation	This site will not be allocated in the Deposit RLDP.	
Candidate Site: CS0128 Land at Chapel Farm, Abergavenny		Responder:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red - A linear parchmark is noted in the HER, this may be related to field boundaries remaining which are depicted in the Tithe of 1848. 2. Responders state that the site is within CSP003 one of the proposed Green Wedge buffers between the built-up area and the National Park boundary and should be protected. Desire to retain the town's natural historic boundary with the National Park and keep the attractive setting of the Brecon Beacons, the town is famed for, intact. 3. Concern that the site is prominent to views from the south towards Pentre Lane with no mitigating green infrastructure to help absorb it into the landscape. 4. Site believed to be a SINC and of very high ecological value supporting a high level of natural wildlife including birds of prey and mammals. 5. Responders suggest that although the site may accommodate as many as 250 homes a much lower density would be necessary to reflect the character of adjoining development. 6. Concern that Pentre Road (and surrounding roads) are very narrow lanes unsuitable for much vehicular traffic but popular for active travel and should be retained as such. 7. Believed to be some liability to flood towards Pentre Road and fears this development could increase run-off flooding. 8. Concerns that the connecting road network is inadequate to cope with a significant increase in traffic. This level of development would require a new direct access to the A40. 9. Concerns that increase in traffic will cause queuing and affect air quality. 10. Concerns regarding site access. 11. Responders state that there are no local shops, town centre services are up to 2km away and only a two-hourly bus service. No extra jobs, schools or medical facilities are being proposed. 12. The capacity of the local sewer network has been questioned and concerns regarding flooding caused by heavy rainfall. 13. Believed to be Grade 3b agricultural land. Quality grazing land. 14. Concerns that development at this site would set a precedent for other sites within CSP003. 15. Responders state that Pentre Road and Pentre Lane provide valuable, accessible, amenity for the community: walking, cycling, riding. Hill walking corridor from Fairfield car park to several routes onto the Sugar Loaf, encouraging tourism.	1. Glamorgan Gwent Archaeological Trust Ltd 2. Abergavenny Town Council, Abergavenny & District Civic Society, Abergavenny Transition Town, plus 103 Private Individuals 3. Abergavenny Town Council, Abergavenny & District Civic Society, Abergavenny Transition Town, plus 17 Private Individuals 4. 18 Private Individuals 5. Abergavenny Town Council, Abergavenny & District Civic Society 6. Abergavenny Town Council, Abergavenny & District Civic Society plus 9 Private Individuals. 7. Abergavenny Town Council, Abergavenny & District Civic

	16. Responders state that the site provides a sense of tranquillity which is enjoyed by both locals and visitors, encouraging tourism, and benefiting health and wellbeing. 17. Concern that the site contains The Pentre and is directly overlooked by Llwyndu Court, both listed buildings in their own special landscape settings. 18. Concern that the site adjoins the Abergavenny Conservation Area. 19. Responders state that Pentre Road forms the natural boundary to Abergavenny and development north of this road should not be allowed. 20. Responders feel that brownfield sites, and empty buildings, should be developed before destroying the countryside. 21. Abergavenny is already heavily developed; questioned whether the site is needed. 22. General objection to development of this site.	Society, plus 2 Private Individuals. 8. Abergavenny Town Council, Abergavenny & District Civic Society, Abergavenny Transition Town, Plus 50 other Private Individuals. 9. 8 Private Individuals. 10. 17 Private Individuals. 11. Abergavenny Town Council, Abergavenny & District Civic Society, plus 12 Private Individuals 12. Abergavenny Town Council, Abergavenny & District Civic Society, plus 10 Private Individuals 13. Abergavenny & District Civic Society, plus 17 Private Individuals 14. Abergavenny Town Council, Abergavenny & District Civic Society, 1 Private Individual 15. 36 Private Individuals 16. 18 Private Individuals 17. 9 Private Individuals 18. 12 Private Individuals 19. 2 Private Individuals 20. 2 Private Individuals 21. 1 Private Individual 22. 92 Private Individuals
LPA Response	Comments noted. Site not progressing as there are unresolved concerns regarding highways and access arrangements including flood risk to the south of the site onto Pentre Road and the suitability of the alternative access onto Pentre Lane. The whole site is also Grade 2 BMV agricultural land and there are more	

	suitable alternatives site with lower grade agricultural land in Abergavenny. In addition, the site is identified as a Green Wedge following the Green Wedge Assessment. Overall, there are considered to be more suitable sites available in Abergavenny.
LPA Recommendation	This site will not be allocated in the Deposit RLDP.

Candidate Site: CS0161 Land north of Hillside, Abergavenny	Responder:
1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red - Includes part of the Registered Park and Garden of The Hill PGW (Gt) 62(MON). Cadw must be consulted and a Heritage Impact Assessment undertaken. 2. Several responders feel the site should be included in the policy for a Green Wedge buffer between the built-up area and the National Park. 3. The site is wooded and several comments were received stating that the woodland is an important element of the town's green infrastructure and is prominent from the east. 4. A suggestion was made that a small number of homes, similar to those in the grounds of The Hill, might acceptable within the less wooded western portion of the site which falls within the Abergavenny Conservation Area. 5. Traffic issues were raised with concerns that increased traffic on Old Hereford Road would further overload Pen y Pound and its junction with the A40. It was also stated that Deri Road should not be used for access to any development. 6. Responders felt that the building of the King Henry 8 school has increased traffic excessively and that school children are at risk whilst using the narrow footpath. 7. Responders suggest that the slope of the site might render substantial Active Travel unlikely and would limit access to existing shops and the town centre by foot, therefore, requiring a frequent bus service. 8. A responder feels that this is not a suitable site for residential development and that there is a better site within the candidate site list.	1. Glamorgan Gwent Archaeological Trust Ltd 2. Abergavenny Town Council, Abergavenny & District Civic Society 3. Abergavenny Town Council, Abergavenny & District Civic Society 4. Abergavenny Town Council, Abergavenny & District Civic Society 5. Abergavenny Town Council, Abergavenny & District Civic Society, Abergavenny Transition Town, 1 Private Individual 6. 1 Private Individual 7. Abergavenny Town Council, Abergavenny & District Civic Society 8. Abergavenny Transition Town
LPA Response	Comments noted. Site not progressing due to concerns raised by CADW in relation to the western part of candidate site being inside the boundaries of The Hill registered historic park and garden, with the rest of the area being an essential part of its setting. Concerns have also been raised in relation to the ecological impact development would have. In addition, the site is identified as a Green Wedge following the Green Wedge Assessment. Overall, it is considered that the desired levels of growth can be accommodated on less sensitive sites within the area.
LPA Recommendation	This site will not be allocated in the Deposit RLDP.

Candidate Site: CS0164 Land adjacent to Red Barn Farm (RBF1)		Responder:
Page 1643	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Amber. Adjacent to the route of a Roman Road, previously recommended condition for written scheme of investigation for archaeological watching brief. 2. Abergavenny Town Council object as the site falls within CSP002. 3. Several responders state that the National Park buffer zone proposal could allow for a trunk road by-pass, however, this is now unlikely due to WG policies. 4. Abergavenny & District Civic Society and Abergavenny Transition Town support the site if it is needed in this plan and if Abergavenny East site is unviable. 5. A responder states that the site is Grade 3a agricultural land. 6. Responders state the site is close to the National Park boundary but visually separated from it by a belt of woodland. 7. Responders state that flood risk from mountain streams may reduce the potential number of dwellings; potentially 60 homes but half that if a road line had to be safeguarded. Site is on an active floodplain. 8. Responders state that a new access to the A40 would be needed; perhaps shared with a new hospital access. 9. Abergavenny Transition town wants the spinney between the two sites retained for an active travel route. 10. Concerns that traffic will increase on road which are already at capacity. 11. Concerns that there is a shortage of doctors, dentists and school places within Abergavenny. 12. Concerns regarding a lack of employment in the area; houses should be built where there are employment opportunities. 13. Abergavenny Transition town suggests that any housing ought to be prioritised for allocation to hospital staff to reduce in-commuting. 14. Concern that access to the site is difficult and would require the removal of hedgerows. Responders state that the hedgerow along the A40 should be retained. 15. A responder states that the site is part of the river Usk SAC; it is presently open fields, with a rural feel, and provides natural habitat for bats, hedgehogs, voles and many other protected species. 16. The site falls within the Neville Hall RIGS and comprises three components: Neville Hall moraine feature and section, cemented outwash gravel section, post-glacial abandoned river channels and scroll marks on floodplain. The impact of proposed developments will depend on the nature of the RIGS feature, so early consultation with the local RIGS group or NRW is strongly recommended. 17. A responder states that the site is adjacent to Red Barn Farm listed buildings and forms part of its unique setting or curtilage. 18. Concerns that development would cause noise and light pollution to surrounding protected areas. 19. Concerns re increased pollution into the river Usk and Nant Iago stream. 20. Concerns re detriment to visual amenity for residents and tourists as well as loss of privacy for residents living next to the site.	1. Glamorgan Gwent Archaeological Trust Ltd 2. Abergavenny Town Council 3. Abergavenny Town Council, Abergavenny & District Civic Society, Abergavenny Transition Town 4. Abergavenny & District Civic Society, Abergavenny Transition Town 5. Abergavenny & District Civic Society 6. Abergavenny Town Council, Abergavenny & District Civic Society 7. Abergavenny Town Council, Abergavenny & District Civic Society plus 1 Private Individual 8. Abergavenny Town Council, Abergavenny & District Civic Society, Abergavenny Transition Town 9. Abergavenny Transition Town 10. 1 Private Individual 11. 1 Private Individual 12. 1 Private Individual 13. Abergavenny Transition Town 14. Abergavenny Town Council, Abergavenny & District Civic

		Society, Abergavenny Transition Town plus 1 Private Individual 15. 1 Private Individual 16. SEWRIGS group 1 Private Individual 17. 1 Private Individual 18. 1 Private Individual 19. 1 Private Individual 20. 1 Private Individual
LPA Response	Comments noted. Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements. The site is also wholly grade 2 BMV agricultural land and there are more suitable alternatives site with lower grade agricultural land in Abergavenny. Concerns have also been raised in relation to the impact on the setting of the listed building.	
LPA Recommendation	This site will not be allocated in the Deposit RLDP.	
Candidate Site: CS0174 Nantgavenny Lane, Abergavenny		Responder:
	1. The site is within CSP001 the proposed Green Wedge to protect the lower sides of the Gavenny Valley from further development. The Gavenny Valley should be protected as a vital publicly accessible green lung. 2. Concerns that the steeply sloping wooded lower part of the site is a SINC and partly liable to flood. 3. Concerns regarding the impact of housing on landscape value, the wildlife interest and the river quality. 4. Responder states that the site is Grade 3a agricultural land.	1. Abergavenny Town Council, Abergavenny & District Civic Society, Abergavenny Transition Town 2. Abergavenny Town Council, Abergavenny & District Civic Society 3. Abergavenny Town Council, Abergavenny & District Civic Society 4. Abergavenny & District Civic Society
LPA Response	Comments noted. Viability Assessment not submitted to support proposal. The site was therefore not assessed as part of Stage 3A/3B and has not progressed further in the candidate site assessment process.	
LPA Recommendation	This site will not be allocated in the Deposit RLDP.	

Candidate Site: CS0178 Abergavenny Workhouse		Responder:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Amber. Built 1837-9 as a Workhouse, some alteration and restoration, any change will need mitigation; building recording and potentially archaeological monitoring of ground disturbance by condition, in accordance with an agreed Written Scheme of Historic Environment Mitigation. 2. Responders suggest that the present designation as a protected employment site should be maintained particularly for its wide variety of different building volumes and types. 3. Responders suggest that although only one building is listed, the complex of Victorian workhouse buildings has considerable architectural and historic qualities that would benefit from tidying up. 4. Concern regarding CS0178 and CS0286 appearing the same, apart from residential being included in CS0286. Clarification wanted whether the schemes include any demolition.	1. Glamorgan Gwent Archaeological Trust Ltd 2. Abergavenny Town Council, Abergavenny & District Civic Society, Abergavenny Transition Town 3. Abergavenny Town Council, Abergavenny & District Civic Society, Abergavenny Transition Town 4. Abergavenny Town Council, Abergavenny & District Civic Society, Abergavenny Transition Town
LPA Response	Comments noted. Site not progressing as while it performs well against the site search sequence criteria, insufficient information has been submitted to undertake a full assessment. Therefore, the site will not be allocated in the RLDP. However, given the site's location within the settlement boundary proposals can be pursued via the planning application system, subject to detailed planning policies.	
LPA Recommendation	This site will not be allocated in the Deposit RLDP.	

Candidate Site: CS0185 West of Glebe Cottage, Abergavenny		Responder:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Amber. Potential Medieval settlement and land use; desk-based assessment undertaken; archaeological monitoring of ground disturbance by condition, in accordance with an agreed Written Scheme of Historic Environment Mitigation. 2. Conditional acceptance by Abergavenny Town Council and Abergavenny & District Civic Society – The site lies within CSP001 proposed Green Wedge to protect the attractive and wildlife rich lower sides of the Gavenny Valley from development. It is also within the setting of St Teilo's Church, a Grade 1 Listed Building. 3. In 2018 Abergavenny & District Civic Society objected to an application for housing on the site. Following considerable modification, the application (for 12 affordable homes) was approved but is on hold due to drainage issues. We can now accept development here provided that the design and purpose of the housing are little changed.	1. Glamorgan Gwent Archaeological Trust Ltd 2. Abergavenny Town Council, Abergavenny & District Civic Society 3. Abergavenny & District Civic Society 4. Abergavenny Transition Town

	4. Abergavenny Transition Town state that the Gavenny Valley should be protected as a vital publicly accessible piece of green infrastructure, a green lung from the centre of town out to the open countryside along the river that gave the town its name.	
LPA Response	Comments noted. Site not progressing via the RLDP process as insufficient information has been submitted in relation to the candidate site submission. Therefore, the site will not be allocated in the RLDP. It is noted however, that planning application DM/2018/00834 for a rural exceptions site for 12 affordable dwellings is pending consideration following the Welsh Government decision to not call in the application for determination by the Welsh Ministers.	
LPA Recommendation	This site will not be allocated in the Deposit RLDP.	
Candidate Site: CS0192 Old Hereford Road, Abergavenny		Responder:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Green. No recorded or known archaeological or historic environment issues. 2. Responders state that the site is within CSP004 the proposed well-defined Green Wedge buffer between the built-up area and the National Park boundary. It lies at the highest part of the Wedge and is particularly prominent in views from the east. 3. Concerns regarding increased traffic on Old Hereford Road which further overload Pen y Pound and it's junction with the A40. 4. Concerns that the slope of the site would make substantial Active Travel unlikely and would limit the accessibility of local shops and the town centre. 5. Responders state that a frequent bus service would be essential. 6. The site sponsor, Candleston Homes, has submitted extensive information in support of the site, and includes the following points: • The site is in Flood Zone 1 for both Rivers and Sea, and, surface water flooding; therefore there is no reason why the site cannot be developed from a flood risk. • Landscape and Green Infrastructure assessments conclude that the site is suitable for development with appropriate mitigation. • A high pressure gas main crosses the site which affects the site's capacity but not it's overall suitability. • The site is sustainably located and is proximate to a range of services and well served by existing active travel routes and public transport. • The Site Ecology Assessment concludes the site is considered to have 'Medium' value and would be suitable for development.	1. Glamorgan Gwent Archaeological Trust Ltd 2. Abergavenny Town Council, Abergavenny & District Civic Society, 1 Private Individual 3. Abergavenny Town Council, Abergavenny & District Civic Society, Abergavenny Transition Town, 1 Private Individual 4. Abergavenny Town Council, Abergavenny & District Civic Society 5. Abergavenny Town Council, Abergavenny & District Civic Society 6. Candleston Homes
LPA Response	Comments noted. The site is not allocated as there is sufficient and more suitable land available for residential development within Abergavenny to accommodate its housing need.	
LPA Recommendation	This site will not be allocated in the Deposit RLDP.	

Candidate Site: CS0220 Ross Road, Abergavenny		Responder:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red. Area includes a Water Mill, probably of Medieval origin, part of Mardy Park, also potentially of Medieval origin and prehistoric artefacts noted. 2. Object – the site is the key section of CSP001 protecting the Gavenny Valley between the built-up area and the railway/A465 from further development. 3. Concern that part of the site is a SINC and liable to flood. These flood plains help protect the town from flooding further downstream. Further concerns are that developing this steeply sloping site would further increase the risk of flood during periods of heavy rain fall. 4. An ancient woodland SSSI is astride the site north of Ross Road forming an east-west wildlife corridor that continues east of A465. Many TPOs believed to be present. Undisturbed landscape and wildlife qualities of CSP001 would be lost. This is a vital, publicly accessible green lung from the town centre to the open countryside used as amenity land by local residents and organised groups. 5. Responders state that the river Gavenny which runs through the site has a healthy population of White Clawed Crayfish - protected under the Wildlife and Countryside Act 1981 / listed as endangered on the global IUCN Red List of Threatened Species and must be protected. 6. Responders state that the MCC Ecological Site Assessment, undertaken on this site during preparation of the previous plan, identified that the bio-diversity constraints were enough to recommend that development of a large proportion of the site should be avoided. 7. Responder suggests the site may be grade 3a agricultural land. 8. Concern regarding access issues from Ross Road; Nantgavenny Lane is unsuitable as access. 9. Concern regarding the potential increase in traffic and the ability of the road network to cope. 10. Responders feel that there is a lack of public transport into Abergavenny. 11. Concern regarding local services being able to cope with an increase in population as well as poor accessibility to local amenities from the site. 12. Concerns that the drainage and sewerage systems are at capacity. 13. Comments regarding currently uninterrupted views to the Skirrid mountain and countryside, from many areas of the Mardy and north Abergavenny, which would be adversely affected. 14. Responders stated that currently there is a high number of empty and unsold homes (both existing and new build) in the local area, so why build more? 15. Responders state that other housing developments in the area have caused pollution of the river and received NRW fines and warnings. This site is closer to the river on both sides and likely to cause significant pollution. 16. Responders feel that the site would be subject to excessive noise from the railway line and the A465. The woodland on site currently helps to reduce the noise from the A465 for residents to the West. 17. Concerns for light pollution and the loss of dark skies at night which support many species such as owls and bats as well as providing a venue for local 'stargazers'. 18. Responders state that preserving the site supports MCC, Welsh Government and NRW environmental policies.	1. Glamorgan Gwent Archaeological Trust Ltd 2. Abergavenny Town Council, Abergavenny & District Civic Society, plus 8 Private Individuals 3. Abergavenny Town Council, Abergavenny & District Civic Society, plus 28 Private Individuals. 4. Abergavenny Town Council, Abergavenny & District Civic Society, Abergavenny Transition Town, plus 29 Private Individuals. 5. 12 Private Individuals 6. 9 Private Individuals 7. Abergavenny & District Civic Society 8. Abergavenny Town Council, Abergavenny & District Civic Society, plus 13 Private Individuals. 9. 16 Private Individuals. 10. 6 Private Individuals. 11. 10 Private Individuals 12. 4 Private Individuals 13. 3 Private Individuals 14. 2 Private Individuals 15. 16 Private Individuals. 16. 3 Private Individuals 17. 3 Private Individuals 18. 5 Private Individuals

LPA Response	Comments noted. Site not progressing as insufficient information has been submitted in relation to viability to demonstrate the site is deliverable in accordance with key policy requirements. Significant concerns have also been raised in relation to highway and pedestrian access to the site and ecological impact given the SSSI and SINC designations relating to the site.
LPA Recommendation	This site will not be allocated in the Deposit RLDP.

Candidate Site: CS0247 Coopers III, Llanfoist	Responder:
1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red. The HER notes earthworks, agricultural features and boundaries. *No objection in principle* 2. Concern that road access via an extension of Jones Close would only be acceptable for about 10 homes and would require significant engineering. Access via the private treatment works access lane would require negotiation and improvement, including its junction with A4143. 3. Concern that land south of the access lane appears to be partly liable to flooding and there is a substantial wooded wetland in the lower part of the northern section, possibly of considerable ecological value, so not suitable for development. 4. A responders suggests that much of the field to the east is above the flood plain and should be considered for future integrated development. 5. A responders suggests that the trees on the northern boundary and the hedgerows on the easter and southern boundaries (of the northern section) should be substantially retained. 6. The site sponsor, Johnsey Estates UK, has submitted information in support of the site and includes the following points: • The site is located close to employment opportunities, schools, healthcare and facilities and services at Abergavenny Town Centre and Llanfoist. • The southern parcel of land is available for any required off-site ecological mitigation and/or drainage should either be necessary.	1. Glamorgan Gwent Archaeological Trust Ltd 2. Abergavenny & District Civic Society 3. Abergavenny & District Civic Society, Abergavenny Transition Town 4. Abergavenny & District Civic Society 5. Abergavenny & District Civic Society 6. Johnsey Estates UK

LPA Response	The site is not allocated as there is sufficient and more suitable land available for residential development within the primary settlement of Abergavenny including Llanfoist to accommodate its housing need.
LPA Recommendation	This site will not be allocated in the Deposit RLDP.

Candidate Site: CS0248 Adj Llanfoist Primary School (Whole Site)	Responder:
1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red. The HER notes the area as forming part of a 17th century park with likely Medieval origins. 2. Responders stated that the woodland area of the site should not be built on.	1. Glamorgan Gwent Archaeological Trust Ltd 2. Abergavenny & District Civic Society,

	3. Concerns that the southern part of the site would be a marked, detached protrusion beyond the now well-defined eastern boundary of Llanfoist. 4. Responders stated that the site is Grade 2 – 3b agricultural land. 5. Concerns that development of the site would ruin the clear views to the mountains, and the edge of countryside feel, from the playground of the Primary school; a vital part of the children's heritage.	Abergavenny Transition Town 3. Abergavenny & District Civic Society 4. Abergavenny & District Civic Society 5. Abergavenny Transition Town
LPA Response	Comments noted. Site not progressing as fundamental highways concerns have been raised as there is no adopted highway access available. Concerns have also been raised in relation to landscape and ecological impact. Overall, there are other sites in Abergavenny that are considered to be more suitable.	
LPA Recommendation	This site will not be allocated in the Deposit RLDP.	

Candidate Site: CS0249 Red Barn Farm (RFB2), Abergavenny

		Responder:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Amber. Formerly part of Neville Hall Park (Neville Court; The Brooks). Built 1860s; previously existing manor. Unlikely to require mitigation. 2. Responders state that the site falls within CSP002, a National Park buffer zone proposal that also could allow for a trunk road by-pass (current WG policy prohibits this now). 3. A responder felt that development would be a clearly visible urban intrusion into the Usk valley. It should remain part of a buffer zone between the well-landscaped hospital and the Park boundary. 4. A responder suggests that the spinney between the two sites should be retained for an active travel route that could connect to the Llanwenarth national cycle route. 5. A responder suggests that housing ought to be prioritised for hospital staff to reduce in-commuting. 6. A responder feels that a new access would be needed to the A40, perhaps shared with a new hospital access. 7. A responder feels that the hedgerow along A40 should be retained, contributing to the green corridor entry to the town. 8. SEWRIGS group state that the two sites fall within the Nevill Hall RIGS comprising of three components. Nevill Hall moraine feature and section, cemented outwash gravel section, post-glacial abandoned river channels and scroll marks on floodplain. The impact of proposed developments will depend on the nature of the RIGS feature, so early consultation with the local RIGS group or NRW is strongly recommended.	1. Glamorgan Gwent Archaeological Trust Ltd 2. Abergavenny & District Civic Society, Abergavenny Transition Town 3. Abergavenny & District Civic Society 4. Abergavenny Transition Town 5. Abergavenny Transition Town 6. Abergavenny Transition Town 7. Abergavenny Transition Town 8. SEWRIGS group
LPA Response	Comments noted. Site not progressing as insufficient information has been submitted in relation to viability to demonstrate the site is deliverable in accordance with key policy requirements. There are also landscape impact concerns associated with development of the site. Delivery of this site is dependent on the allocation of CS0164 – Red Barn Farm (1), which has been deemed unsuitable for allocation.	
LPA Recommendation	This site will not be allocated in the Deposit RLDP.	

Candidate Site: CS0250 Land at Evesham Nurseries, Llanfoist		Responder:
Page 1650	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red. Consult Cadw regarding the need for an ASIDOHL to determine the impact on the adjoining Blaenavon Registered Landscape of Outstanding Historic Interest. The Blaenavon Industrial Landscape World Heritage Site also adjoins and assessment of the impact of the proposal on this is needed. Other features are noted in the area. 2. A responder states that the site is Grade 3a agricultural land? 3. Concerns re lack of local shops and facilities. 4. Responders state that despite no extra allocations being made in the 2011-2021 LDP about 180 homes have been permitted in recent years and further allocations may be unpopular. Any further increase seems disproportionate to the number needed across the county. 5. A responder suggests that the sire, formerly a major horticultural site; could become an allotment site when the church reclaims the current site. 6. The site sponsor, Bellway Homes, has submitted supporting documents and includes the following points: • The site will not be at significant risk of flooding or increase the flood risk to others. • The site has access to a wide range of services and facilities within Abergavenny. • The site has access to excellent road links, railway station and a range of bus services. • Potential for 105 dwellings and is genuinely deliverable. 7. Concerns that some of the site has risk of flooding. 8. Concerns for an ancient mound on the site. 9. Concerns that access to the site is difficult. 10. Responders state that the south west side of the site is bounded by the cycling route NCN46; making a crossing through this would diminish the amenity of the route. 11. Concerns re the potential increase in traffic and the ability of the road network to cope. 12. Concerns that development would compromise views and diminish the enjoyment of visitors and locals who use the canal and footpaths. 13. Responders state that only a small proportion of the site is adjacent to the existing Llanfoist development boundary; adding this site would create a large peninsula with no natural boundary features. 14. Responders state that the site is not within a tier of the settlement hierarchy that allows for growth in the Preferred Strategy.	1. Glamorgan Gwent Archaeological Trust Ltd 2. Abergavenny & District Civic Society 3. Abergavenny & District Civic Society 4. Abergavenny & District Civic Society, 2 Private Individuals 5. Abergavenny Transition Town 6. Bellway Homes 7. 3 Private Individuals 8. 3 Private Individuals 9. 3 Private Individuals 10. 3 Private Individuals 11. 3 Private Individuals 12. 3 Private Individuals 13. 2 Private Individuals 14. 2 Private Individuals
LPA Response	Comments noted. Site is not allocated as there is sufficient and more suitable land available for residential development within the primary settlement of Abergavenny including Llanfoist to accommodate its housing need.	
LPA Recommendation	This site will not be allocated in the Deposit RLDP.	

Candidate Site: CS0263 Adj Llanfoist Fawr Primary School		Responder:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Green. No recorded or known archaeological or historic environment issues. 2. Abergavenny & District Civic Society and Abergavenny Transition Town state that the site is a solitary and valuable woodland Green Infrastructure. May need an ecological survey to establish quality. Should not be disturbed by development.	1. Glamorgan Gwent Archaeological Trust Ltd 2. Abergavenny & District Civic Society, Abergavenny Transition Town
LPA Response	Comments noted. Site not progressing as fundamental highways concerns have been raised as there is no adopted highway access available. Concerns have also been raised in relation to landscape and ecological impact. Overall, there are other sites that are considered to be more suitable in Abergavenny.	
LPA Recommendation	This site will not be allocated in the Deposit RLDP.	

Candidate Site: CS0264 Land north of St Teilos, Abergavenny		Responder:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red. HER notes the area has a corn mill, and a post Medieval bridge is at the edge of the site. Less than 30m to the Medieval church enclosure. 2. Concerns that the site adjoins the National Park boundary and within CSP001. 3. Responders state that the site lies beyond the built-up extent of the town and is part of an area astride the Park boundary where residential development was quite recently refused by both MCC and the Park Authority. 4. Concern that development would detract from St Teilo's Church, a Grade 1 Listed Building.	1. Glamorgan Gwent Archaeological Trust Ltd 2. Abergavenny Town Council, Abergavenny & District Civic Society, Abergavenny Transition Town 3. Abergavenny Town Council, Abergavenny & District Civic Society, Abergavenny Transition Town 4. Abergavenny Town Council, Abergavenny & District Civic Society, Abergavenny Transition Town, Sore Group
LPA Response	Comments noted. Site not progressing as significant concerns raised in relation to the heritage and ecological impact of developing the site. The central section of the site is also within a flood risk area.	

LPA Recommendation	This site will not be allocated in the Deposit RLDP.

Candidate Site: CS0265 Tredilion Park, Abergavenny		Responder:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red. Tredilion Park: noted as Post-Medieval Park. Also traditional burial place of an Orgo the Giant, said to be pre AD634. 2. Abergavenny & District Civic Society and Abergavenny Transition Town state there is no need to designate this site for tourism/leisure as already partly used for this and any planning applications should be considered through the planning process.	1. Glamorgan Gwent Archaeological Trust Ltd 2. Abergavenny & District Civic Society, Abergavenny Transition Town, Sore Group
LPA Response	Comments noted. While internal and external consultee comments were obtained on tourism sites, the proposed tourism policy approach in the Deposit Plan more appropriately allows for consideration of sustainable tourism related proposals, including beyond identified settlement boundaries. It is therefore not considered appropriate/necessary to identify site specific tourism related allocations in the RLDP.	
LPA Recommendation	This site will not be allocated in the Deposit RLDP.	

Candidate Site: CS0266 Land at Nantgavenny Business Park, Abergavenny		Responder:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Green. No recorded or known archaeological or historic environment issues. 2. Conditional Acceptance – site is within CSP001, however, due to recent provision of business units north of the site and the need for allocations of employment land in the area we do not object to light industrial use of the western park of this site provided specific conditions are met. 3. Responders feel that the lower part of the site should be kept open similar to approved proposals at CS0185 and approval should not lead to further similar developments in Mardy Park to the south. 4. Responders feel that the site edge nearest to the river should be carefully landscaped and filled with suitable, biodiverse planting.	1. Glamorgan Gwent Archaeological Trust Ltd 2. Abergavenny Town Council, Abergavenny & District Civic Society, Abergavenny Transition Town 3. Abergavenny Town Council, Abergavenny & District Civic Society 4. Abergavenny Transition Town
LPA Response	Comments noted. The site forms a logical extension to the adjoining business park and would provide much needed employment land in Abergavenny.	
LPA Recommendation	It is therefore proposed to allocate the site for B1 employment use as set out in Policy EA1, with the site specific reference EA1a Land at Nantgavenny Business Park, Abergavenny.	

Candidate Site: CS0267 Waterloo Court, Llanfoist		Responder:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red. Part of the area falls within the Historic Landscape Character Area HLCA012 Llanfoist. Buildings noted as tenements on the Tithe Map & Apportionment of 1843 on the roadside. 2. Abergavenny & District Civic Society and Abergavenny Transition Town have no objection in principle.	1. Glamorgan Gwent Archaeological Trust Ltd 2. Abergavenny & District Civic Society, Abergavenny Transition Town, SOUL
LPA Response	Comments noted. The small-scale nature of the site does not justify an allocation in the Plan. Further consideration will be given to the site as part of the settlement boundary review.	
LPA Recommendation	This site will not be allocated in the Deposit RLDP.	

Candidate Site: CS0268 Westgate Gardens, Abergavenny		Responder:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Amber. Adjoins the Registered Park of Linda Vista and the Essential Setting. Assessment of the impact will need to be undertaken to Cadw Guidance. 2. Responders state that this site is an important piece of green infrastructure within the Conservation Area. 3. Concern that the area acts as a flood meadow. 4. Responders suggest that a derelict gateway at the western end suggests history worth investigating. 5. Abergavenny Transition Town have no objection in principle.	1. Glamorgan Gwent Archaeological Trust Ltd 2. Abergavenny Town Council, Abergavenny & District Civic Society, 1 Private Individual 3. Abergavenny Town Council, Abergavenny & District Civic Society, 1 Private Individual 4. Abergavenny Town Council, Abergavenny & District Civic Society, 1 Private Individual 5. Abergavenny Transition Town

LPA Response	Comments noted. The small-scale nature of the site does not justify an allocation in the Plan. Further consideration will be given to the site as part of the settlement boundary review.
LPA Recommendation	This site will not be allocated in the Deposit RLDP.

Candidate Site: CS0269 Land at Grove Farm, Llanfoist	Responder:
1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red. The HER notes the area as forming part of a 17th century park and house, both with likely Medieval origins. Desk-based assessment and geophysical survey prior to any determination of an application would inform mitigation, which may include further pre-determination work. 2. Objections due to insufficient information on what is intended as 'residential care' and until there is more detail it will not be known whether this is serving a justifiable local need. 3. A responder felt that the Preferred Strategy suggests that the development of this area is unnecessary in the plan period. 4. The site is Grade 2 – 3b agricultural land. 5. SOUL supports the proposal.	1. Glamorgan Gwent Archaeological Trust Ltd 2. Abergavenny & District Civic Society, Abergavenny Transition Town 3. Abergavenny & District Civic Society 4. Abergavenny & District Civic Society 5. SOUL

LPA Response	Comments noted. Site not progressing as significant concerns have been raised in relation to highway and pedestrian access to the site and ecological and heritage impact.
LPA Recommendation	This site will not be allocated in the Deposit RLDP.

Candidate Site: CS0284 Pen-y-Worlod Stables, Llanfoist	Responder:
1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Green. No recorded or known archaeological or historic environment issues. 2. Abergavenny & District Civic Society object – the site is dependent on CS0250 to which we also object. 3. SOUL Support the site.	1. Glamorgan Gwent Archaeological Trust Ltd 2. Abergavenny & District Civic Society 3. SOUL

LPA Response	Comments noted. Site not progressing as it is does not provide a natural and logical extension to the settlement and does not relate physically, functionally or visually to the existing settlement pattern. Given the small numbers proposed, the site would result in a pocket development detached from the main settlement of Llanfoist. Furthermore, insufficient information has been submitted in order to conduct a full assessment of the site in relation ecology and highways.

LPA Recommendation	This site will not be allocated in the Deposit RLDP.

Candidate Site: CS0286 Abergavenny Workhouse, Abergavenny	Responder:
1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Amber. Built 1837-9 as a Workhouse, some alteration and restoration, any change will need mitigation; building recording and potentially archaeological monitoring of ground disturbance by condition, in accordance with an agreed Written Scheme of Historic Environment Mitigation. 2. Responders state that the present designation as a protected employment site should be maintained. 3. Responders state that while only one building is Listed, the complex of Victorian workhouse buildings would benefit from tidying up.	1. Glamorgan Gwent Archaeological Trust Ltd 2. Abergavenny Town Council, Abergavenny & District Civic Society, Abergavenny Transition Town 3. Abergavenny Town Council, Abergavenny & District Civic Society, Abergavenny Transition Town

LPA Response	Comments noted. Site not progressing as while it performs well against the site search sequence criteria, insufficient information has been submitted to undertake a full assessment. Therefore, the site will not be allocated in the RLDP. However, given the site's location within the settlement boundary proposals can be pursued via the planning application system, subject to the detailed planning policies.
LPA Recommendation	This site will not be allocated in the Deposit RLDP.

Chepstow

Candidate Site: CS0029 Barnetts Farm Chepstow	Representor:
1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Amber. Earlier buildings noted on historic mapping sequences, condition for written scheme of investigation for mitigation in accordance with an agreed Written Scheme of Historic Environment Mitigation. 2. A responder stated that information presented did not identify the number, type, or mix of dwellings/affordable dwellings proposed. 3. Responders want no more development without affordable housing - no more housing at prices locals cannot afford. 4. Objection to developing green field (agricultural) sites when there are brown field sites in the county. 5. The proposed areas form the gateway to the Wye Valley which attracts visitors. 6. The proposed areas are in close proximity to ancient woodland and an AONB. 7. Concerns that Chepstow, and the local area, is already subject to traffic congestion and high levels of air pollution.	1. Glamorgan Gwent Archaeological Trust Ltd 2. Mathern Community Council, 1 Private Individual 3. 4 Private Individuals 4. 6 Private Individuals 5. 1 Private Individual 6. 6 Private Individuals 7. 16 Private Individuals

	8. A responder states that Chepstow businesses are losing custom due to traffic problems. 9. A responder states that MCCs Integrated Sustainability Appraisal makes it clear that development anywhere in Chepstow will make the current traffic and pollution issues worse. 10. A responder states the annual objective level, in MCCs Local air management strategy, is being exceeded on Hardwick Hill. 11. There should be no more building until a bypass is built from the Severn Bridge to Gloucestershire. Closure of a road for planned maintenance caused tailbacks from Highbeech to Lydney, Thornwell and across the Severn bridge. 12. Concerns that road access in any direction is unsuitable and unsafe. 13. Mathern Community Council state that no public transport serves this site. 14. A responder states that no shops or employment at this site. 15. Concerns re poor broadband services and increased demand for schools, doctors and dentists. 16. Planning proposals in Gloucestershire will also have a detrimental effect on Chepstow. 17. A responder feels that more development at this site is excessive and will add to the general inability of Chepstow town to cope with more commuters who add nothing to the local economy. 18. Concerns that drainage in the outfall area of this site (surface and foul) is overcapacity with Mounton being flooded via the brook annually and having raw sewage emitting from Manholes. 19. Responders feel that infrastructure and service improvements would be necessary before any development at this site. 20. Responders feel that development will ruin views of the area. 21. CS0165 Mounton Road is a large site and nearer the motorway access and within walking distance of the town centre so appears to be a better option.	8. 1 Private Individual 9. 1 Private Individual 10. 1 Private Individual 11. 1 Private Individual 12. 3 Private Individuals 13. Mathern Community Council 14. 1 Private Individual 15. Mathern Community Council, 1 Private Individual 16. 9 Private Individual 17. 1 Private Individual 18. 3 Private Individual 19. Mathern Community Council, 3 Private Individuals 20. Mathern Community Council, 6 Private Individuals 21. 1 Private Individual
LPA Response	Comments noted. Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements. This site is also considered to be of small scale and would have limited impact on achieving the required quantum of development in this area. Overall, there are considered to be more be more suitable sites available in Chepstow.	
LPA Recommendation	This site will not be allocated in the Deposit RLDP.	
Candidate Site: CS0054 West of Racecourse Roundabout, Chepstow		Representor:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Amber. Route of Roman roads in and adjacent to the site, buildings noted on historic mapping sequences to the north, condition for written scheme of investigation for mitigation in accordance with an agreed Written Scheme of Historic Environment Mitigation. 2. Objection to developing green field sites when there are brown field sites in the county. 3. The proposed areas form the gateway to the Wye Valley which attracts visitors. 4. Concerns re loss of views towards the Wye Valley. 5. The proposed areas are in close proximity to ancient woodland and an AONB. 6. Multiple protected species of bat and newt have habitats in the surrounding green spaces and use the site to transit and maintain their habitats.	1. Glamorgan Gwent Archaeological Trust Ltd 2. 3 Private Individuals 3. 2 Private Individuals 4. 6 Private Individuals 5. 6 Private Individuals 6. 5 Private Individuals 7. 2 Private Individuals 8. 1 Private Individual

	7. Agricultural land should not be used for housing. 8. Concerns regarding the only access to the adjacent agricultural land being through the site offered for development. 9. Concerns that Chepstow, and the local area, is already subject to traffic congestion, long queues, and high (illegal) levels of air pollution. Hardwick Hill and Highbeech roundabout are particular pinch points. 10. Planning proposals in Gloucestershire will also have a detrimental effect on the traffic issues in Chepstow. 11. Responders stated that MCCs Integrated Sustainability Appraisal makes it clear that development anywhere in Chepstow will make the current traffic and pollution issues worse. Development will contravene UK, National and local policies. 12. There should be no more building until a bypass is built from the Severn Bridge to Gloucestershire. Closure of a road for planned maintenance caused tailbacks from Highbeech to Lydney, Thornwell and across the Severn bridge. 13. A responder states that Chepstow businesses are losing custom due to traffic problems. 14. Responders feel that the site is too far from public transport options, which are poor and cannot be relied upon to the meet the needs of a working population, and the area too steep for active travel. 15. Responders feel that overdevelopment is having a detrimental effect on residents and visiting tourists. 16. A responder states that the information presented does not identify the number, type or mix of dwellings/affordable dwellings proposed. 17. Responder feels that the site would be better accessed from the Itton Road as there is a roundabout junction for that road with the A466. 18. A responder feels that residential development would be poor use of the eastern part of this site; could be a visitor attraction or hotel if development is necessary. 19. Concerns that existing community/public services are already overstretched. Infrastructure and service improvements would be necessary before any development at this site. 20. Responders want no more development without affordable housing. No more housing at prices locals cannot afford. 21. Concerns that there are no recreation or leisure facilities, nor green infrastructure included in the plans. 22. Concerns regarding the proposed lake for surface water drainage and for the adequacy of sewage pumping facilities. 23. Concerns regarding water run off and the impact of development on the water table. 24. Support for the site having excellent road access, suitable crossings and pedestrian access to the town and local amenities.	9. 16 Private Individuals 10. 4 Private Individuals 11. 4 Private Individuals 12. 1 Private Individual 13. 1 Private Individual 14. 9 Private Individuals 15. 2 Private Individuals 16. 1 Private Individual 17. 1 Private Individual 18. 1 Private Individual 19. 10 Private Individuals 20. 3 Private Individuals 21. 1 Private Individual 22. 1 Private Individual 23. 1 Private Individual 24. 1 Private Individual
LPA Response	Comments noted. Site not progressing as insufficient information has been submitted in relation to demonstrating viability and deliverability in accordance with key policy requirements. Inclusion of the site of this scale would also have a negative impact on ecology due to loss of a locally protected SINC and nationally important Priority Habitats.	
LPA Recommendation	This site will not be allocated in the Deposit RLDP.	
Candidate Site: CS0098 Bayfield, Chepstow		Representor:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Amber. Development could be mitigated by condition, in accordance with an agreed Written Scheme of Historic Environment Mitigation. 2. Support for the site as long as development provides at least 50% affordable housing.	1. Glamorgan Gwent Archaeological Trust Ltd

Page 1658	3. The site promotor, Vistry, has submitted extensive information in support of the site and makes the following key points: • The site is not subject to any fundamental constraints that cannot be mitigated. • The development proposals are designed in such a way that a green buffer can be maintained with Pwllmeyric ensuring no coalescence of these settlements. • The site is not located in an area at risk of flooding. • Around 13ha of green infrastructure will permeate the development and will include the retention and enhancement of the vast majority of woodland and boundary vegetation. • The Preliminary Transport Appraisal has identified an improvement scheme which would alleviate capacity constraints on the High Beech Roundabout; the proposed development could facilities the implementation of such a scheme. 4. Responders have support for the overall strategy but state that this site cannot be developed until the infrastructure within Chepstow to support it has been expanded. 5. Responders state that no development should go ahead until a bypass has been provided. 6. Objection to developing green field sites (with public rights of way) when there are brownfield sites in the county. 7. Responders state that the proposed areas form the gateway to the Wye Valley which attracts visitors. 8. Concerns that the site is in close proximity to an AONB. 9. Responders state that the site is adjacent to an ancient woodland, used extensively by local people for leisure, and supports local, protected species such as deer, bats and birds of prey. 10. Responders state that the site has acknowledged national landscape interest and would be entirely inappropriate for the site to be allocated for development. 11. Responders feel that the development of the site would detract unacceptably from the wider AONB setting. The visual distinction between town and protected woodland would be lost forever. 12. Responders state that the site is on prime agricultural land. 13. Several responders feel that the site is sloping away from the main settlement, visually relating to the AONB rather than the town, and not being conducive to quality placemaking. 14. Concerns that traffic congestion within Chepstow, particularly Highbeech roundabout and Hardwick Hill, is at unacceptable levels. Any incidents or planned closures cause excessive queues. 15. Concerns re Chepstow being a Designated Air Quality Management Area with high, potentially illegal, levels of air pollution (contrary to Wellbeing of Future Generations Act). 16. Development proposals in Gloucestershire, and the wider community, will impact traffic levels in Chepstow and demand for services. 17. Responders feel that the site is at a dangerous location for pedestrians (no safe walking routes) and active travel routes are not viable. 18. Responders feel that the B4235 is not suitable for heavy traffic and will be increasingly dangerous during construction and afterwards. 19. Concerns that local infrastructure and services are already overstretched with no capacity to serve this site. Local roads are congested, public transport is poor, schools are oversubscribed, it's difficult to get a GP appointment, no spaces available at	2. Chepstow Town Council 3. Vistry 4. 4 Private Individuals 5. 12 Private Individuals 6. 20 Private Individuals 7. 9 Private Individuals 8. Cllr Christopher Edwards, 54 Private Individuals 9. 52 Private Individuals 10. 3 Private Individuals 11. Cllr Christopher Edwards, 15 Private Individuals 12. 11 Private Individual 13. Cllr Christopher Edwards, 1 Private Individual 14. Mathern Community Council, Cllr Christopher Edwards, 83 Private Individuals 15. 44 Private Individuals 16. 27 Private Individuals 17. Cllr Christopher Edwards, 21 Private Individual 18. 4 Private Individuals 19. Mathern Community Council, 76 Private Individuals 20. Cllr Christopher Edwards, 40 Private Individuals 21. Cllr Christopher Edwards, 44 Private Individuals 22. 17 Private Individuals 23. 10 Private Individuals 24. 1 Private Individual

	NHS dentists, no longer a local hospital facility. Shortage of leisure and community facilities and no cultural facilities such as a theatre or cinema. 20. Responders feel that this site is farthest from the town centre and areas of local employment and involves steep walks back from the centre. 21. Responders state that the site is far from public transport routes and no improvement in public transport recently. Lack of suitable services (no direct rail link to Bristol) as well as cost encourages driving. 22. Concern that congestion is putting visitors off coming to Chepstow and supporting the shops and food outlets, resulting in a disappointing level of shopping. 23. Responders want no more housing at prices that locals cannot afford. 24. Concern that affordable housing will attract crime, drugs and other anti social behaviour. 25. Concern that Chepstow is overdeveloped and will become a commuter town with no sense of community. 26. Concerns regarding potential groundwater contamination, from construction, of the natural spring below the site. 27. Concerns regarding potential flooding as currently significant throughflow of water through adjacent streets during heavy rainfall. 28. Concerns that development in Chepstow has the potential to impact the River Wye SSSI and to impact the Wye Valley Woodlands SSSI/National Nature Reserve through atmospheric pollution. 29. Concerns that development would affect the right to light as it would impact the solar generation of solar panelled properties. 30. Responders state that the Council's Integrated Sustainability Appraisal makes it clear that development anywhere in Chepstow will make current traffic and pollution issues worse, with the (WeITAG) study demonstrating that the High Beech roundabout is already at full capacity. 31. Concern that growth figures conflict with WG advice to limit number to a miximum of 4275 new houses and exceed this target by 40%. 32. Concern that the Council's aspirations for job created lack credibility. 33. A responder feels that building near the Severn bridge will attract middle aged commuters from Bristol and South Gloucestershire rather than the young people needed to rebalance the County's demography. 34. Responders state that recent Planning Application for the site has over 800 oppositions. Site also previously refused planning for reasons which are still valid. 35. Criticism of the LDP process - re 2nd consultation so soon after 1st, this site being the preferred option whilst not scoring the best. Plans not aligned with WG policy. 36. Responders ask why were only 7.5% of houses on the Fairfield Mabey site allocated for affordable on that brownfield site. Now MCC is saying this greenfield site is required for Affordable Housing. 37. Concerns regarding provision of formal and informal open spaces and Green Infrastructure onsite - history of developers not delivering.	25. 17 Private Individuals 26. 1 Private Individual 27. 13 Private Individuals 28. 3 Private Individuals 29. 4 Private Individuals 30. 16 Private Individuals 31. 16 Private Individuals 32. 6 Private Individuals 33. 1 Private Individual 34. 12 Private Individuals 35. 12 Private Individuals 36. 7 Private Individuals 37. 10 Private Individuals
LPA Response	Comments noted. In October 2023 a report of post consultation Preferred Strategy changes was agreed by Council. This included amending the strategic site in Chepstow from Bayfield to Land at Mounton Road. On balance, it is considered that the benefits of the commercial development and associated job creation at the Mounton Road site outweighed the loss of higher quality agricultural land and encroachment into the existing green wedge separating Chepstow and Pwllmeyric, given the absence of alternative commercial sites and the importance of Chepstow for tourism as the gateway to the Wye Valley.	

	It is considered that sufficient separation between Chepstow and Pwllmeyric would remain to prevent coalescence of the settlements. As such, it is considered that there is sufficient and more suitable land available for residential development within the town to accommodate its housing need.
LPA Recommendation	This site will not be allocated in the Deposit RLDP.

Candidate Site: CS0112 Land at St Lawrence Lane, Chepstow	Representor:
1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red. The HER indicates the course of a Roman road passing through the south of the site, the potential site of a medieval Grange, and findspots of both Roman and Medieval date. Desk-based assessment and geo-physical survey prior to any determination of an application would inform mitigation, which may include further pre-determination work. 2. The site promotor, Vistry, has submitted extensive information in support of the site and makes the following points: • The site is not subject to any fundamental constraints that cannot be mitigated. • The proposals will maximise opportunities for active travel with a network of well connected pedestrian and cycle links that also have the advantage of providing enhanced sustainable links between Pwllmeyric and Chepstow. • The development proposals are designed in such a way that a green buffer can be maintained with Pwllmeyric ensuring no coalescence of these settlements. • The site is not located in an area at risk of flooding. • The Preliminary Transport Appraisal has identified an improvement scheme which would alleviate capacity constraints on the High Beech Roundabout; the proposed development could facilities the implementation of such a scheme. 3. Responders state that a green wedge between Chepstow and Pwllmeyric is essential (to help retain their own identities) so would not support the development of CS0112. 4. Objection to developing Green field sites when there are brownfield sites within the county. 5. Responders state that the site is on prime agricultural land. 6. Responders state that the proposed areas form the gateway to the Wye Valley which attracts visitors. Development would ruin views of the AONB. 7. A responder feels that development would have a detrimental effect on the wildlife that currently resides in the area and hedgerows. 8. Responders feel that green spaces enjoyed by the community should not be built on. 9. Responders state that no development should go ahead until a bypass has been provided and substantial improvements to Highbeech roundabout. 10. Concerns that access onto the A48 here would be dangerous and difficult to use due to queuing traffic. 11. Concerns that traffic congestion within Chepstow, particularly Highbeech roundabout and Hardwick Hill, is at unacceptable levels. Any incidents or planned closures cause excessive queues. 12. Concerns that Chepstow is a Designated Air Quality Management Area with high, potentially illegal, levels of air pollution (contrary to Wellbeing of Future Generations Act). 13. Development in Gloucestershire, and the wider community, impacts traffic levels in Chepstow and demand for services.	1. Glamorgan Gwent Archaeological Trust Ltd 2. Vistry 3. Chepstow Town Council, Mathern Community Council, Cllr Louise Brown, 4 Private Individuals 4. 3 Private Individuals 5. Mathern Community Council, 2 Private Individuals 6. 11 Private Individual 7. 1 Private Individual 8. 3 Private Individuals 9. Cllr Louise Brown, 3 Private Individuals 10. Cllr Louise Brown, 1 Private Individual 11. Mathern Community Council, Cllr Louise Brown, 15 12. Mathern Community Council, 9 13. 4 Private Individuals 14. Mathern Community Council, Cllr Louise Brown, 14 15. 1 Private Individual 16. 5 Private Individuals 17. 2 Private Individuals 18. 3 Private Individuals

Page 1661	14. Concerns that local infrastructure and services are already overstretched with no capacity to serve this site. Local roads are congested, public transport is poor, schools are oversubscribed, it's difficult to get a GP appointment, no spaces available at NHS dentists, no longer a local hospital facility. Shortage of leisure and community facilities and no cultural facilities such as a theatre or cinema. 15. Concerns that the plans don't include any additional recreation or leisure facilities. What Green Infrastructure will be included? 16. Responders feel that affordable housing is needed but no evidence of this being supplied on current developments. The only housing that should be built in the area should be Affordable for local workers only. 17. Responders state that the plan suggests working from home will continue but evidence suggests people are returning to the workplace. 18. Concern re lack of plans to increase employment in the area. Workers currently employed in the area do not earn enough to be able to afford the properties being built. 19. Responders state that site is far from the town centre, and areas of local employment, and involves steep walks back from the centre. 20. Responders state that site is far from public transport routes and no improvement in public transport recently. Lack of suitable services (no direct rail link to Bristol) as well as cost encourages driving. 21. Concern that there is no provision for safe walking and Active Travel routes. 22. Concern that Chepstow is overdeveloped and will become a commuter town with no sense of community. 23. Congestion is putting visitors off coming to Chepstow and supporting the shops and food outlets, resulting in a disappointing level of shopping. 24. Concerns that the sewage system on Pwllmeyric Hill has significant impact on mountain stream with regular raw sewage outfall in the river. 25. Concerns that the land floods frequently. 26. Plan claims houses will be built as net carbon zero ready, however, no recent developments have been built to the high environmental standards we can now achieve. 27. Responders state that the Council's Integrated Sustainability Appraisal makes it clear that development anywhere in Chepstow will make current traffic and pollution issues worse, with the (WeITAG) study demonstrating that the High Beech roundabout is already at full capacity. 28. Concern that growth figures conflict with WG advice to limit number to a miximum of 4275 new houses and exceed this target by 40%.	19. 2 Private Individuals 20. 3 Private Individuals 21. 5 Private Individuals 22. 4 Private Individuals 23. 1 Private Individual 24. 1 Private Individual 25. 1 Private Individual 26. 1 Private Individual 27. 2 Private Individuals 28. 2 Private Individuals
LPA Response	Comments noted. Site not progressing as insufficient information has been submitted in relation to demonstrating the viability and deliverability of the site. The site is within a Green Wedge and would also have negative ecology impact due to the ancient woodland priority habitat within the site.	
LPA Recommendation	This site will not be allocated in the Deposit RLDP.	

Candidate Site: CS0154 Land to the north of M48, Chepstow		Representor:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Green. No recorded or known archaeological or historic environment issues. Existing disturbance from M4 construction and landscaping. 2. Support for the site as it's near the motorway and bring additional employment to the area. 3. Concern that development would erode the green wedge between Mathern and Bulwark. 4. Objection to developing Green field sites when there are brownfield sites within the county. 5. A responder feels that the green belt around Chepstow, which contains a well used public footpath, would be compromised. 6. Responders state that the proposed areas form the gateway to the Wye Valley which attracts visitors. Development would ruin views of the AONB. 7. A responders feels that no development should go ahead until a bypass has been provided and substantial improvements to High Beech roundabout. 8. Concerns that access to the site will be difficult and dangerous for pedestrians. 9. Concerns that traffic congestion within Chepstow, particularly Highbeech roundabout and Hardwick Hill, is at unacceptable levels. Any incidents or planned closures cause excessive queues. 10. Concerns that Chepstow is a Designated Air Quality Management Area with high, potentially illegal, levels of air pollution. 11. Development in Gloucestershire, and the wider community, impacts traffic levels in Chepstow and demand for services. 12. Concerns that local infrastructure and services are already overstretched with no capacity to serve this site. Local roads are congested, public transport is poor, schools are oversubscribed, it's difficult to get a GP appointment, no spaces available at NHS dentists, no longer a local hospital facility. Shortage of leisure and community facilities and no cultural facilities such as a theatre or cinema. 13. Responders state that there is no public transport serving the site. 14. Responders state that the Council's Integrated Sustainability Appraisal makes it clear that development anywhere in Chepstow will make current traffic and pollution issues worse, with the (WelTAG) study demonstrating that the Highbeech roundabout is already at full capacity. 15. Cllr Louise Brown questions whether there is need for further hotel accommodation.	1. Glamorgan Gwent Archaeological Trust Ltd 2. 9 Private Individuals 3. Mathern Community Council, Cllr Louise Brown, 1 Private Individual 4. 2 Private Individuals 5. 1 Private Individual 6. 1 Private Individual 7. Cllr Louise Brown 8. Mathern Community Council, Cllr Louise Brown, 1 Private Individual 9. 5 Private Individuals 10. 4 Private Individuals 11. 1 Private Individual 12. Mathern Community Council, 8 Private Individuals 13. Mathern Community Council, 1 Private Individual 14. 1 Private Individual 15. Cllr Louise Brown
LPA Response	Comments noted. While internal and external consultee comments were obtained on tourism sites, the proposed tourism policy approach in the Deposit Plan more appropriately allows for consideration of sustainable tourism related proposals, including beyond identified settlement boundaries. It is therefore not considered appropriate/necessary to identify site specific tourism related allocations in the RLDP.	
LPA Recommendation	This site will not be allocated in the Deposit RLDP.	

Candidate Site: CS0260 South of J2 M48 (Option 1: Hotel & Employment)		Representor:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red. A desk based assessment and geophysical survey prior to any determination of an application would inform mitigation which may include further pre-determination work. 2. Objection to developing greenfield sites when brownfield sites are available in the county. 3. Concern that the proposed areas form part of the gateway to the Wye Valley, which attracts visitors, and the areas are close to an AONB. 4. Concern for the impact the increase in traffic will have on Chepstow which is already suffering from traffic congestion and high levels of air pollution. 5. Planning proposals in Gloucestershire will have a detrimental effect on Chepstow. 6. Responders state that public transport is not a viable option for many people – buses are infrequent and stop early and there are no direct trains to Bristol increasing use of the car. 7. Support for the site due to it's location close to the motorway and for the additional employment it may bring.	1. Glamorgan Gwent Archaeological Trust Ltd 2. 1 Private Individual 3. 1 Private Individual 4. 4 Private Individual 5. 2 Private Individual 6. 2 Private Individual 7. 4 Private Individuals
LPA Response	Comments noted. A separate Candidate Site submission for Mixed Use: Petrol Station (Sui Generis), Drive Thru (A1/A3) and Employment (B1/B2/ B8) has been submitted please see CS0261 for further details.	
LPA Recommendation	See response to CS0261.	

Candidate Site: CS0261 South of J2 M48 (Option 2: Petrol Station, Drive Thru and Employment)		Representor:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red. A desk based assessment and geophysical survey prior to any determination of an application would inform mitigation which may include further pre-determination work. 2. Objection to developing greenfield sites when brownfield sites are available in the county. 3. Concern that the proposed areas form part of the gateway to the Wye Valley, which attracts visitors, and the areas are close to an AONB. 4. Concern for the impact the increase in traffic will have on Chepstow which is already suffering from traffic congestion and high levels of air pollution. 5. Planning proposals in Gloucestershire will have a detrimental effect on Chepstow. 6. Responders state that public transport is not a viable option for many people – buses are infrequent and stop early and there are no direct trains to Bristol increasing use of the car. 7. Responder states that there are already 3 petrol stations in Chepstow so another is not needed. 8. Concerns that a drive through would only increase traffic, pollution and littering. 9. Support for the site due to its location close to the motorway and for the additional employment it may bring.	1. Glamorgan Gwent Archaeological Trust Ltd 2. 1 Private Individual 3. 1 Private Individual 4. 4 Private Individual 5. 2 Private Individual 6. 2 Private Individual 7. 1 Private Individual 8. 1 Private Individual 9. 4 Private Individuals
LPA Response	Comments noted. The Site has recently gained planning permission (DM/2022/01155) for the non-B use suis generis use of a Petrol Station and Drive Thru facility. Overall, the remaining employment land at the site provides an opportunity for B use employment land within an already established and protected industrial site.	

LPA Recommendation	It is therefore proposed to allocate the site for B1,B2,B8 employment use as set out in Policy EA1, with the site specific reference EA1d Newhouse Industrial Estate, Chepstow.

Monmouth

Candidate Site: CS0006 Land at Osbaston Road

		Representor:
	No responses received	
LPA Response	Comments noted. While internal and external consultee comments were obtained on this Candidate Site submission, it relates to a use more appropriately considered through the policy approach to community and recreation facilities adjoining identified settlement boundaries. It is therefore not considered appropriate/necessary to identify site specific community facility related allocations in the RLDP.	
LPA Recommendation	This site will not be allocated in the Deposit RLDP.	

Candidate Site: CS0051 Land at Croft y Bwla

		Representor:
	No responses received	
LPA Response	Comments noted. Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements. Landscape impact and highway concerns have also been raised in relation to the site's allocation given the large scale of the site. Overall, there are considered to be more suitable sites available in Monmouth.	
LPA Recommendation	This site will not be allocated in the Deposit RLDP.	

Candidate Site: CS0074 Land rear of The Royal Oak

		Representor:
	No responses received	
LPA Response	Comments noted. The small-scale nature of the site does not justify an allocation in the Plan. Further consideration will be given to the site as part of the settlement boundary review.	
LPA Recommendation	This site will not be allocated in the Deposit RLDP.	

Candidate Site: CS0076 West of Rockfield Road, Monmouth

		Representor:
	1. Responder does not support the filtering out of the site due to CIRIA SuDS information released and to view their formal representations for further information.	1. Hallam Land Management Ltd.

LPA Response	Comment noted. Part of this Candidate Site submission has extant planning permission for 70 dwellings. The remainder of the site sits neatly within a gap between the permitted site to the east, residential development to the south and west and consequently has limited landscape impact. While the site is Best and Most Versatile agricultural Land, the principle of development in this location has been established through the permission of the adjacent site. The site benefits from good access to a range of services including a primary school, open space and neighbourhood centre. The site also meets key policy requirements, including 50% affordable housing and net zero carbon homes, demonstrating its viability and deliverability.
LPA Recommendation	It is proposed to allocate the site for 60 dwellings with site specific policy requirements set out in Policy HA6 Land at Rockfield Road, Monmouth.

Candidate Site: CS0078 Croft y Bwla Farm, Monmouth	Representor:
1. Responder does not support the filtering out of the site due to CIRIA SuDS information released and to view their formal representations and Brookbanks Nutrient Neutrality Assessment for further information. 2. Responder provides a summary of their Nutrient Neutrality Assessment. The summary notes that proposals for 300 dwellings at the site can be self-sufficient in becoming Nutrient Neutral in line with NRW guidance. 3. The summary states that the proposed development will result in a positive TP budget that will require mitigation to be delivered, the summary includes mitigation proposals as such: Proposed SuDS features for surface water runoff, foul water discharge treatment and a constructed wetland suggested to treat effluent.	1. Taylor Wimpey 2. Taylor Wimpey 3. Taylor Wimpey

LPA Response	Comments noted. Site is not allocated as there is sufficient and more suitable land available for residential development within the primary settlement of Monmouth to accommodate its housing need.
LPA Recommendation	This site will not be allocated in the Deposit RLDP.

Candidate Site: CS0099 Land at Drybridge Farm	Representor:
No responses received	

LPA Response	Comments noted. Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements. Landscape impact and heritage concerns have also been raised in relation to the site's allocation.
LPA Recommendation	This site will not be allocated in the Deposit RLDP.

Candidate Site: CS0136 Land at former Poultry Units at Rockfield Road	Representor:
No responses received	

LPA Response	Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability for residential uses in accordance with key policy requirements. The whole site is located in flood zone which would not be suitable for highly vulnerable development. Therefore, this site will not be allocated in the RLDP for mixed-use residential and employment use. A separate Candidate Site submission for employment use has been submitted – please see CS0272 for details.

LPA Recommendation	See response to CS0272 for details.

Candidate Site: CS0151 Former Troy Rail Yard, Monmouth	Representor:
1. Responder notes the history of promotion of the site through the previous stages of the RLDP process, and the recommendation for the site not to progress to the next stage as the site is in the Upper River Wye catchment area, requires an FCA complying with the new TAN15 guidelines, and relates to a brownfield site development that is not permitted in area of Zone 3. 2. Responder acknowledges the Preferred Strategy seeks to make no new allocations but believes provisions should be made for delivering sustainable growth across the entire plan period and beyond. Responder quotes Planning Policy Wales (Edition 11) reaffirming that planning authorities should take the lead on previously developed land, considering and identifying the interventions necessary to assist in its delivery. 3. Responder provides a completed FCA for the site compliant with the new TAN15 guidelines. Responder notes the site is at risk of flooding from Zone 2 and Zone 3 but that no developments will be proposed in the areas at risk. There is a marginal surface water and small watercourse risk present in parts of the site, but these are outside of the property and site access routes, therefore complying with TAN15 guidelines. The development will not increase the risk of flooding elsewhere as adequate attenuation will be designed for events up to and including the 1-in-100yr, and a foul pumping station will be used to manage foul flows which will be positioned outside of flood Zone 2 and Zone 3. 4. Responder believes the site should be incorporated into the settlement boundary of Monmouth.	1. 1 Private Individual 2. 1 Private Individual 3. 1 Private Individual 4. 1 Private Individual
LPA Response	Comments noted. Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements. Approximately a third of the site is located in flood zone which would not be suitable for highly vulnerable development.
LPA Recommendation	This site will not be allocated in the Deposit RLDP.

Candidate Site: CS0189 Land at Tudor Road, Monmouth	Representor:
1. Significant progress has been made on technical work and investigating a resolution to the phosphate constraint in Monmouth, by site promoter and responder Edenstone, noting that pre-application negotiations have taken place. 2. Through pre-application and candidate site submissions, Edenstone believe their client demonstrates that a scheme for 58 dwellings can be delivered successfully.	1. Edenstone 2. Edenstone
LPA Response	Comments noted. his site was allocated in the Adopted LDP, however, phosphates prevented its development in coming forward. In view of DCWW's planned improvements at the Monmouth Wastewater Treatment Works by 31st March 2025, a planning application has been submitted and is currently being considered. The site performs well against the site search sequence, with excellent links to a primary school, local shop/post office and open space. A significant proportion of the site is also identified as being non-BMV land (65%), which performs well in a Monmouthshire context. The site also meets key policy requirements, including 50% affordable housing and net zero carbon homes, demonstrating its viability and deliverability.	
LPA Recommendation	It is proposed to allocate the site for approximately 50 dwellings with site specific policy requirements set out in Policy HA8 Land at Tudor Road, Wyesham.	

Candidate Site: CS0216 Land at Hereford Road	Representor:
No responses received	
LPA Response	Site is not allocated as there is sufficient and more suitable land available for residential development within the primary settlement of Monmouth to accommodate its housing need.
LPA Recommendation	This site will not be allocated in the Deposit RLDP.

Candidate Site: CS0271 Land at Vauxhall Fields	Representor:
No responses received	
LPA Response	Site is not allocated as there is sufficient and more suitable land available for residential development within the primary settlement of Monmouth to accommodate its housing need.
LPA Recommendation	This site will not be allocated in the Deposit RLDP.

Candidate Site: CS0272 Land at former Poultry Units at Rockfield Road	Representor:
No responses received	
LPA Response	While located in floodplain, this relates to a brownfield site with extant planning permission for B1 employment use, the proposed use would reflect the planning permission and therefore would not be contrary to TAN15.
LPA Recommendation	It is therefore proposed to allocate the site for B1 employment use as set out in Policy EA1, with the site specific reference EA1b Poultry Units, Rockfield Road, Monmouth.

Candidate Site: CS0274 Land North of Wonastow Road, Monmouth	Representor:
1. Richborough Estates, the site promoter, confirms through the council's high-level assessment that the site is not subject to any fundamental constraints that cannot be mitigated. 2. Part of the site is subject to surface water flooding, but developments would mitigate this issue and improve drainage, resulting in a downstream benefit through a reduction in peak flow run-off. 3. The site is shown, through the high-level assessment, to not be compatible due to it location within the Upper River Wye catchment area. If the council's position on phosphates change, the responder believes the site represents the most appropriate direction for future growth.	1. Richborough Estates 2. Richborough Estates 3. Richborough Estates
LPA Response	Comments noted. Site is not allocated for a mixed use residential and employment site as there is sufficient and more suitable land available for residential development within the primary settlement of Monmouth to accommodate its housing need. Part of the site is, however, considered appropriate for B1/B2/B8 employment uses as it forms a logical extension to adjoining employment uses and would provide much needed employment land in Monmouth.

LPA Recommendation	It is therefore proposed to allocate the site for B1, B2, B8 employment use as set out in Policy EA1, with the site specific reference EA1c Land north of Wonastow Road, Monmouth.

Candidate Site: CS0275 Land off Wonastow Road Industrial Estate	Representor:
No responses received	
LPA Response	While located within defended flood zone, the site is greenfield and the proposal is therefore contrary to provisions set out in the latest National Planning Policy in relation to Flooding.
LPA Recommendation	This site will not be allocated in the Deposit RLDP.

Candidate Site: CS0277 Land at Drewen Farm, Monmouth	Representor:
1. Responder and developer of the site, Vistry Group, is in favour of the site and welcomes the development due to its partial inclusion in the adopted LDP and vicinity to a wide range of amenities that support the development. 2. Vistry Group has undertaken a range of initial surveys to inform the design proposals for the site and concluded that the site will be a viable and deliverable proposition. 3. Responder believes once the phosphates challenge has been overcome at Monmouth, the delivery of the site will provide a valuable contribution towards the housing needs of the county.	1. Vistry Group 2. Vistry Group 3. Vistry Group
LPA Response	Comments noted. This site was allocated in the Adopted LDP, however, phosphates prevented its development in coming forward. In view of DCWW's planned improvements at the Monmouth Wastewater Treatment Works by 31st March 2025 the site can now be progressed. The site performs well against the site search sequence, with good links to a primary school, neighbourhood centre, employment uses and open space.
LPA Recommendation	It is proposed to allocate the site for approximately 110 dwellings with site specific policy requirements set out in Policy HA7 Land at Drewen Farm, Monmouth.

Candidate Site: CS0292 Rhossili, Hadnock Road	Representor:
No responses received	
LPA Response	Site not progressing as significant concerns have been raised in relation to highway capacity and safety, along with ecological impact.
LPA Recommendation	This site will not be allocated in the Deposit RLDP.

Caerwent

Candidate Site: CS0009 Former MoD Training Centre, Caerwent	Representor:
1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red. A desk based assessment and geophysical survey prior to any determination of an application would inform mitigation, which may include further pre-determination work. 2. The site promotor states that the site is located on previously developed land. 3. Concerns regarding the provision of Doctors, Dentists, Telephone and Broadband. 4. Concerns regarding the provision of Primary and Secondary school places. 5. Concerns regarding the adequacy of sewage processing. 6. Concerns regarding surface water run off causing flooding. 7. The flood plains provide a natural reserve for wildfowl and such habitat loss would impact a SSSI 8. Poor local bus services with no service in the evening or on Sundays. 9. Better train service from Caldicot required plus a bus link to the station. 10. Concerns regarding an increase in traffic locally plus on the M4 and A48 around Larkfield, Chepstow. 11. Further development will destroy the look and feel of these peaceful rural villages.	1. Glamorgan Gwent Archaeological Trust Ltd 2. Edenstone 3. 2 Private individuals 4. 1 Private individual 5. 1 Private individual 6. 2 Private individuals 7. 1 Private individual 8. 1 Private individual 9. 1 Private individual 10. 2 Private individuals 11. 1 Private individual
LPA Response	Comments noted. It is proposed to allocate the site as mixed-use residential and employment (B1) allocation in the Deposit Plan. The allocation is a sustainably located edge of settlement site, which is previously developed land that performs well against the site search sequence, with no significant constraints identified on site that would prohibit its development. The site also meets key policy requirements, including 50% affordable housing and net zero carbon homes, demonstrating its viability and deliverability. The mixed-use development proposal which is allocated for 40 residential units and a minimum of 1ha of B1 employment land is considered to have associated job creation with opportunities to work and live together and promote accessibility and connectivity to the existing settlement of Caerwent and the wider Severnside Region. The site is not allocated for C2 (care home) /community use (D1) as the need for these uses was not evidenced in this location.
LPA Recommendation	It is proposed to allocate the site for 40 dwellings with site specific policy requirements set out in Policy HA9 Land at Former MOD, Caerwent.

Candidate Site: CS0017 Village Farm, Llanvair Discoed (Caerwent ward)		Representor:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Amber. Site c35m north of the Scheduled Monument of 13th century Llanfair Discoed Castle MM047, Roman finds recorded in the vicinity. Development could be mitigated by condition, in accordance with an agreed Written Scheme of Historic Environment Mitigation.	1. Glamorgan Gwent Archaeological Trust Ltd
LPA Response	Comment noted. Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements. The site also is not able to connect to the public sewerage system and is within a groundwater Source Protect Zone (SPZ), meaning that its development would result in an unacceptable impact on the water environment.	
LPA Recommendation	This site will not be allocated in the Deposit RLDP.	

Candidate Site: CS0071 Land at Slough Farm, Caerwent		Representor:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red. A desk-based assessment and geophysical survey prior to any determination of an application would inform mitigation, which may include further pre-determination work 2. Landscape sensitivity to residential development is high/medium. 3. The area is classified as predictive grade 1 BMV land. 4. The site is located a significant distance from all day to day services and responders are concerned that there is sufficient provision of services including Doctors, Dentists, Telephone, Broadband and school places. 5. The site's relationship with the green belt designated under Policy 34 of Future Wales is also a consideration. 6. Concern regarding underlying water courses and the risk of sink holes. 7. Concerns re flooding and water run off entering the nearby SSSI and the danger of pollution of the SSSI by grey water. 8. A responder states that the Nedern valley should be preserved as a green biodiversity corridor of significance as recognised by the SSSI. 9. Concerns regarding the adequacy of sewage processing. 10. Poor local bus services with no service in the evening or on Sundays. 11. Better train service from Caldicot required plus a bus link to the station. 12. Concerns re an increase in traffic. 13. Further development will destroy the look and feel of these peaceful rural villages of Crick and Caerwent.	1. Glamorgan Gwent Archaeological Trust Ltd 2. Edenstone plus 2 Private Individuals 3. Edenstone 4. Edenstone plus 2 Private Individuals 5. Edenstone 6. 1 Private Individual 7. 2 Private Individual 8. 1 Private Individual 9. 1 Private Individual 10. 1 Private Individual 11. 1 Private Individual 12. 1 Private Individual 13. 1 Private Individual
LPA Response	Comments noted. Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements. Ecology concerns have also been identified.	
LPA Recommendation	This site will not be allocated in the Deposit RLDP.	

Caldicot

Candidate Site: CS0007 Pill Row, Caldicot

		Representor:
	1. Responder notes that employment land adjacent to Pill Row and Severn Bridge Industrial Estate has been omitted. An existing planning application has been submitted and First Investments is providing answers to questions for the Planning Committee in the coming months. 2. Owner of land adjacent to Pill Row has concerns re their land not being taken up as a candidate site for employment, when First Investments, who submitted their land, has had their site - land adjacent to Severn Bridge Industrial Estate – designated in the existing LDP. Responder requests that their land is included in the revised LDP as a candidate site for employment. 3. FI Real Estate Management Ltd strongly object to the removal of the site through the High-Level Assessment to progress to Stage 3A. FIREM object to the methodology in the Candidate Site Assessment Methodology that has been applied, disagreeing that the site cannot be mitigated for flood risk and that there should be an allowance to use a current planning application as evidence as part of the sieving exercise. 4. FIREM note that the proposed changes to TAN15 relate to providing a more flexible approach with regard to less vulnerable development, such as employment use, and believe this Candidate Site, and potentially others, should be carried forward into Stage 3A assessment. Because of the proposed changes, FIREM believe the Council should pause to allow the process to catch-up and revise the Methodology to re-run the assessments and should include a more flexible interpretation of the site opportunities that land, such as CS0007, can play for future development when the site benefits from flood defences. 5. In the view of FIREM, the associated evidence of the Employment Land Report Update would realise a different outcome to assessment of Policy SAE1h and retention of the employment land allocation.	1. Private Individual x 1 2. Private Individual x 1 3. FI Real Estate Management Ltd 4. FI Real Estate Management Ltd 5. FI Real Estate Management Ltd
LPA Response	Comments noted. Proposal is contrary to provisions set out in National Planning Policy in relation to Flooding. As such, the site is not suitable for development and has not progressed further in the candidate site assessment process.	
LPA Recommendation	This site will not be allocated in the Deposit RLDP.	

Candidate Site: CS0067 East & West Church Road, Caldicot

		Representor:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as RED – A previous response to pre-planning consultation recommended desk-based assessment and geophysical survey prior to any determination of an application would inform mitigation, which may include pre-determination work; our understanding of the site has not changed since then, and our recommendation remains the same.	1. Glamorgan Gwent Archaeological Trust Ltd
LPA Response	Comment noted. The site is considered to be of small scale and would have limited impact on achieving the required quantum of development in this area. Site is not allocated as there is sufficient and more suitable land available for residential development within the Severnside area to accommodate its housing need.	

LPA Recommendation	This site will not be allocated in the Deposit RLDP.

Candidate Site: CS0129 Dewstow Village, Former Dewstow Golf Course	Representor:
1. Glamorgan Gwent Archaeological Trust Ltd assess the site as RED – A previous response to the LDP consultation recommended desk-based assessment and geophysical survey prior to any determination of an application would inform mitigation, which may include further pre-determination work; our understanding of the site has not changed since then, and recommendation remains the same. 2. Site promoter provides support for the Dewstow Village site noting: • The site has capacity for 580 to 815 homes that could be delivered over a number of phases. • If the upper number of homes were progressed the scheme would also be able to support a local centre and an employment work hub. • Masterplan submitted identifies access routes through the site and access for vehicles. • Site has benefits of existing rights of way and links that can be enhanced with good access to primary schools. • Opportunity to locate outdoor play space as well as areas of sustainable urban drainage. • Comprises two land parcels offering flexibility in delivery and quantum of development.	1. Glamorgan Gwent Archaeological Trust Ltd 2. Redrow Homes

LPA Response	Comments noted. This site is considered too divorced from the settlement of Caldicot, as it is physically separated by the M48. Concerns have also been raised in relation to highways and landscape impact. There are considered to be more suitable sites available in this area.
LPA Recommendation	This site will not be allocated in the Deposit RLDP.

Crick

Candidate Site: CS0091 Caerwent Depot, Crick	Representor:
1. Glamorgan Gwent Archaeological Trust Ltd assess the site as AMBER – Whilst the site has been disturbed by its former use, the route of a Roman road is adjacent to the site, and a Scheduled Monument (MM151 Crick Round Barrow), a burial mound is 100m W, development could be mitigated by condition, in accordance with an agreed Written Scheme of Historic Environment Mitigation. 2. Concerns re drainage, flooding, and sewerage in the area. Crick has no mains drainage system and flooding of nearby fields and properties has occurred in the recent past due to surface run off. The Crick Brook is already considered to have a flood plain within the hamlet environs and has recently caused flooding, making it unsuitable for additional water disposal. Carefully considered SuDs will need to find reliable means to deal with surface water drainage and deal with site constraints. Without	1. Glamorgan Gwent Archaeological Trust Ltd 2. 6 Private Individuals 3. 6 Private Individuals 4. 5 Private Individuals 5. 3 Private Individuals 6. 3 Private Individuals

	introducing a sewer system to Crick, the treated effluent from a development of this size cannot be dealt with, even with an on onsite sewage treatment plant (STP). An existing STP from the nursing home discharged into Crick Brook repeatedly fails to function effectively, therefore increasing concern for a development of this size. Distance from site to drainage point, sewage system and watercourse, dramatically reduces feasibility of the site. Developing on this site will greatly intensify existing issues. 3. Concerns re road infrastructure, traffic, and access. Significant changes to the current access will be required in order to maintain the safety of residents and visitors entering and leaving the site. Due to current and newly completed developments the area has seen a significant increase in traffic, with motorist opting to use smaller alternate routes increasing traffic in those areas. Current roads infrastructure already struggling, therefore new routes will worsen the issue causing children to be late for school, commuters late for work and an increase in pollution. Lack of amenities in the area increases traffic. Responders concerned that there is no obvious engineering solution to the issues faced. Concerns that a large proportion of residents buying homes in the new developments will be commuters to Bristol, increasing traffic and producing very little benefit to the Welsh economy. 4. Local services such as telephone, broadband, schools, doctors, dentists, and other NHS services are at max capacity, oversubscribed and have huge waiting lists, therefore an increase in residents will only worsen issues. Concerns that there have been no provisions made to improve these facilities. 5. Responders concern re the lack of amenities and local facilities to service the residents in the existing area, expecting worsening conditions after new developments. Public Transport in Crick is poor, running infrequently and not at times needed by those who commute. Service provisions will need to be made to facilitate this development. Responders concerned as Public Transport is not sufficient enough for day-to-day needs, yet they're being encouraged to reduce car usage in favour of Public Transport. 6. Concern re the scale of the proposed development which would double the number of dwellings, impacting on the nature and character of the hamlet. Chepstow and the surrounding areas have been extensively developed, responders noting that these developments will represent the urbanisation of rural settlements, subsuming Crick into Caldicot. Responders object to the change in character which runs counter to the principals of Future Wales 2040. 7. Responders note that the Crick Brook flows directly into the Nedern wetland area of SSSI status. Concern re additional housing in the area reducing green open space and countryside. The floodplains affecting the site provide a natural reserve for wildfowl, therefore development would lead to habitat loss and impact on the SSSI. 8. Responders note lack of jobs in the local area. 9. Concern that proposed net zero developments and the increased use of electric vehicles will not be enough to prevent the developments from having an effect on nature, flooding, and the general health of those who live in the area. 10. Responder notes that the site has had much contamination over the area and would need substantial clearing and cleaning. 11. Responder supports site of previously developed land in Crick. 12. Site Promoters for Land South of Newport Road, Magor, Edenstone, note the site to be located on previously developed land and are against development for the following reasons. • Abnormal costs associated with the delivery of the site owing to it being previously developed. • The site's location adjacent to Crick is far less sustainable when compared to other location in Severnside.	7. 4 Private Individuals 8. 1 Private Individual 9. 1 Private Individual 10. 1 Private Individual 11. 1 Private Individual 12. Edenstone

	• It is noted that whilst previously developed land should be prioritised above greenfield land when allocating sites, it is not considered sound to prioritise brownfield land which is far less sustainably located when compared with sustainably located greenfield sites such as the Land South of Newport Road, Magor.	
LPA Response	Comments noted. Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability for residential uses in accordance with key policy requirements. Furthermore, the site is unable to connect to the public sewerage system and is located within a groundwater Source Protection Zone. As such, development in this location would as a consequence result in an unacceptable impact on the water environment.	
LPA Recommendation	This site will not be allocated in the Deposit RLDP.	

Magor with Undy

Candidate Site: CS0038 Land to the west of Wales One Business Park, Magor

		Representor:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red. A desk based assessment and geophysical survey prior to any determination of an application would inform mitigation which may include further pre-determination work.	1. Glamorgan Gwent Archaeological Trust Ltd
LPA Response	This site has now been constructed under planning application DM/2022/00634.	
LPA Recommendation	The site is allocated as a protected employment site under Policy EA2 with the site specific reference of EA2s.	

Candidate Site: CS0206 South of Newport Road, Magor

		Representor:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red. Geophysical survey in 2008 on part of the site identified potential archaeological features. 2. The site sponsor, Edenstone, have submitted extensive information and state that the development will provide: • A range and choice of housing (including market housing, affordable housing and potential for bungalows) along with a care home. • Good quality open spaces, trim trails and community allotments for the benefit of existing and proposed residents. • Green Infrastructure with biodiversity benefits (delivering a biodiversity enhancement). • Economic benefits as the proposed development will generate jobs and create additional tax revenue. 3. A responder states that the site is a valuable green space which has been used by the community to walk dogs for well over 20 years; around 100 dogs use this field on a daily basis. 4. A responder feels that local leisure facilities are already inadequate for the current population.	1. Glamorgan Gwent Archaeological Trust Ltd 2. Edenstone 3. 1 Private Individual 4. 1 Private Individual 5. 1 Private Individual 6. 1 Private Individual 7. 1 Private Individual 8. 1 Private Individual 9. 1 Private Individual 10. 1 Private Individual

	5. Concerns that health services cannot copy with a further increase in population considering the new developments at Vinegar Hill, Portskewett and Caldicot as well. 6. Concerns that local schools are full/close to capacity. 7. Concerns re public transport; the local bus service is infrequent, with no link to Severn Tunnel station and no buses on a Sunday. The walkway train station at Magor is needed. 8. Concerns re parking in Magor village particularly during school drop off/pick times. This site is too far from the schools for Key Stage 1 children to walk to. 9. Traffic concerns as any incident on the M4 has a severe impact as any traffic trying to leave the village cannot move. 10. Flooding and excess surface water on the site is also a cause for concern. Improvements have been made but still the field in under water at times.	
LPA Response	Site is not allocated as there is sufficient and more suitable land available for residential development within Severnside to accommodate its housing need.	
LPA Recommendation	This site will not be allocated in the Deposit RLDP.	

Candidate Site: CS0211 Land at Rockfield Road, Undy

		Representor:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red. A desk based assessment and geophysical survey prior to any determination of an application would inform mitigation which may include further pre-determination work.	1. Glamorgan Gwent Archaeological Trust Ltd
LPA Response	Site is not allocated as there is sufficient and more suitable land available for residential development within Severnside to accommodate its housing need.	
LPA Recommendation	This site will not be allocated in the Deposit RLDP.	

Candidate Site: CS0228 Land off Green Moor Lane, Magor

		Representor:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red. A desk based assessment and geophysical survey prior to any determination of an application would inform mitigation which may include further pre-determination work. 2. Concerns regarding increase in traffic during construction and afterwards. Lorries already cause problems blocking the entrance to Llandevenny Lane. 3. Concerns regarding noise and lights during construction and when site in use. 4. Concerns regarding flooding as responder currently has issues with flooding coming off the land. 5. Responder states that screening would be needed to block out development. 6. Concerns for the diverse wildlife currently in the area.	1. Glamorgan Gwent Archaeological Trust Ltd 2. 1 Private Individual 3. 1 Private Individual 4. 1 Private Individual 5. 1 Private Individual 6. 1 Private Individual
LPA Response	Site to be allocated as an employment site in the Deposit Plan. The site is part of the southern section of CS0258 (Quay Point). No fundamental development constraints have been identified as part of the assessment process. Its allocation will provide much needed employment land in the Severnside region.	

LPA Recommendation	It is therefore proposed to allocate the site for B1,B2,B8 employment use as set out in Policy EA1, with the site specific reference EA1f Quay Point, Magor.

Candidate Site: CS0258 Quay Point (Land south of Magor Brewery)	Representor:
1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red. A desk based assessment and geophysical survey prior to any determination of an application would inform mitigation which may include further pre-determination work. 2. Concerns re the siting of a Hydrogen Plant close to a dwelling. 3. Concerns regarding increase in traffic during construction and afterwards. Lorries already cause problems blocking the entrance to Llandevenny Lane. 4. Concerns regarding noise and lights during construction and when site in use. 5. Concerns regarding flooding as responder currently has issues with flooding coming off the land. 6. Responder states that screening would be needed to block out development. 7. Concerns for the diverse wildlife currently in the area.	1. Glamorgan Gwent Archaeological Trust Ltd 2. 1 Private Individual 3. 1 Private Individual 4. 1 Private Individual 5. 1 Private Individual 6. 1 Private Individual 7. 1 Private Individual

LPA Response	Site to be allocated as an employment site in the Deposit Plan. No fundamental development constraints have been identified as part of the assessment process. Its allocation will provide much needed employment land in the Severnside region.
LPA Recommendation	It is therefore proposed to allocate the site for B1,B2,B8 employment use as set out in Policy EA1, with the site specific reference EA1f Quay Point, Magor.

Rogiet

Candidate Site: CS0168 Adjacent to Merlin Close, Rogiet	Representor:
1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red. The HER notes a coin hoard of Roman date was found within the area, and remains of a Roman building excavated adjacent to the site, and a well to the south. An archaeological desk-based assessment and geophysical survey prior to any determination of an application would inform mitigation, which may include further pre-determination work. 2. The site promotor, Manor Farm Partnership, makes the following supporting comments: • We believe this site is technically deliverable, viable and developable, meeting the requirements of the Preferred Strategy. • We believe the site could potentially be delivered subject to a suitable flood consequence assessment report. • The site would provide 50% affordable housing, enhance active travel links, provide green open space for public access and provide a high quality settlement edge. 3. Concerns regarding mineral resources – the site is currently constrained by mineral safeguarding. 4. Responders state that the site has been graded as 1 for BMV agricultural land.	1. Glamorgan Gwent Archaeological Trust Ltd plus 17 Private Individual 2. Manor Farm Partnership 3. 19 Private Individual 4. 19 Private Individual 5. 20 Private Individual 6. 1 Private Individual 7. 18 Private Individual 8. 7 Private Individual

	5. Responders state that the site is currently classified as a Green Wedge constraining any development. The site also adjoins an existing conservation area as designated in the current LDP. 6. A responder states that Great Crested Newts have been seen in the area, as recently as 2022 (video evidence may be available) 7. Concerns that the site is classified, by NRW, as adjoining an area at risk of flooding from rivers and sea and the site itself is a high surface water risk. 8. Concerns regarding ever increasing traffic issues, noise and pollution levels which would have a negative impact on the peaceful village of Rogiet. 9. General objection to the site being included in the LDP and the affect development would have on the separation between Rogiet and Undy as well as the visual impact. 10. Concerns regarding access to services and amenities such as dentists, medical care, shops, pubs and school places; few services are provided within Rogiet requiring residents to travel to other villages. 11. Concerns that the site is significantly higher that the adjacent houses; any development would block natural light and affect privacy and enjoyment of those homes. 12. General support for additional development around Rogiet.	9. 2 Private Individual 10. 5 Private Individual 11. 2 Private Individuals 12. 1 Private Individual
LPA Response	Comments noted. Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements. A significant proportion of the site is located in flood zone which would not be suitable for highly vulnerable development. The is also site within a green wedge designation where there is a presumption against new built development.	
LPA Recommendation	This site will not be allocated in the Deposit RLDP.	
Candidate Site: CS0253 Ifton Manor (Site A), Rogiet		Representor:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red. A desk based assessment and geophysical survey prior to any determination of an application would inform mitigation which may include further pre-determination work. 2. Responder states that this land is agricultural for farming and grazing livestock. 3. Responder states that the land is used by the community for walking and exercise (both for residents and pets). 4. Concerns that this 'green wedge' is the final distinction between Rogiet and Caldicot and development would see the smaller village subsumed by the larger town. 5. Traffic concerns as the B4245 is the only route through the village and subject to long delays when incidents happen on the network; adding more homes will create even more reliance on this single point of failure. 6. Environment/biodiversity concerns as this area supports a vast array of local wildlife, some of which is endangered. It also serves as a release site for Hedgehog Helpline Cymru and is developing a healthy population of this endangered species. 7. Responders raise concerns over the history of flooding of the area which often renders the site impassable with several feet of water in places. This flooding can reach within metres of existing properties so there are concerns over the impact development would have on the flooding risk to these homes. Photographs submitted as evidence. 8. The site promotor, Taylor Wimpey PLC (Savills), has submitted extensive information to support the site and makes the following points:	1. Glamorgan Gwent Archaeological Trust Ltd 2. 1 Private Individual 3. 1 Private Individual 4. Edenstone plus 1 Private Individual 5. 1 Private Individual 6. 1 Private Individual 7. Edenstone plus 1 Private Individual 8. Taylor Wimpey PLC (Savills) 9. 1 Private Individual 10. 1 Private Individual 11. 1 Private Individual

	• There is a clear aspiration, from WG and MCC, to deliver an improved vehicular linkage from either the B4245 and/or the M48 to Severn Tunnel Junction Railway Station and the indicative masterplan makes an allowance for land to provide this. • The site is considered to have 'High' value in terms of ecological connectivity but the site does not meet the tests for Sites of Importance for Nature Conservation and is suitable for development in part, however, extensive portions of the site cannot be developed due to flood risk so would be used for biodiversity mitigation, compensation and enhancement. • With regards to Active travel in a Transport Note, prepared by TPA, Ifton Manor Farm performs considerably stronger than Caldicot Eastwith regards to proximity to services, accessibility by public transport and connectivity to the existing active travel network. 9. A responder states that this additional strategic delivery will offset the scaling back of CS0251 to deliver overall housing need. 10. A responder states that the plan is silent on a new motorway junction on the M48 to link to STJ. The plan should set out clear support for this infrastructure and lobby WG accordingly. 11. A responder requests that car parking spaces per dwelling are reduced from 3 to 2 so as not to re-enforce reliance on the car.	
LPA Response	Comments noted. Site not progressing as it is designated as a green wedge in the RLDP where there is a presumption against new built development. and due to the scale of the proposal there are significant landscape concerns the proposal would have impacted on the openness of the green wedge land. The site also comprises 100% BMV land (38% of which relates to Grade 1 BMV). Overall, there are considered to be more suitable alternative sites in the Severnside area.	
LPA Recommendation	This site will not be allocated in the Deposit RLDP.	
Candidate Site: CS0254 Ifton Manor (Site B), Rogiet		Representor:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red. A desk based assessment and geophysical survey prior to any determination of an application would inform mitigation which may include further pre-determination work. 2. Responder states that this land is agricultural for farming and grazing livestock. 3. Responder states that the land is used by the community for walking and exercise (both for residents and pets). 4. Concerns that this 'green wedge' is the final distinction between Rogiet and Caldicot and development would see the smaller village subsumed by the larger town. 5. Traffic concerns as the B4245 is the only route through the village and subject to long delays when incidents happen on the network; adding more homes will create even more reliance on this single point of failure. 6. Environment/biodiversity concerns as this area supports a vast array of local wildlife, some of which is endangered. It also serves as a release site for Hedgehog Helpline Cymru and is developing a healthy population of this endangered species. 7. Responders raise concerns over the history of flooding of the area which often renders the site impassable with several feet of water in places. This flooding can reach within metres of existing properties so there are concerns over the impact development would have on the flooding risk to these homes. Photographs submitted as evidence. 8. The site promotor, Taylor Wimpey PLC (Savills), has submitted extensive information to support the site and makes the following key points:	1. Glamorgan Gwent Archaeological Trust Ltd 2. 1 Private Individual 3. 1 Private Individual 4. Edenstone plus 1 Private Individual 5. 1 Private Individual 6. 1 Private Individual 7. Edenstone plus 1 Private Individual 8. Taylor Wimpey PLC (Savills)

	• There is a clear aspiration, from WG and MCC, to deliver an improved vehicular linkage from either the B4245 and/or the M48 to Severn Tunnel Junction Railway Station and the indicative masterplan makes an allowance for land to provide this. • The site is considered to have 'High' value in terms of ecological connectivity but the site does not meet the tests for Sites of Importance for Nature Conservation and is suitable for development in part, however, extensive portions of the site cannot be developed due to flood risk so would be used for biodiversity mitigation, compensation and enhancement. • With regards to Active travel in a Transport Note, prepared by TPA, Ifton Manor Farm performs considerably stronger than Caldicot East with regards to proximity to services, accessibility by public transport and connectivity to the existing active travel network.	
LPA Response	Comments noted. The site has been promoted in association with the proposed residential/mixed-use development associated with CS0253 Ifton Manor Site A which has not progressed for the reasons set out above in response to CS0253.	
LPA Recommendation	This site will not be allocated in the Deposit RLDP.	
Candidate Site: CS0255 Land adj Ifton Industrial Estate, Rogiet		Representor:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Amber. HER notes human remains found at the quarry in the west of the estate, archaeological mitigation in the estate has not encountered any further archaeological deposits. The area is disturbed and if necessary, dependent on the changes, development could be mitigated by condition, in accordance with an agreed Written Scheme of Historic Environment Mitigation.	1. Glamorgan Gwent Archaeological Trust Ltd
LPA Response	Comment noted. The small-scale nature of the site does not justify an allocation in the Plan. Further consideration will be given to the site as part of the settlement boundary review.	
LPA Recommendation	This site will not be allocated in the Deposit RLDP.	
Candidate Site: CS0256 The Paddocks, Adj Rogiet Pool		Representor:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Green. No recorded or known archaeological or historic environment issues.	1. Glamorgan Gwent Archaeological Trust Ltd
LPA Response	Comment noted. The small-scale nature of the site does not justify an allocation in the Plan. Further consideration will be given to the site as part of the settlement boundary review.	
LPA Recommendation	This site will not be allocated in the Deposit RLDP.	

Secondary Settlements

Penperlleni

Candidate Site: CS0037 South Usk Rd, Penperlleni

		Representor:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red - Desk based assessment and geophysical survey prior to any determination of an application would inform mitigation, which may include further pre-determination work. 2. Support for the site (along with CS0280) stating the development is capable of sitting comfortably within its landscape setting with the Council's Landscape Sensitivity Study identifying the site as having the lowest landscape sensitivity of all of the candidate sites submitted in Penperlleni.	1. Glamorgan Gwent Archaeological Trust Ltd 2. Edenstone
LPA Response	Comments noted. Overall, the site performs well against the assessment methodology with no fundamental constraints identified. The site also meets key policy requirements, including 50% affordable housing and net zero carbon homes, demonstrating its viability and deliverability.	
LPA Recommendation	It is proposed to allocate the site for approximately 42 dwellings with site specific policy requirements set out in Policy HA12 Land west of Trem yr Ysgol, Penperlleni.	

Candidate Site: CS0138 Land at Goytre Farm, Penperlleni

		Representor:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red - The HER notes an area of agricultural estate management. An archaeological desk-based assessment and geophysical survey prior to any determination of an application would inform mitigation, which may include further pre-determination work. 2. Support for the site as Penperlleni within the Preferred Strategy is highlighted as a Tier 2 secondary settlement. The settlements proximity to the A4042/Usk Road ensures convenient access to the services, amenities and employment. The village is well catered for in terms of local amenities, services and buses to Newport, Cwmbran and Abergavenny which are all located within a short walk. The representor concludes that the site lies in a sustainable settlement that is not located within the Upper River Wye Catchment Area and is not impacted by the implications of the TAN15 flood map and states that there are no designations that cannot be carefully mitigated and accommodated for.	1. Glamorgan Gwent Archaeological Trust Ltd 2. Persimmon Homes East Wales
LPA Response	Comments noted. Site is not progressing to the Deposit Plan as there are landscape and ecological concerns particularly in relation to a significant proportion of the site being a designated Site of Importance for Nature Conservation (SINC). Overall, there are considered to be more suitable alternative sites in the area	
LPA Recommendation	This site will not be allocated in the Deposit RLDP.	

Candidate Site: CS0217 Land at Fairfield, Penperlleni		Representor:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red - The HER notes the site of a potential Medieval Manor house and possible remains. An archaeological desk-based assessment and geophysical survey prior to any determination of an application would inform mitigation, which may include further pre-determination work.	1. Glamorgan Gwent Archaeological Trust Ltd
LPA Response	Comment noted. Site is not progressing to the Deposit Plan as the site has a significant ecology constraint as the whole of the site is within a designated Site of Importance for Nature Conservation (SINC).	
LPA Recommendation	This site will not be allocated in the Deposit RLDP.	

Candidate Site: CS0279 Land West of Usk Road, Penperlleni		Representor:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red - The HER notes the site of a potential Medieval mill, channel, and other possible remains. An archaeological desk-based assessment and geophysical survey prior to any determination of an application would inform mitigation, which may include further pre-determination work. 2. The site promotor, Barratt and David Wilson Homes South Wales, has submitted extensive information in support of the site and make the following points: • The majority of the site is grassland which is considered in their Preliminary Ecological Appraisal to be of low ecological value. • The Flood Risk and Drainage Advice Note submitted previously concludes that the site is within Flood Zone 1 for Rivers and Sea and that development for housing is acceptable within this flood zone. • MCC's Environmental Health Assessment concludes that development of the site, for housing, is acceptable from an environmental health perspective. • MCC's Active Travel Assessment concludes that the site is suitable to be developed from an active travel perspective.	1. Glamorgan Gwent Archaeological Trust Ltd 2. Barratt and David Wilson Homes South Wales
LPA Response	Comments noted. Site is not progressing to the Deposit Plan as there are significant landscape concerns in relation to developing west of the A4042 which would significantly change Penperlleni's settlement pattern and valued landscape. There are also concerns regarding connectivity to facilities in the settlement due to the location on the opposite side of the A4042. Overall, there are considered to be more suitable alternative sites in the area.	
LPA Recommendation	This site will not be allocated in the Deposit RLDP.	

Candidate Site: CS0280 Land at Walnut Tree Farm, Penperlleni		Representor:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red - The HER notes the site of a potential early post-Medieval farmhouse and outbuildings shown on the Tithe of 1838. An archaeological desk-based assessment and geophysical survey prior to any determination of an application would inform mitigation, which may include further pre-determination work.	1. Glamorgan Gwent Archaeological Trust Ltd

	2. The site promotor, Edenstone, has submitted extensive information in support of the site. Key points include: • The site is sustainably located and could help to deliver the Council's 20 minute neighbourhood aspirations. • The site is close to the village centre and could encourage and support active travel travel. • The Council's Landscape Sensitivity Study identified the site as have the lowest landscape sensitivity of the candidate sites in Penperlleni. • On the basis of the technical assessments undertaken to date the promotor states that there are not considered to be any unresolvable constraints to the proposed development of the site.	2. Edenstone
LPA Response	Comments noted. Site is not progressing to the Deposit Plan as the site has a significant highway constraint as it has not been able to demonstrate safe pedestrian access and connectivity from the site to the village centre of Penperlleni. Overall, there are considered to be more suitable alternative sites in the area.	
LPA Recommendation	This site will not be allocated in the Deposit RLDP.	

Raglan

Candidate Site: CS0069 Raglan Enterprise Park		Representor:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as RED – Previous responses to consultation recommended desk-based assessment and geophysical survey prior to any determination of an application would inform mitigation, which may include further pre-determination work; our understanding of the site has not changed since then, and recommendation stays the same. 2. Responder in support of the site as its scale is appropriate for the village and the development would contribute to climate change initiatives and increase local employment. However, much care should be given to the development so that it meets its goals in relation to; future needs, community, environment, sustainability, and traffic production, otherwise consideration will be given to its objection. 3. Responder believes expansion of existing commercial estate at Little Castle Farm site would be more proactive, than allocating a new site to develop on prime agricultural land. CS0278 would be a better site for the development due to its access. Acknowledgment that site CS0278 is outside of village envelope but believes this is more important for residential sites not employment sites and is positive about the prospect of employment opportunities. 4. Responder objects to site and any other applications due to the delay in development of a previous 45 dwelling council approved residential site in Raglan.	1. Glamorgan Gwent Archaeological Trist Ltd 2. Raglan Community Council 3. 1 Private Individual 4. 1 Private Individual
LPA Response	Comments noted. It proposed to allocate approximately 1.5ha of land adjoining the existing Protected Employment site as a new employment allocation, allowing for an extension to the existing Enterprise Park and supporting job growth in the Raglan and wider area. No fundamental constraints were identified as part of the assessment process. The allocation also provides an opportunity to develop an off-grid employment site linked to the proposed adjoining ground mounted solar array.	

	It is also proposed to identify approximately 16ha of land to the west of the existing Raglan Enterprise Park as having potential for a ground mounted solar development, subject to detailed planning considerations. While the site is Grade 3a BMV land, it performs best in this respect when compared to the other solar related candidate site submissions. Allocation of the site provides an opportunity to contribute to local and national renewable energy targets.
LPA Recommendation	It is therefore proposed to allocate part of the site for B1,B2,B8 employment use as set out in Policy EA1, with the site specific reference EA1i Raglan Enterprise Park, Raglan. Part of the site is also allocated as having potential for a ground mounted solar development in Policy CC2 – Renewable Energy Allocation.

Candidate Site: CS0183 South of Monmouth Road, Raglan	Representor:
1. Glamorgan Gwent Archaeological Trust Ltd assess the site as AMBER – Subsequent to an archaeological desk-based assessment, geophysical survey, and archaeological field evaluation, for a previous submission in the planning process, due to evidence of Medieval activity within the area, it was, and remains, our opinion, that development could be mitigated by condition, in accordance with an agreed Written Scheme of Historic Environment Mitigation. 2. Raglan Community council believe the development of this site would lead to an unacceptable loss of agricultural land and would damage the high-quality historical landscape important to conservation areas, the castle, and residents for recreation. 3. Concerns re unsustainable transport and commuting impacts, safety re the increase in traffic movement, and congestion in the village centre, which is not aided by the approved application for 45 residential dwellings. 4. Concerns re the number of housing units allocated to Raglan. Responder believes the site's scale to be out of proportion with the existing village. If it is not economical to develop a site below 120 units, then the responder believes the previously approved 45 dwellings should be annulled. 5. Responder believes CS0205 to be a natural expansion of the village down to its natural boundary of the Wilcae River, and a better fit. 6. Responder and site promotor, Richborough Estates, are in full support of the site for residential allocation. The responders state that there are no fundamental constraints with the site, but note that the council require an FCA to support any application, which they believe due to previous attempts of development on the site will be overcome, as flooding risks can be mitigated with scheme design/ planning condition, and that the development of the site would result in a downstream benefit through a reduction in peak flow run-off, improving future resilience. 7. Richborough Estates maintain that the development will not only bring forward new residential development and a significant amount of public open space, but also the potential to accommodate community uses, to be determined at a later date based on local needs. An area of 0.2 ha is set aside as part of the scheme for community use.	1. Glamorgan Gwent Archaeological Trust Ltd 2. Raglan Community Council 3. Raglan Community Council plus 1 Private Individual 4. 1 Private Individual 5. 1 Private Individual 6. Richborough Estates 7. Richborough Estates

LPA Response	Comments noted. A reduced area to the candidate site submission is proposed for allocation in the RLDP. Overall, the site performs well against the site search sequence with good access to local amenities and no fundamental constraints have been identified. The site also meets key policy requirements, including 50% affordable housing and net zero carbon homes, demonstrating its viability and deliverability.
LPA Recommendation	It is proposed to allocate the site for approximately 54 dwellings with site specific policy requirements set out in Policy HA10 Land South of Monmouth Road, Raglan.

Candidate Site: CS0205 Land at Usk Road, Raglan	Representor:
1. Glamorgan Gwent Archaeological Trust Ltd assess the site as RED – Previous response to consultation recommended desk-based assessment and geophysical survey prior to any determination of an application would inform mitigation, which may include further pre-determination work; our understanding of the site has not changed since then, and recommendation remains the same. 2. Responder supports the allocation of the site as the developable area of the site is modest and more in scale with Raglan's needs. As the site is not extendable, it will round the village off to the natural boundary of the brook. The site is also accessible and safe for commuting. 3. Concerns re volume of residential development being allocated to Raglan and believes the existing 45 units allocated should be annulled. 4. Responder believes the site would be a natural extension of the village down to its boundary of the river, having good access without impacting congestion. 5. Site promoter and responder Edenstone, support the allocation of the site. See additional supporting documents for the Monmouthshire RLDP Preferred Strategy Representations on behalf of Edenstone.	1. Glamorgan Gwent Archaeological Trust Ltd 2. Raglan Community Council 3. 1 Private Individual 4. 1 Private Individual 5. Edenstone
LDP Response	Comments noted. While a southern section of the site is within a flood risk area, development could be directed away from this part of the site. However, the site is not allocated as there is sufficient and more suitable land available for residential development within Raglan to accommodate its housing need.
LDP Recommendation	This site will not be allocated in the Deposit RLDP.

Candidate Site: CS0278 Land West of Raglan	Representor:
1. Glamorgan Gwent Archaeological Trust Ltd assess the site as RED – The HER notes the site of a potential Medieval land management adjacent; artefacts of prehistoric date recorded within the site. An archaeological desk-based assessment and geophysical survey prior to any determination of an application would inform mitigation, which may include further pre-determination work. 2. Concerns re the scale of the site in relation to the rest of the community and its needs. 3. The development of a site of this scale would heavily reduce the amount of high-quality agricultural land. 4. Concerns re unsustainable transport and commuting caused by proposed development contrary to Planning Policy Wales. Site will generate an unacceptable level of traffic. 5. Concerns re the impact that the proposed development will have on the setting and landscape of the village from viewpoints across the area. 6. Responder objects to this site as they believe that the needs of the present are met but at the cost of compromising the ability for future generations to meet their own needs. 7. Responder believes existing commercial estate should be expanded instead of allocating a new site.	1. Glamorgan Gwent Archaeological Trust Ltd 2. Raglan Community Council 3. Raglan Community Council plus 1 Private Individual 4. Raglan Community Council 5. Raglan Community Council 6. 1 Private Individual 7. 1 Private Individual 8. 1 Private Individual

	8. Responder believes this site to be the best out of those proposed due to its good road access and believes that the development would bring lots of advantages. 9. Concerns regarding the incomplete residential site for 45 dwellings within the village envelope and will object of site CS0278 until the council demonstrates its ability to turn planning into reality. 10. Responders believe the site is deliverable, viable and developable and meets the requirements of the preferred strategy. 11. The site has good access and could be developed without significantly effecting the existing village. The site also provides a range of employment opportunities; therefore, the responders support the development of the site and ask that the council contact them if they require further information pertaining to the site.	9. 1 Private Individual 10. 1 Private Individual 11. 1 Private Individual
LPA Response	Comments noted. A reduced area of approximately 4.5 ha (compared to the submitted 8ha) is proposed to be allocated for employment use in the RLDP, responding to site elevations and integrating the proposal more effectively into the landscape. No fundamental development constraints have been identified as part of the assessment process. Its allocation will provide much needed employment land in Raglan and the wider County reflecting Raglan's location and its access links to other settlements.	
LPA Recommendation	It is therefore proposed to allocate the site for B1,B2,B8 employment use as set out in Policy EA1, with the site specific reference EA1j Land West of Raglan.	
Candidate Site: CS0281 Raglan Country Estate		Representor:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as RED – The HER notes the area as a part of a Medieval deer park, some changes due to the landscaping for the golf club, areas of land remain as fields; artefacts of prehistoric date recorded within the site. An archaeological desk-based assessment and geophysical survey prior to any determination of an application would inform mitigation, which may include further pre-determination work. 2. Concerns re scale of the development and effect this would have on the landscape from vantage points around the community. 3. Concerns that developments would cause an increase in traffic generation. 4. The responder objects to the development of the site as they believe it focuses on short terms needs and doesn't consider the long-term implications it could have on future residents. 5. Responder would object to this site if CS0278 was approved as they believe it is a better site from an access point of view and would also object if there was no strategic traffic planning in place for the development.	1. Glamorgan Gwent Archaeological Trust Ltd 2. Raglan Community Council 3. Raglan Community Council plus 1 Private Individual 4. Raglan Community Council 5. 1 Private Individual
LPA Response	Comments noted. While internal and external consultee comments were obtained on tourism sites, the proposed tourism policy approach in the Deposit Plan more appropriately allows for consideration of sustainable tourism related proposals, including beyond identified settlement boundaries. It is therefore not considered appropriate/necessary to identify site specific tourism related allocations in the RLDP.	
LPA Recommendation	This site will not be allocated in the Deposit RLDP.	

Usk

Candidate Site: CS0039 Little Castle Farm, Monmouth Road, Usk	Representor:
1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red. Farm buildings extant on 1831 First Series mapping, desk-based assessment and geophysical survey prior to any determination of an application would inform mitigation, which may include further pre-determination work. 2. Responders state that along with the other two sites (CS0113 and CS0282) would amount to an unacceptable scale of expansion of Usk and would be contrary to MCC policy of just a small amount of new housing in secondary settlements. 3. Concerns re a surface water problem and the phosphate issues which continue to pollute the river. The River Usk is a SSSI/SAC and is heavily polluted with the highest phosphate levels of any river in Wales. 4. Concerns that development will increase the risk of flooding due to the lack of natural moisture absorption through fields, hedgerows and trees. 5. Concerns that Usk's sewerage system is antiquated and unable to cope with current demand. Sewage matter is released through the Mill St Combined Storm Overflow. 6. The A472 passing through Usk is one of only 2 areas in Monmouthshire that is subject to Air Quality Monitoring. This is exacerbated by inadequate parking leading to on street parking which causes congestion. Any development would likely lead to further commuting and general travel with worsening air quality. 7. Concerns for Usk bridge which cannot withstand more big lorries which would be needed for construction along with the increase in traffic that development would bring. 8. Responders state there is no road access to this field and any new access onto Monmouth Road would require up-grading of that stretch of road. 9. Concerns that the town does not have the infrastructure of doctors/dentists/local transport/school/leisure facilities to handle any further demand. 10. Responders state there is a limited bus service, sporadic evening taxi service and no railway station resulting in a high dependence on car use and no investment to develop cycleways to relieve local traffic. 11. Responders state that the site falls outside the desirable 20 minute walk from the centre of Usk town and, with it's significant gradient, would not be a sustainable site nor promote active travel. 12. Concerns re the limited amount of employment within Usk with no realistic expectation developing sufficient jobs to employ new residents. 13. Responders feel there is a lack of study in the area of Environment/Animals/Landscape with reference to the impact any development would have on protected animal and bird species. Usk has an iconic landscape with importance for wildlife sustainability, existing habitat and habitat connectivity for protected species such as bats and newts.	1. Glamorgan Gwent Archaeological Trust Ltd 2. Usk Civic Society plus 3 Private Individuals 3. Usk Town Council plus 13 Private Individuals 4. Usk Town Council plus 17 Private Individuals 5. Usk Town Council plus 13 Private Individuals 6. Usk Town Council plus 12 Private Individuals 7. 2 Private Individuals 8. 2 Private Individuals 9. Usk Town Council plus 12 Private Individuals 10. Usk Town Council, Usk Civic Society plus 7 Private Individuals 11. Usk Civic Society plus 6 Private Individuals 12. 8 Private Individuals 13. Usk Town Council plus 10 Private Individuals 14. Usk Town Council, Usk Civic Society plus 10 Private Individuals 15. 2 Private Individuals 16. 1 Private Individual 17. 1 Private Individual 18. 1 Private Individual 19. 1 Private Individual

	14. Responders state that any development above the current contour of the Usk settlement would have a detrimental effect on the existing landscape. Expansive views from the nearby popular tourist footpath would be ruined. 15. Responders state that the land proposed is greenfield, grade 3 agricultural land currently used for crops and grazing. 16. Concerns re the loss of open green space, within walking distance, for health and wellbeing. 17. Concerns that development would affect the privacy of existing homes. 18. A responder states that Usk is a historic town and the site is the location of the battle of Pwll Melyn and as such should be preserved. 19. Notices at the candidate sites would have ensured a more representative consultation.	
LPA Response	Comments noted. Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements. Landscape and ecological concerns have also been raised particularly in relation to a significant proportion of the site being a designated Site of Importance for Nature Conservation (SINC) and due to the topography of the site and its elevated position it is likely to have a detrimental landscape impact. Overall, there are considered to be more suitable alternative sites in the area.	
LPA Recommendation	This site will not be allocated in the Deposit RLDP.	
Candidate Site: CS0105 Land at Former Goods Yard, Usk		Representor:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Amber. 19th century goods yard to the Monmouth to Pontypool railway, extant contemporary buildings, also Second World War defences in the immediate area. Development could be mitigated by condition, in accordance with an agreed Written Scheme of Historic Environment Mitigation. 2. A responder states that Flood modelling by JBA Consulting concludes that the site is at flood risk in extreme events. It is proposed that the development site is raised above the flood level to comply with TAN15. Compensatory flood storage should be implemented alongside the ground raising. The responder states that their clients control land outside of the site which could provide storage for the development of the site but could also contribute towards the wider flood defences for Usk. 3. Usk Civic Society objects to the site due to it being in the 1 in 100 year flood event zone making it unsuitable for vulnerable housing development. Furthermore the A472 (the means of exit from the site) floods in sub 1 in 100 events (eg Storm Dennis). Other responders have concerns re the increased potential of water run-off which is already a problem on Monmouth Road. 4. Support for development of the site as it is brownfield and its size is in proportion to the targets identified in the RLDP Preferred Strategy. The site is close to town centre enabling residents to walk and not increase traffic and development would have a positive impact on the visual appeal of the area. 5. Respondents state that Usk and nearby settlements have very limited employment opportunities requiring residents to travel for work and as public transport is limited, to an infrequent bus service, these journeys have to be made by car. 6. Concerns re increased pollution, as air quality levels in the town are currently below the required standards and an increase in traffic will exacerbate this, along with extra congestion, parking problems and a greater risk of accidents at current black spots. 7. Concerns re local amenities. There is no spare capacity in services such as GPs and dentists, and, no local bank or police station.	1. Glamorgan Gwent Archaeological Trust Ltd 2. 2 Private Individuals 3. Usk Civic Society plus 4 Private Individuals 4. 1 Private Individual 5. 3 Private Individuals 6. 4 Private Individual 7. 4 Private Individuals 8. 5 Private Individuals 9. 3 Private Individuals 10. 1 Private Individual

	8. Concerns regarding the ageing sewage system, lack of investment by Dwr Cymru/Welsh Water and pollution of the river Usk from sewage outfall. Respondents have further concerns of pollution to the River Usk, from increased urban run off from development of the site and the risk of increased phosphorus loading. 9. Concerns that development will have a detrimental impact on the habitats of local wildlife; evidence of protected species at the candidate site. 10. A responder feels that notices at the candidate sites would have ensured a more representative consultation.	
LPA Response	Site not progressing as insufficient information has been submitted in relation to viability to demonstrate the site is deliverable in accordance with key policy requirements. The site, which is within the settlement boundary of Usk is previously developed land, a protected employment site in the current LDP that has been vacant for some time. The site is wholly within flood zones 2 and 3, however is within a TAN15 defended zone. National Policy set out in TAN15 does allow for brownfield sites in defended zones to be considered acceptable providing they can meet flood risk criteria set out in the policy. The costs of flood risk mitigation also has had an impact of the viability and deliverability of the site. There is also constraint in relation connection to public sewerage system, with the connection point at least 400m away from the site, again resulting in significant costs. A private sewerage treatment plant would not be appropriate for a development of this scale, particularly as the site is within a phosphate catchment zone of the River Usk Special Area of Conservation (SAC). Overall, it is not viable and deliverable to progress this site as an allocation. The site remains in the settlement boundary and as a consequence could progress for appropriate forms of development subject to detailed planning considerations.	
LPA Recommendation	This site will not be allocated in the Deposit RLDP.	

Candidate Site: CS0113 Burrium Gate (Phase II), Usk

		Representor:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red. Farm buildings extant on 1831 First Series mapping, desk-based assessment and geophysical survey prior to any determination of an application would inform mitigation, which may include further pre-determination work. 2. Responders state that along with the other two sites (CS0113 and CS0282) would amount to an unacceptable scale of expansion of Usk and would be contrary to MCC policy of just a small amount of new housing in secondary settlements. 3. Concerns re a surface water problem and the phosphate issues which continue to pollute the river. The River Usk is a SSSI/SAC and is heavily polluted with the highest phosphate levels of any river in Wales. 4. Concerns that development will increase the risk of flooding due to the lack of natural moisture absorption through fields, hedgerows and trees. 5. Concerns that Usk's sewerage system is antiquated and unable to cope with current demand. Sewage matter is released through the Mill St Combined Storm Overflow. 6. The A472 passing through Usk is one of only 2 areas in Monmouthshire that is subject to Air Quality Monitoring. This is exacerbated by inadequate parking leading to on street parking which causes congestion. Any development would likely lead to further commuting and general travel with worsening air quality.	1. Glamorgan Gwent Archaeological Trust Ltd 2. Usk Civic Society plus 3 Private Individuals 3. Usk Town Council plus 12 Private Individuals 4. Usk Town Council plus 19 Private Individuals 5. Usk Town Council plus 12 Private Individuals 6. Usk Town Council plus 14 Private Individuals 7. 1 Private Individual 8. 1 Private Individual

	7. Concerns regarding the hazard of double parking and parking on pavements at the existing dwellings in the vicinity of this site. 8. Concerns for Usk bridge which cannot withstand more big lorries which would be needed for construction along with the increase in traffic that development would bring. 9. Responders state there is no road access to this field and any new access onto Monmouth Road would require up-grading of that stretch of road. 10. Concerns that the town does not have the infrastructure of doctors/dentists/local transport/schools/leisure facilities to handle any further demand. A responder comments on the closure and cutting back of many services including the closure of the local police station and of the waste recycling facility. 11. Responders state there is a limited bus service, sporadic evening taxi service and no railway station resulting in a high dependence on car use and no investment to develop cycleways to relieve local traffic. 12. Responders state that the site falls outside the desirable 20 minute walk from the centre of Usk town and, with it's significant gradient, would not be a sustainable site nor promote active travel. 13. Concerns re the limited amount of employment within Usk with no realistic expectation of developing sufficient jobs to employ new residents; increasing the need for commuting. 14. Responders feel there is a lack of study in the area of Environment/Animals/Landscape with reference to the impact any development would have on protected animal and bird species. Usk has an iconic landscape with importance for wildlife sustainability, existing habitat and habitat connectivity for protected species such as bats and newts. 15. Responders state that any development above the current contour of the Usk settlement would have a detrimental effect on the existing landscape. Expansive views from the nearby popular tourist footpath would be ruined. 16. Responders state that the land proposed is greenfield, grade 3 agricultural land currently used for crops and grazing. 17. Concerns re the loss of open green space, within walking distance, for health and wellbeing. 18. Responders state that Usk is a historic town and the proposed site is the location of the battle of Pwll Melyn, and as such, should be preserved. Development would have a detrimental impact on the features and areas of tourism interest and on the beautiful and peaceful landscape. 19. Notices at the candidate sites would have ensured a more representative consultation.	9. 1 Private Individual 10. Usk Town Council plus 15 Private Individuals 11. Usk Town Council, Usk Civic Society plus 10 Private Individuals 12. Usk Civic Society plus 6 Private Individuals 13. 11 Private Individual 14. Usk Town Council plus 11 Private Individual 15. Usk Town Council, Usk Civic Society plus 10 Private Individuals 16. 3 Private Individuals 17. 1 Private Individual 18. 2 Private Individuals 19. 1 Private Individual
LPA Response	Comments noted. The site performs well against the assessment methodology with no fundamental constraints identified. A landscape concern has been raised but it is considered that this cand be mitigated providing development is maintained within a ridgeline no more than 40m above Ordnance Datum (AOD). The site also meets key policy requirements, including 50% affordable housing and net zero carbon homes, demonstrating its viability and deliverability.	
LPA Recommendation	It is proposed to allocate the site for approximately 40 dwellings with site specific policy requirements set out in Policy HA11 Land east of Burrium Gate, Usk.	
Candidate Site: CS0282 North Burrium Gate, Usk		Representor:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red. Farm buildings extant on 1831 First Series mapping, desk-based assessment and geophysical survey prior to any determination of an application would inform mitigation, which may include further pre-determination work. 2. The site sponsor, Johnsey Estates 2020 Ltd, supports the site and makes the following comments:	1. Glamorgan Gwent Archaeological Trust Ltd

Page 1690	• By virtue of its location relatively close to Monmouth and the key services and facilities available in Monmouth and in Usk itself, Usk has the potential to accommodate a level of growth. • Usk experiences higher levels of self-containment and provides significant potential for minimising the need to travel and for sustainable travel. • Initial site and other assessments have confirmed that there are no fundamental constraints to the site coming forward for development. • It is anticipated that the site could provide up to 95 units which would increase the critical mass of the settlement and help to sustain vital local services and facilities. 3. Responders state that along with the other two sites (CS0113 and CS0282) would amount to an unacceptable scale of expansion of Usk and would be contrary to MCC policy of just a small amount of new housing in secondary settlements. 4. Concerns re a surface water problem and the phosphate issues which continue to pollute the river. The River Usk is a SSSI/SAC and is heavily polluted with the highest phosphate levels of any river in Wales. 5. Concerns that development will increase the risk of flooding due to the lack of natural moisture absorption through fields, hedgerows and trees. 6. Concerns that Usk's sewerage system is antiquated and unable to cope with current demand. Sewage matter is released through the Mill St Combined Storm Overflow. 7. The A472 passing through Usk is one of only 2 areas in Monmouthshire that is subject to Air Quality Monitoring. This is exacerbated by inadequate parking leading to on street parking which causes congestion. Any development would likely lead to further commuting and general travel with worsening air quality. 8. Concerns for Usk bridge which cannot withstand more big lorries which would be needed for construction along with the increase in traffic that development would bring. 9. Responders state there is no road access to this field and any new access onto Monmouth Road would require up-grading of that stretch of road. 10. Concerns that the town does not have the infrastructure of doctors/dentists/local transport/school/leisure facilities to handle any further demand. There is no local recycling centre, supermarket nor police presence. 11. Responders state there is a limited bus service, sporadic evening taxi service and no railway station resulting in a high dependence on car use and no investment to develop cycleways to relieve local traffic. 12. Responders state that the site falls outside the desirable 20 minute walk from the centre of Usk town and, with it's significant gradient, would not be a sustainable site nor promote active travel. 13. Concerns re the limited amount of employment within Usk with no realistic expectation developing sufficient jobs to employ new residents. 14. Responders feel there is a lack of study in the area of Environment/Animals/Landscape with reference to the impact any development would have on protected animal and bird species. Usk has an iconic landscape with importance for wildlife sustainability, existing habitat and habitat connectivity for protected species such as bats and newts. 15. Responders state that any development above the current contour of the Usk settlement would have a detrimental effect on the existing landscape. Expansive views from the nearby popular tourist footpath would be ruined. 16. Responders state that the land proposed is greenfield, grade 3 agricultural land currently used for crops and grazing.	2. Johnsey Estates 2020 Ltd 3. Usk Civic Society plus 4 Private Individuals 4. Usk Town Council plus 13 Private Individuals 5. Usk Town Council plus 17 Private Individuals 6. Usk Town Council plus 14 Private Individuals 7. Usk Town Council plus 14 Private Individuals 8. 3 Private Individuals 9. 1 Private Individual 10. Usk Town Council plus 13 Private Individuals 11. Usk Town Council, Usk Civic Society plus 9 Private Individuals 12. Usk Civic Society plus 4 Private Individuals 13. 10 Private Individuals 14. Usk Town Council plus 10 Private Individuals 15. Usk Town Council, Usk Civic Society plus 9 Private Individuals 16. 5 Private Individuals 17. 1 Private Individual 18. 2 Private Individuals 19. 1 Private Individual

	17. Concerns re the loss of open green space, within walking distance, for health and wellbeing. 18. Responders state that Usk is a historic town and the proposed site is the location of the battle of Pwll Melyn, and as such, should be preserved. Development would have a detrimental impact on the features and areas of tourism interest and on the beautiful and peaceful landscape. 19. Notices at the candidate sites would have ensured a more representative consultation.	
LPA Response	Comments noted. Site not progressing to the Deposit Plan as there are landscape and ecological concerns, particularly in relation to a significant proportion of the site being a designated Site of Importance for Nature Conservation (SINC), and due to the topography of the site and its elevated position. Overall, there are considered to be more suitable alternative sites in the area.	
LPA Recommendation	This site will not be allocated in the Deposit RLDP.	
Candidate Site: CS0285 Glen Yr Afon, Usk		Representor:
	1. A responder raises the following concerns: • Massive population increase with limited employment opportunities in Usk. • Increased pollution, congestion and parking problems. • Services including GP and dentist already under strain and no local bank or police station. • Ageing sewage system already overwhelmed. • Increased risk of flooding due to loss of land absorbency. • Further encroachment on the habitat of delicate ecosystems.	1. 1 Private Individual
LPA Response	Comments noted. Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements.	
LPA Recommendation	This site will not be allocated in the Deposit RLDP.	

Main Rural Settlements

Devauden

Candidate Site: CS0036 North Devauden

		Representor:
Page 1692	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Green. No recorded or known archaeological or historic environment issues. 2. The site promotor, Leathdunn Ltd, has submitted supporting information for the site and makes the following points: • The site is not constrained by topography, ecology, heritage or landscape features and its proximity and connection to Devauden make it a logical extension of the settlement. • A Flood Consequence Assessment would need to be carried out for the site to confirm its suitability for development and confirm that an FCA would be carried out and submitted with any planning application for the site should it be allocated within the RLDP. • The site would not contribute to coalescence of Devauden with any other settlement and would not represent encroachment into the countryside due to the presence of existing properties to the north. 3. Responders state that the site was previously rejected as a candidate site due to its High Biodiversity Value and has subsequently been designated as a SINC. 4. The site has species-rich hedgerows and is considered to have high connectivity value to both the adjacent habitat and the wider landscape of the neighbouring SINC sites. 5. Concerns that the site is highly visible within the Wye Valley AONB; development of a site with evidenced high biodiversity value and within an AONB would directly contravene The Well-being of Future Generations (Wales) Act 2015. 6. Concerns that the sewage treatment plant in Devauden is at capacity; there have been sewage overflow issues already. 7. Concerns regarding surface water run off on the property directly below the site.	1. Glamorgan Gwent Archaeological Trust Ltd 2. Leathdunn Ltd 3. 3 Private Individuals 4. 2 Private Individual 5. 3 Private Individuals 6. 2 Private Individual 7. 1 Private Individual
LPA Response	Comments noted. Site is not allocated as there is sufficient and more suitable land available for residential development within the primary settlement of Monmouth to accommodate its housing need.	
LPA Recommendation	This site will not be allocated in the Deposit RLDP.	

Candidate Site: CS0214 Land at Churchfields, Devauden

		Representor:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Green. No recorded or known archaeological or historic environment issues. 2. The site promotor, Monmouthshire Housing Association, makes the following supporting comments:	1. Glamorgan Gwent Archaeological Trust Ltd

	• The development opportunity is considered to represent proportionate growth in line with the Council's {referred Strategy. • The site will provide much needed affordable homes. • The development will help support and benefit from existing services within the settlement. • Devauden is served by a bus route between the key towns of Monmouth and Chepstow. • Landscape Appraisal confirmed that there's no reason why the site could not be developed in landscape and visual terms with regard to the AONB.	2. Monmouthshire Housing Association
LPA Response	The site performs well against the assessment methodology with no fundamental constraints identified. The site also meets key policy requirements, including 50% affordable housing and net zero carbon homes, demonstrating its viability and deliverability.	
LPA Recommendation	It is proposed to allocate the site for approximately 20 dwellings with site specific policy requirements set out in Policy HA14 Land at Churchfields, Devauden.	

Little Mill

Candidate Site: CS0016 Land to the east of Little Mill		Representor:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Green - No recorded or known archaeological or historic environment issues. 2. On the basis of the technical, work set out at the Candidate Sites stage in August 2021, the site sponsor believes this site is technically deliverable, viable and developable and meets the requirements of the Preferred Strategy. The site has sound access off the public and highway and good transport links. The responder believes the site is a logical extension to the wider village and could be developed without significantly affecting the setting of the existing village. The proposal for the site includes a small commercial hub to support local businesses and startups. 3. A responder states that this rural employment site is on greenfield land and would not be in sufficiently close proximity to Usk to serve as a local employment opportunity for this Tier 2 Secondary Settlement. 4. SEWRIGS group state that the site lies within the Usk Terminal Moraine Regionally Important Geodiversity Site (RIGS): Important site showing the maximum extent of the Late Devensian glaciation in SE Wales. The study of the last ice age is part of Climate Science. This site was the limit of glaciation during the last ice age. It is important that no action is taken which would jeopardise further research. As stated in Planning Policy Wales, Planning Authorities should protect the features and qualities for which RIGS have been designated. The impact of proposed developments will depend on the nature of the RIGS feature, so early consultation with the local RIGS group or NRW is strongly recommended.	1. Glamorgan Gwent Archaeological Trust Ltd 2. BB3 Limited 3. 1 Private Individual 4. SEWRIGS group

LPA Response	Comments noted. A reduced area to the candidate site submission is proposed for allocation in the RLDP. Overall, the site performs well against the site search sequence. The site also meets key policy requirements, including 50% affordable housing and net zero carbon homes, demonstrating its viability and deliverability. The commercial element of the candidate site submission for B1/B8 uses is not considered appropriate in this location and given the site's reduced size. More appropriate sites for B1/B8 uses are identified elsewhere in the County.
LPA Recommendation	It is proposed to allocate the site for approximately 20 dwellings with site specific policy requirements set out in Policy HA15 Land east of Little Mill.

Candidate Site: CS0075 Little Mill (Site B)	Representor:
1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Green - No recorded or known archaeological or historic environment issues.	1. Glamorgan Gwent Archaeological Trust Ltd

LPA Response	Comment noted. This is an existing Adopted LDP allocation (SAH11(v)) and is reallocated in the RLDP as a 'Rollover' Allocation. A resolution to approve planning application DM/2020/01438 for 15 residential units was made by Planning Committee on 16th July 2024 and is awaiting the signing of the S106 Agreement.
LPA Recommendation	It is proposed to allocate the site for approximately 15 dwellings with site specific policy requirements set out in Policy HA16 Land North of Little Mill.

Candidate Site: CS0103 Adj Berthon Road, Little Mill	Representor:
1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Green - No recorded or known archaeological or historic environment issues. Mill race shown on historic mapping forms the southern boundary. 2. Monmouthshire Housing Association have submitted separate supporting information but note that an FCA has been prepared which concludes that the site is in Flood Zone A which is considered to be at little or no risk of flooding and that proposed development would not increase flooding elsewhere. 3. Concerns re volume of traffic exacerbating a dangerous junction from a private driveway, a potentially dangerous junction into the site and over height HGVs unable to pass under the railway bridge. 4. Concerns re flooding as the lower area of the site is often waterlogged and during periods of heavy rain is flooded. The site currently acts as a sponge so should it be built on there are concerns as to the effect on water levels further down into the village. 5. Environmental issues including concern for the three large oaks on site which provide habitat for a number of bird species, the meadow itself is a hunting ground for owls and the hedgerows provide habitat for hedgehogs and slow worms. 6. A responder states that the village has a lack of amenities, no school and a limited bus service. Pavements under the narrow railway bridge are inadequate and there is no safe crossing for the dual carriageway.	1. Glamorgan Gwent Archaeological Trust Ltd 2. Monmouthshire Housing Association 3. 1 Private Individual 4. 1 Private Individual 5. 1 Private Individual 6. 1 Private Individual

LPA Response	Comments noted. The site is not allocated as there is sufficient and more suitable land available for residential development within Little Mill to accommodate its housing need.
LPA Recommendation	This site will not be allocated in the Deposit RLDP.

Candidate Site: CS0104 Cae Melin, Little Mill	Representor:
1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Green - No recorded or known archaeological or historic environment issues. Trackway shown on historic mapping to the east. 2. The site sponsor, Persimmon Homes East Wales, makes the following key points: • The site is within a short walk of local amenities and services including a but stop which provides access to the 61 & 63 services. • Further services, amenities and employment at nearby towns and cities are easily accessible via the A4042. • The site is not located within the Upper River Wye Catchment Area and is not impacted by the implications of the TAN15 flood map. • There are no designations that cannot be carefully mitigated and accommodated for. 3. SEWRIGS group state that the site falls within the Usk Glacier Terminal Morain RIGS. As per PPW, Planning Authorities should protect the features and qualities for which RIGS have been designated. The impact of proposed developments will depend on the nature of the RIGS feature so early consultation with the local RIGS group or NRW is strongly recommended. 4. Concerns re flooding to adjacent property caused by run off from this site; development of the site would exacerbate this. 5. A responder states that the site is currently used for agricultural purposes: graving for livestock as well as providing hay/silage. 6. Concerns re increased pressure on sewerage system 7. Concerns re overloading of local infrastructure such as doctors surgery and the school at Penperlleni. 8. Concerns re increased traffic on the roads and reduced air quality.	1. Glamorgan Gwent Archaeological Trust Ltd 2. Persimmon Homes East Wales 3. SEWRIGS group 4. 1 Private Individual 5. 1 Private Individual 6. 1 Private Individual 7. 1 Private Individual 8. 1 Private Individual

LPA Response	Comments noted. The site is not allocated as there is sufficient and more suitable land available for residential development within Little Mill to accommodate its housing need.
LPA Recommendation	This site will not be allocated in the Deposit RLDP.

Candidate Site: CS0233 Mulberry House, Berthon Road, Little Mill	Representor:
1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Green - No recorded or known archaeological or historic environment issues.	1. Glamorgan Gwent Archaeological Trust Ltd 2. SEWRIGS group

	2. SEWRIGS group state that the site falls within the Usk Glacier Terminal Morain RIGS. As per PPW, Planning Authorities should protect the features and qualities for which RIGS have been designated. The impact of proposed developments will depend on the nature of the RIGS feature so early consultation with the local RIGS group or NRW is strongly recommended.	
LPA Response	Comments noted. The small-scale nature of the site does not justify an allocation in the plan. Further consideration will be given to the site as part of the settlement boundary review.	
LPA Recommendation	This site will not be allocated in the Deposit RLDP.	
Candidate Site: CS0241 Land to North of Little Mill (Site A)		Representor:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Green - No recorded or known archaeological or historic environment issues.	1. Glamorgan Gwent Archaeological Trust Ltd
LPA Response	Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements.	
LPA Recommendation	This site will not be allocated in the Deposit RLDP.	

Llanbadoc

Candidate Site: CS0238 Land at Prioress Mill Lane, Llanbadoc		Representor:
	1. A responder makes the following points in support of the site: • Monmouthshire has a net-outflow of commuters; support for inward investment and local employment growth/opportunities is needed. • This site would facilitate the provision of a range of types and sizes of employment uses in a broadly sustainable location where it could serve nearby communities, including the settlement of Usk, and complement nearby uses, on previously developed commercial land. It is therefore firmly contended that the site is in accordance with the Preferred Strategy. • No other Candidate Sites were promoted in or around the settlement of Usk for employment use. Only two Candidate Sites, which included employment use in rural areas, have been progressed; both of these rural employment sites are on greenfield land and neither would be in sufficiently close proximity to Usk to serve as a local employment opportunity for this Tier 2 Secondary Settlement which has been identified for growth.	1. 1 Private Individual
LPA Response	Comments noted. Site is not considered compatible with the Preferred Strategy due to its location in the open countryside. As such, the site is not suitable for development and has not progressed further in the candidate site assessment process.	

LPA Recommendation	This site will not be allocated in the Deposit RLDP.

Llandogo

Candidate Site: CS0101 Land adjacent to Parklands, Llandogo

		Representor:
Page 1697	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red – Concerns about the impact of the site on the Lower Wye Valley Registered Landscape of Outstanding Historical interest, and HLCA024 Llandogo and the need for an ASIDOHL. No recorded or known archaeological features in the site. 2. The responder is concerned that the current village infrastructure is not able to sustain the new development. 3. Concerns re an increase in commuters, and that access and commuting roads used will not be suitable for an influx in usage. Roads have been subject to landslips and falling trees, deep surface water after heavy rain and surface degradation, making them not fit for current usage. 4. Concerns re previous major water outages and the measures the wastewater treatment works will take to cope with the new developments. 5. Bus service does not operate in times needed for an increase in usage by working people. 6. Concerns re the use of greenfield sites for new housing and how the infrastructure needed for new developments will degrade the wildlife and biodiversity of the village, negatively impacting Wye Valley as an AONB. 7. Concerns re flooding and what defences will need to be implemented as the site is subject to TAN 15 and water covers the lower parts of the fields when the Wye breaches. 8. Concern re vacant properties around the site many of which are used for Holiday Letting and Airbnb, reducing the amount of long-term rental properties.	1. Glamorgan Gwent Archaeologic Trust Ltd 2. 1 Private Individual 3. 1 Private Individual 4. 1 Private Individual 5. 1 Private Individual 6. 1 Private Individual 7. 1 Private Individual 8. 1 Private Individual

LPA Response	Comments noted. Site is located within the existing development boundary which is proposed to be retained in this location. Given the site's location within the settlement boundary proposals can be pursued via the planning application system, subject to detailed planning policies.
LPA Recommendation	This site will not be allocated in the Deposit RLDP.

Candidate Site: CS0124 The Reckless, Llandogo

		Representor:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red – Concerns about the impact of the site on the Lower Wye Valley Registered Landscape of Outstanding Historical interest, and HLCA024 Llandogo and the need for an ASIDOHL. No recorded or known archaeological features in the site. 2. The responder is concerned that the current village infrastructure is not able to sustain the new development.	1. Glamorgan Gwent Archaeologic Trust Ltd 2. 1 Private Individual 3. 1 Private Individual 4. 1 Private Individual 5. 1 Private Individual 6. 1 Private Individual

	3. Concerns re an increase in commuters, and that access and commuting roads used will not be suitable for an influx in usage. Roads have been subject to landslips and falling trees, deep surface water after heavy rain and surface degradation, making them not fit for current usage. 4. Concerns re previous major water outages and the measures the wastewater treatment works will take to cope with the new developments. 5. Bus service does not operate in times needed for an increase in usage by working people. 6. Concerns re the use of greenfield sites for new housing and how the infrastructure needed for new developments will degrade the wildlife and biodiversity of the village, negatively impacting Wye Valley as an AONB. 7. Concerns re flooding and what defences will need to be implemented as the site is subject to TAN 15 and water covers the lower parts of the fields when the Wye breaches. 8. Concern re vacant properties around the site many of which are used for Holiday Letting and Airbnb, reducing the amount of long-term rental properties.	7. 1 Private Individual 8. 1 Private Individual
LPA Response	Comments noted. Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements. Therefore, this site will not be allocated in the RLDP.	
LPA Recommendation	This site will not be allocated in the Deposit RLDP.	

Candidate Site: CS0230 Land South of A466, Llandogo		Representor:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red – Concerns about the impact of the site on the Lower Wye Valley Registered Landscape of Outstanding Historical interest, and HLCA017 Wye Valley Railway South and the need for an ASIDOHL. No recorded or known archaeological features in the site. Wye Valley Railway forms the southern boundary. 2. The responder is concerned that the current village infrastructure is not able to sustain the new development. 3. Concerns re an increase in commuters, and that access and commuting roads used will not be suitable for an influx in usage. Roads have been subject to landslips and falling trees, deep surface water after heavy rain and surface degradation, making them not fit for current usage. 4. Concerns re previous major water outages and the measures the wastewater treatment works will take to cope with the new developments. 5. Bus service does not operate in times needed for an increase in usage by working people. 6. Concerns re the use of greenfield sites for new housing and how the infrastructure needed for new developments will degrade the wildlife and biodiversity of the village, negatively impacting Wye Valley as an AONB. 7. Concerns re flooding and what defences will need to be implemented as the site is subject to TAN 15 and water covers the lower parts of the fields when the Wye breaches. 8. Concern re vacant properties around the site many of which are used for Holiday Letting and Airbnb, reducing the amount of long-term rental properties.	1. Glamorgan Gwent Archaeologic Trust Ltd 2. 1 Private Individual 3. 1 Private Individual 4. 1 Private Individual 5. 1 Private Individual 6. 1 Private Individual 7. 1 Private Individual 8. 1 Private Individual

LPA Response	Comments noted. Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements.
LPA Recommendation	This site will not be allocated in the Deposit RLDP.

Candidate Site: CS0245 Land at Parklands, Llandogo	Representor:
1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red – Concerns about the impact of the site on the Lower Wye Valley Registered Landscape of Outstanding Historical interest, and HLCA024 Llandogo and the need for an ASIDOHL. No recorded or known archaeological features in the site. 2. The responder is concerned that the current village infrastructure is not able to sustain the new development. 3. Concerns re an increase in commuters, and that access and commuting roads used will not be suitable for an influx in usage. Roads have been subject to landslips and falling trees, deep surface water after heavy rain and surface degradation, making them not fit for current usage. 4. Concerns re previous major water outages and the measures the wastewater treatment works will take to cope with the new developments. 5. Bus service does not operate in times needed for an increase in usage by working people. 6. Concerns re the use of greenfield sites for new housing and how the infrastructure needed for new developments will degrade the wildlife and biodiversity of the village, negatively impacting Wye Valley as an AONB. 7. Concerns re flooding and what defences will need to be implemented as the site is subject to TAN 15 and water covers the lower parts of the fields when the Wye breaches. 8. Concern re vacant properties around the site many of which are used for Holiday Letting and Airbnb, reducing the amount of long-term rental properties.	1. Glamorgan Gwent Archaeologic Trust Ltd 2. 1 Private Individual 3. 1 Private Individual 4. 1 Private Individual 5. 1 Private Individual 6. 1 Private Individual 7. 1 Private Individual 8. 1 Private Individual

LPA Response	Comments noted. Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements.
LPA Recommendation	This site will not be allocated in the Deposit RLDP.

Llanellen

Candidate Site: CS0027 Adj Llanellen Court (North)

		Representor:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red – The HER notes the findspot of a 1st century Roman brooch; not noted if an isolated find or related to other evidence of activity. Desk based assessment and geophysical survey prior to any determination of an application would inform mitigation, which may include further pre-determination work.	1. Glamorgan Gwent Archaeological Trust Ltd
LPA Response	Comment noted. A reduced area of 1.56ha to the candidate site submission is proposed for allocation in the RLDP to provide a more appropriate scale of development in a village context and to reflect the settlement's position in the hierarchy. Overall, the site performs well against the site search sequence and no fundamental constraints have been identified. The site also meets key policy requirements including 50% affordable housing and net zero carbon homes demonstrating its viability and deliverability.	
LPA Recommendation	It is proposed to allocate the site for 26 dwellings with site specific policy requirements set out in Policy HA17 Land adjacent to Llanellen Court Farm, Llanellen.	

Candidate Site: CS0215 Land at Llanellen

		Representor:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red – The HER notes the findspot of a 1st century Roman brooch; not noted if an isolated find or related to other evidence of activity. Desk based assessment and geophysical survey prior to any determination of an application would inform mitigation, which may include further pre-determination work. 2. The site promotor has submitted Preferred Strategy representation forms and supporting information and makes the following points: • The site is located in Flood Zone A and is considered to be at very low risk of fluvial/tidal flooding. • The site is well located within reasonable walking distance of local bus services and village hall.	1. Glamorgan Gwent Archaeological Trust Ltd 2. Monmouthshire Housing Association
LPA Response	Comments noted. Site not progressing as significant concerns have been raised in relation ecological impact.	
LPA Recommendation	This site will not be allocated in the Deposit RLDP.	

Candidate Site: CS0243 North of Village Hall, Llangybi

		Representor:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Green. No recorded or known archaeological or historic environment issues.	1. Glamorgan Gwent Archaeological Trust Ltd

	2. The site promotor, Llanover Estates, has submitted extensive information in support of the site and makes the following points: • Initial site and other assessments have shown that there are no fundamental constraints to the site coming forward for development. • The site itself is not subject to any statutory designations and is located close to employment opportunities, schools, healthcare and the range of facilities and services offered by Abergavenny Town Centre. • The site has the capacity to accommodate a wetland area which will not only act to separate the built development from the River Usk, but will also offer the opportunity to incorporate reed beds for the purpose of phosphate stripping. 3. A responder feels that the B4269 which links the site to the A4042 suffers from substandard junction arrangement with the A4042 in terms of geometry and visibility. 4. The responder states that the site has a high Landmap value for LLCA in terms of visual and sensory, historic and cultural landscapes. 5. The site lies within Flood zone 2/3 and is at risk of flooding by the River Usk. 6. The sites northern boundary is in direct proximity to the River Usk corridor which forms part of an ecological designation within the current LDP (SSSi & SAC) which indicates that the site has high ecological significance.	2. Llanover Estates 3. 1 Private Individual 4. 1 Private Individual 5. 1 Private Individual 6. 1 Private Individual
LPA Response	Comments noted. Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements.	
LPA Recommendation	This site will not be allocated in the Deposit RLDP.	

Llangwm

Candidate Site: CS0283 Rockfield Farm, Llangwm		Representor:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red – The HER notes the Scheduled Monument of Ringwork NE of New House MM074 borders the site. Desk based assessment and geophysical survey prior to any determination of an application would inform mitigation, which may include further pre-determination work.	1. Glamorgan Gwent Archaeological Trust Ltd
LPA Response	Comment noted. Site is not considered compatible with the Preferred Strategy due to its location in the open countryside. As such, the site is not suitable for development and has not progressed further in the candidate site assessment process.	
LPA Recommendation	This site will not be allocated in the Deposit RLDP.	

Llangybi

Candidate Site: CS0019 St Cybi Drive, Llangybi		Representor:
Page 1702	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Green - No recorded or known archaeological or historic environment issues. 2. Concerns re the 50yr old sewage system, and its ability to cope with current sewage levels at the Treatment Plant. Frequent blockages and overflows have caused effluent to flow out onto Ynys Lane, which has had an impact on pedestrians most notably dog walkers. An increased number of residents, is believed, will exacerbate the issues, and disturb existing systems. 3. Concerns re waterlogging and natural springs which feed down into the lower reaches of the village. Surface water is already streaming through properties nearby the sites due to insufficient infrastructure. The reduction of permeable land due to development will create a serious risk of flood. 4. Concerns re an increased number of vehicles and therefore traffic due to new developments, where existing infrastructure inadequately deals with current demands because of narrow roads and lack of pavements. Parking for vehicles has become a problem, especially near existing MHA dwellings. 5. Concerns re the lack and loss of local amenities such as the school, shop, post office services, sports facilities, and garage. This has contributed to scepticism surrounding the areas categorisation as a main village in the RLDP proposals. 6. Concerns re developments preventing the continued use of the site as agricultural land for sheep to graze upon and its importance in the lambing process. 7. Concerns regarding the existing limited bus service. 8. Concerns re distance of the site from main road systems.	1. Glamorgan Gwent Archaeological Trust 2. Llangybi Fawr Community Council plus 4 Private Individuals 3. 4 Private Individuals 4. 5 Private Individuals 5. Llangybi Fawr Community Council plus 3 Private Individuals 6. Llangybi Fawr Community Council 4 Private Individuals 7. Llangybi Fawr Community Council plus 4 Private Individuals 8. 2 Private Individuals
LPA Response	Comments noted. Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements.	
LPA Recommendation	This site will not be allocated in the Deposit RLDP.	

Candidate Site: CS0020 West The Chase, Llangybi		Representor:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Green - No recorded or known archaeological or historic environment issues.	1. Glamorgan Gwent Archaeological Trust 2. Llangybi Fawr Community Council

	2. Concerns re the 50yr old sewage system, and its ability to cope with current sewage levels at the Treatment Plant. Frequent blockages and overflows have caused effluent to flow out onto Ynys Lane, which has had an impact on pedestrians most notably dog walkers. An increased number of residents, is believed, will exacerbate the issues, and disturb existing systems. 3. Concerns re waterlogging and natural springs which feed down into the lower reaches of the village. Surface water is already streaming through properties nearby the sites due to insufficient infrastructure. The reduction of permeable land due to development will create a serious risk of flood. 4. Concerns re an increased number of vehicles and therefore traffic due to new developments, where existing infrastructure inadequately deals with current demands because of narrow roads and lack of pavements. Parking for vehicles has become a problem, especially near existing MHA dwellings. 5. Concerns re the lack and loss of local amenities such as the school, shop, post office services, sports facilities, and garage. This has contributed to scepticism surrounding the areas categorisation as a main village in the RLDP proposals. 6. Concerns re developments preventing the continued use of the site as agricultural land for sheep to graze upon and its importance in the lambing process. 7. Concerns regarding the existing limited bus service.	plus 4 Private Individuals 3. Llangybi Fawr Community Council plus 2 Private Individuals 4. Llangybi Fawr Community Council plus 2 Private Individuals 5. Llangybi Fawr Community Council plus 2 Private Individuals 6. Llangybi Fawr Community Council plus 2 Private Individuals 7. Llangybi Fawr Community Council plus 2 Private Individuals
LPA Response	Comments noted. Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements. Landscape concerns have also been identified.	
LPA Recommendation	This site will not be allocated in the Deposit RLDP.	
Candidate Site: CS0242 Land North of New House, Llangybi		Representor:
	1. Glamorgan Gwent Archaeological Trust assess the site as Red – Included orchards shown on Tithe, borders managed features of withy beds and ponds, associated with New House Farm just outside boundary to the south. HER details extensive prehistoric artefacts and cropmarks, and enclosure of potential Iron Age/ Roman date in the field and surrounding fields. Desk based assessment and geophysical survey prior to any determination of an application would inform mitigation, which may include further pre-determination work. 2. Concerns re the 50yr old sewage system, and its ability to cope with current sewage levels at the Treatment Plant. Frequent blockages and overflows have caused effluent to flow out onto Ynys Lane, which has had an impact on pedestrians most notably dog walkers. An increased number of residents, is believed, will exacerbate the issues, and disturb existing systems.	1. Glamorgan Gwent Archaeological Trust 2. Llangybi Fawr Community Council plus 1 Private Individual 3. Llangybi Fawr Community Council 4. Llangybi Fawr Community Council

	3. Concerns re waterlogging and natural springs which feed down into the lower reaches of the village. Surface water is already streaming through properties nearby the sites due to insufficient infrastructure. The reduction of permeable land due to development will create a serious risk of flood. 4. Concerns re an increased number of vehicles and therefore traffic due to new developments, where existing infrastructure inadequately deals with current demands because of narrow roads and lack of pavements. Parking for vehicles has become a problem, especially near existing MHA dwellings. 5. Concerns re the lack and loss of local amenities such as the school, shop, post office services, sports facilities, and garage. This has contributed to scepticism surrounding the areas categorisation as a main village in the RLDP proposals. 6. Concerns re developments preventing the continued use of the site as agricultural land for sheep to graze upon and its importance in the lambing process. 7. Concerns regarding the existing limited bus service.	plus 1 Private Individual 5. Llangybi Fawr Community Council 6. Llangybi Fawr Community Council 7. Llangybi Fawr Community Council
LPA Response	Comments noted. Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements. Landscape concerns have also been identified and Cadw raised concerns in relation to the impact of any development upon the nearby listed building and registered historic park and garden.	
LPA Recommendation	This site will not be allocated in the Deposit RLDP.	

Llanishen

Candidate Site: CS0221 Land at Penarth Farm, Llanishen

		Representor:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Green – No recorded or known archaeological or historic environment issues.	1. Glamorgan Gwent Archaeological Trust Ltd
LPA Response	Comment noted. Llanishen is located within Tier 4 Minor Rural Settlement. Only minor infilling considered acceptable, subject to the detailed planning policy requirements.	
LPA Recommendation	This site will not be allocated in the Deposit RLDP.	

Candidate Site: CS0222 Land at Penarth Farm, Llanishen

		Representor:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red – HER notes potential mill site. Desk-based assessment and geophysical survey prior to any determination of an application would inform mitigation, which may include further pre-determined work.	1. Glamorgan Gwent Archaeological Trust Ltd
LPA Response	Comment noted. The site is not being progressed as an allocation due to its location in the Wye Valley National Landscape (AONB) and PPW's policy position that the AONB designation should be afforded the highest protection. In addition, 67% of the site relates to Best and Most Versatile agricultural land, with	

	the Minster for Climate Change letter of 1st March 2022 noting that significant weight should be given to protecting BMV land where solar arrays are proposed and the availability of more suitable alternatives.
LPA Recommendation	This site will not be allocated in the Deposit RLDP.

Llanover

Candidate Site: CS0139 Land at Former Petrol Station, Llanover	Representor:
1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red – Eastern boundary adjacent to the road bordering the Registered Park and Garden of Llanover Park PGW(Gt)41(MON) Cadw must be consulted and a Heritage Impact Assessment undertaken to ascertain the impact of the proposal on the setting of the Park. 2. The site promotor, Llanover Estates, has submitted extensive information in support of the site and makes the following points: • Initial site and other assessments have shown that there are no fundamental constraints to the site coming forward for development. • The site forms a logical extension to the existing Llanover Business Centre which contributes a strong existing employment function to the settlement, providing employment opportunities both for the settlement and more widely to the nearby rural villages. • Llanover has relatively good connection to nearby settlements by a range of public transport and active travel opportunities and is therefore an appropriate location for employment growth. 3. A responder states that this rural employment site is on greenfield land and would not be in sufficiently close proximity to Usk to serve as a local employment opportunity for it as a Tier 2 Secondary Settlement, which has been identified for growth.	1. Glamorgan Gwent Archaeological Trust Ltd 2. Llanover Estates 3. 1 Private Individual
LPA Response	Comments noted. The site is not progressing as an allocation due to heritage concerns regarding the impact on the Llanover Conservation Area, nearby Listed Buildings and the Llanover Historic Park and Garden.
LPA Recommendation	This site will not be allocated in the Deposit RLDP.

Candidate Site: CS0140 South of Rhyd-y-Meirch, Llanover		Representor:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Green. No recorded or known archaeological or historic environment issues. 2. The site promotor, Llanover Estates, has submitted extensive information in support of the site and makes the following points: • Llanover has the potential to accommodate a level of growth as recognised through its inclusion in the Preferred Strategy as a Main Rural Settlement. • Initial site and other assessments have shown that there are no fundamental constraints to the site coming forward for development. • The site itself is not subject to any statutory designations and is located close to employment opportunities, schools, healthcare and the range of facilities and services offered by Abergavenny Town Centre.	1. Glamorgan Gwent Archaeological Trust Ltd 2. Llanover Estates
LPA Response	Comments noted. Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements.	
LPA Recommendation	This site will not be allocated in the Deposit RLDP.	

Mathern

Candidate Site: CS0026 West Baileys Hay, Mathern		Representor:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red – No recorded or known archaeological or historic environment issues. Mill race noted on historic mapping, outside the boundary to the west. 2. Concerns re lack of infrastructure and amenities and plans for new infrastructure and amenities to support current residents, such as broadband services, playparks, and education centres. An increase in residents due to the developments will only worsen the issue. 3. Concerns re inadequate Public Transport facilities and active travel measures to provide access to local areas and for commuting purposes, only increasing car usage. 4. New residents are likely to work away from home increasing number of commuters. Roads are inadequate for current levels of traffic and congestion and development would exacerbate this. Current congestion on the A48 increases the number of cars using small local lanes which are not able to deal with the demand. Increased car usage leads to increased pollution. Concerns re safety of those accessing area via active travel. 5. Concerns re impact on aesthetics. Development needs to be sensitive of the village's local character. 6. Concerns re health services ability to cope demand and an increased number of residents due to development will increase issues.	1. Glamorgan Gwent Archaeological Trust Ltd 2. Mathern Community Council, Cllr Louise Brown plus 3 Private Individuals 3. Mathern Community Council, Cllr Louise Brown plus 1 Private Individual 4. Mathern Community Council, Cllr Louise Brown plus 4 Private Individuals

	7. Concerns re sewerage and water drainage facilities as effluent has previously spilled out onto the street and the use of WCs in local dwellings have been affected. Water pressure and electricity supply may also be affected by the developments. 8. Site is agriculturally productive. 9. Concerns re development of the area as it is not marked as a national growth area identified in Future Wales 2040. 10. Concerns re sites partial inclusion in Main Village Boundary and therefore should not be taken forward into the replacement LDP. 11. Concerns re the introduction of a younger demographic and its effects on pace of life. New residents negatively impact areas by using development as strategic residence for commuting and not contributing to existing village culture. 12. New developments are not affordable. Concerns over the viability of 50% affordable housing and concerns over low standards for net zero homes. 13. Lack of or no consultation with residents affected by the site. Residents not included in the correct area zones for consultation	5. Mathern Community Council, Cllr Louise Brown 6. Mathern Community Council, Cllr Louise Brown plus 2 Private Individuals 7. 2 Private Individuals 8. 1 Private Individual 9. 2 Private Individuals 10. Cllr Louise Brown 11. 2 Private Individuals 12. 1 Private Individual 13. 1 Private Individual
LPA Response	Comments noted. Site is not progressing as although the site meets key policy requirements including 50% affordable housing and net zero carbon homes, the proposed scale and size of the site is too large for a Main Rural Settlement. There are also concerns in relation to negative landscape impact associated with the proposed scale of the site within a wide open landscape, along with its close proximity to Mathern's Conservation Area. The site search sequence has identified that there are more suitable sites available for residential development within our Main Rural Settlements to accommodate identified housing need.	
LPA Recommendation	This site will not be allocated in the Deposit RLDP.	
Candidate Site: CS0053 East of Cherry Trees, Mathern		Representor:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red – Adjoins the Registered Park of WyelandsPGW(Gt)51(MON), and part of the Essential Setting is within the south-eastern part of the site. Assessment of the impact will need to be undertaken to Cadw Guidance. 2. Drainage issues including concerns re the open water source flowing through the site which has made the site prone to flooding, development could enhance this. 3. Concerns re access to the site and the impact of increased use by cars on non-vehicle users. 4. Concerns over lack of infrastructure for existing residents, such as NHS availability and public transport. 5. An increased number of residents in the area will result in more traffic and subsequent congestion. 6. Concerns re unmanaged conservation area. 7. Responder expresses overall support.	1. Glamorgan Gwent Archaeologic Trust Ltd 2. Mathern Community Council, Cllr Louise Brown plus 1 Private Individual 3. Cllr Louise Brown plus 1 Private Individual 4. Mathern Community Council 5. 1 Private Individual 6. 1 Private Individual 7. Mathern Community Council

LPA Response	Comments noted. Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements.
LPA Recommendation	This site will not be allocated in the Deposit RLDP.

Portskewett

Candidate Site: CS0066 Bridge View Farm, Portskewett	Representor:
1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red. A desk based assessment and geophysical survey prior to any determination of an application would inform mitigation which may include further pre-determination work. 2. Concern that local services are unable to copy with expansion. Primary schools and secondary schools are at full capacity as are the doctors and dentists. 3. Traffic congestion is a concern as any incidents on the M4 or either of the bridges causes chaos in both directions. 4. A responder states that a lack of local employment and public transport options means greater pollution due to reliance on the car. 5. A responder feels that a lack of green open space and countryside is having an effect on nature, flooding and the general health of those who live here.	1. Glamorgan Gwent Archaeological Trust Ltd 2. 1 Private Individual 3. 1 Private Individual 4. 1 Private Individual 5. 1 Private Individual

LPA Response	Comments noted. The site is not being progressed as an allocation due to concerns raised in relation to the site's location on the Gwent Levels. In addition, the site is wholly Grade 2 BMV land, with the Minster for Climate Change letter of 1st March 2022 noting that significant weight should be given to protecting BMV land where solar arrays are proposed and the availability of more suitable alternatives.
LPA Recommendation	This site will not be allocated in the Deposit RLDP.

Candidate Site: CS0259 Bridge View Farm, Portskewett	Representor:
1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red. A desk based assessment and geophysical survey prior to any determination of an application would inform mitigation which may include further pre-determination work. 2. Concern that local services are unable to copy with expansion. Primary schools and secondary schools are at full capacity as are the doctors and dentists. 3. Traffic congestion is a concern as any incidents on the M4 or either of the bridges causes chaos in both directions. 4. A responder states that a lack of local employment and public transport options means greater pollution due to reliance on the car.	1. Glamorgan Gwent Archaeological Trust Ltd 2. 1 Private Individual 3. 1 Private Individual 4. 1 Private Individual 5. 1 Private Individual

	5. A responder feels that a lack of green open space and countryside is having an effect on nature, flooding and the general health of those who live here.	
LPA Response	Comments noted. While internal and external consultee comments were obtained on tourism sites, the proposed tourism policy approach in the Deposit Plan more appropriately allows for consideration of sustainable tourism related proposals, including beyond identified settlement boundaries. It is therefore not considered appropriate/necessary to identify site specific tourism related allocations in the RLDP.	
LPA Recommendation	This site will not be allocated in the Deposit RLDP.	

Pwllmeryic

Candidate Site: CS0030 Land Off Chapel Lane, Pwllmeyric		Representor:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red – A crop mark is noted in the area, no further information. Desk-based assessment and geophysical survey prior to any determination of an application would inform mitigation, which may include further pre-determination work. 2. Concerns re development of the area as it is not marked as a national growth area identified in Future Wales 2040. 3. Site is an essential and clearly visible piece of green between Pwllmeyric and Mathern. 4. Site is productively in use as valuable agricultural land. 5. Roads surrounding the area are already congested and a new development would increase traffic and therefore noise and pollution. Potential to obstruct emergency vehicle accessibility. Access in and out of area will also be affected. 6. Concerns re infrastructure such as broadband, education, local amenities, NHS: Doctors and Dentist already under strain from current residents, adding to this will have a detrimental impact. 7. Compromise local character, identity, and individuality of the area as two villages will be joined if the site is no longer green belt. 8. Concerns re drainage and the previous flooding of the area as well as new developments being able to cope with sewerage demands. 9. Concerns re the introduction of a younger demographic and its effects on pace of life. New residents negatively impact areas by using developments as strategic dormitories for commuting to larger cities and towns. 10. New developments are not affordable. Concerns over the viability of 50% affordable housing and concerns over low standards for net zero homes. 11. Lack of or no consultation with residents affected by the site. Residents not included in the correct area zones for consultation.	1. Glamorgan Gwent Archaeological Trust Ltd 2. 2 Private Individuals 3. Mathern Community Council, Cllr Louise Brown plus 1 Private Individual 4. Mathern Community Council plus 1 Private Individual 5. Mathern Community Council, Cllr Louise Brown plus 4 Private Individuals 6. Mathern Community Council, Cllr Louise Brown 4 Private Individuals 7. Mathern Community Council, Cllr Louise Brown plus 1 Private Individual

		8. Cllr Louise Brown plus 2 Private Individuals 9. 2 Private Individuals 10. 1 Private Individual 11. 1 Private Individual
LPA Response	Comments noted. Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements.	
LPA Recommendation	This site will not be allocated in the Deposit RLDP.	

Shirenewton

Candidate Site: CS0111 Adjacent to Thistledown Barn, Shirenewton		Representor:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red – HER details extensive prehistoric artefacts and cropmarks, and enclosure of potential Iron Age / Roman date in the field and surrounding fields. Desk-based assessment and geophysical survey prior to any determination of an application would inform mitigation, which may include pre-determination work. 2. In favour of as it is justifiable in relation to flood risk and proposed drainage strategy in line with Statutory SuDS Standards. 3. Concern re previous flooding in relation to drainage and sewerage management, with fields being flooded with raw sewerage from existing residents, and the implications caused by a new development on the site. 4. Concerns re lack of current infrastructure in the village such as public transport, broadband, shop, pub, post office, which will be even more insufficient after this site is developed. 5. The school has reached its maximum capacity and NHS service are being overwhelmed by current demands, which will only be exacerbated by a large increase in residents. 6. Concerns re the scale and over-bearing plans of new developments in proportion to the existing village and therefore its character and appearance, and a reduction in the open aspect of the village and its existing views, significantly expanding the size of the village. 7. Concerns re an increase in traffic on the rural roads, as the only option for new residents would be to access facilities in neighbouring villages and towns using private vehicles. Adding more traffic because of an increase in residents will exacerbate congestion and pollution, there are no public charging points for electric vehicles and current infrastructure to support these schemes are not complete and plans are yet to be produced. Also concerns re the lack of safe pedestrian footpaths in the village and to walk to Chepstow and no dedicated cycle route as the country lanes can be dangerous for everyone. Responders note that the development will decrease access to the area and that there is already an issue with speeding. Because of the remote nature of the site and its lack of links to centres and amenities only further increases the necessity to use cars for transport.	1. Glamorgan Gwent Archaeological Trust 2. 1 Private Individual 3. Shirenewton Community Council plus 7 Private Individuals 4. Shirenewton Community Council plus 9 Private Individuals 5. Shirenewton Community Council plus 5 Private Individuals 6. Shirenewton Community Council plus 8 Private Individuals 7. Shirenewton Community Council plus 9 Private Individuals

	8. Responders note that the development of the site would mean the loss of valuable green wedge land, important to the villages distinct sense of place and identity. The green space maintains the distinction between the countryside and the settlements and protects the open character and landscape of the area. It is also noted that the green space greatly benefits humans and wildlife and is an important component of the wildlife reserve. Concerned re development of grade one agriculture land being in contrast to the views of Future Wales 2040 which, prioritises the development of Newport, Cardiff, and the Valleys. 9. Concern re site being outside of defined village development boundary and would extend the village envelope. 10. Responder believes sites in rural areas should be allocated for self-build bungalows for a retiring population, freeing up existing family homes in the area. Responder also believes that a rural village is not the place to build affordable homes for young people and notes that they will be better served by a town with more facilities, access to transport and a wider availability of services. 11. Concerns re the villages lack of opportunities for sustainable growth in terms of employment as there are no SMEs to provide jobs. 12. Responders fail to see how development in the village will help the climate emergency, noting that it's the opposite of what Future Wales 2040 wants. 13. Concerns of significant adverse effects on current residential amenity, by reason of noise disturbance, overlooking, loss of privacy, overshadowing etc. 14. Responder notes that local consultation should take place on the options before any individual sites are considered for inclusion in the allocation. 15. Concerns that the proposed candidate site is capable under MCC's housing density policy of up to 26 units, which, is far more than the settlement average. 16. Responder believes the proposal to be alienating the people who have moved to the countryside for all of its benefits, driving them somewhere else and reducing the desirability of the village. This is detrimental to Monmouthshire and will take away the key reasons as to why residents want to live in Shirenewton.	8. Shirenewton Community Council plus 7 Private Individuals 9. Shirenewton Community Council plus 4 Private Individuals 10. 1 Private Individual 11. Shirenewton Community Council plus 2 Private Individuals 12. 2 Private Individuals 13. 1 Private Individual 14. 1 Private Individual 15. Shirenewton Community Council 16. 1 Private Individual
LPA Response	Comments noted. Site not progressing as it is wholly Grade 2 Best and Most Versatile agricultural land and there are more suitable alternative sites with a lesser proportion of BMV land in Shirenewton.	
LPA Recommendation	This site will not be allocated in the Deposit RLDP.	
Candidate Site: CS0208 West Shirenewton Recreation Hall, Shirenewton		Representor:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red – HER details extensive prehistoric artefacts in the field and surrounding fields. Desk-based assessment and geophysical survey prior to any determination of an application would inform mitigation, which may include further pre-determination work. 2. Concern re previous flooding in relation to drainage and sewerage management, with fields being flooded with raw sewerage from existing residents, and the implications caused by a new development on the site. 3. Concerns re lack of current infrastructure in the village such as public transport, broadband, shop, pub, post office, which will be even more insufficient after this site is developed.	1. Glamorgan Gwent Archaeological Trust Ltd 2. Shirenewton Community Council plus 4 Private Individuals

	4. The school has reached its maximum capacity and NHS service are being overwhelmed by current demands, which will only be exacerbated by a large increase in residents. 5. Concerns re the scale and over-bearing plans of new developments in proportion to the existing village and therefore its character and appearance, and a reduction in the open aspect of the village and its existing views, significantly expanding the size of the village. 6. Concerns re an increase in traffic on the rural roads, as the only option for new residents would be to access facilities in neighbouring villages and towns using private vehicles. Adding more traffic because of an increase in residents will exacerbate congestion and pollution, there are no public charging points for electric vehicles and current infrastructure to support these schemes are not complete and plans are yet to be produced. Also concerns re the lack of safe pedestrian footpaths in the village and to walk to Chepstow and no dedicated cycle route as the country lanes can be dangerous for everyone. Responders note that the development will decrease access to the area and that there is already an issue with speeding. Because of the remote nature of the site and its lack of links to centres and amenities only further increases the necessity to use cars for transport. 7. Responders note that the development of the site would mean the loss of valuable green wedge land, important to the villages distinct sense of place and identity. The green space maintains the distinction between the countryside and the settlements and protects the open character and landscape of the area. It is also noted that the green space greatly benefits humans and wildlife and is an important component of the wildlife reserve. Concerned re development of grade one agriculture land being in contrast to the views of Future Wales 2040 which, prioritises the development of Newport, Cardiff, and the Valleys. 8. Concern re site being outside of defined village development boundary and would extend the village envelope. 9. Concerns re the villages lack of opportunities for sustainable growth in terms of employment as there are no SMEs to provide jobs. 10. Responders fail to see how development in the village will help the climate emergency. 11. Concerns of significant adverse effects on current residential amenity, by reason of noise disturbance, overlooking, loss of privacy, overshadowing etc. 12. Responder notes that local consultation should take place on the options before any individual sites are considered for inclusion in the allocation. 13. Concerns that the proposed candidate site is capable under MCC's housing density policy of up to 26 units, which, is far more than the settlement average. 14. Responder believes the proposal to be alienating the people who have moved to the countryside for all of its benefits, driving them somewhere else and reducing the desirability of the village. This is detrimental to Monmouthshire and will take away the key reasons as to why residents want to live in Shirenewton.	3. Shirenewton Community Council plus 6 Private Individuals 4. Shirenewton Community Council plus 3 Private Individuals 5. Shirenewton Community Council plus 7 Private Individuals 6. Shirenewton Community Council plus 6 Private Individuals 7. Shirenewton Community Council plus 5 Private Individuals 8. Shirenewton Community Council plus 4 Private Individuals 9. Shirenewton Community Council plus 1 Private Individual 10. 1 Private Individual 11. 1 Private Individual 12. 1 Private Individual 13. Shirenewton Community Council 14. 1 Private Individual
LPA Response	Comments noted. Site not progressing as significant concerns have been raised in relation to heritage impact.	
LPA Recommendation	This site will not be allocated in the Deposit RLDP.	

Candidate Site: CS0218 Land at Ditch Hill Lane, Shirenewton (Option A)		Representor:
Page 1713	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as RED – Coxe's Well marked at the eastern periphery, other springs marked on historic mapping; the Well marked as a Brake on the Tithe Map. HER details extensive prehistoric artefacts and cropmarks, and enclosure of potential Iron Age / Roman date in the field and surrounding fields. Desk-based assessment and geophysical survey prior to any determination of an application would inform mitigation, which may include further pre-determination work. 2. Concern re previous flooding in relation to drainage and sewerage management, with fields being flooded with raw sewerage from existing residents, and the implications caused by a new development on the site. 3. Concerns re lack of current infrastructure in the village such as public transport, broadband, shop, pub, post office, which will be even more insufficient after this site is developed. 4. The school has reached its maximum capacity and NHS service are being overwhelmed by current demands, which will only be exacerbated by a large increase in residents. 5. Concerns re the scale and over-bearing plans of new developments in proportion to the existing village and therefore its character and appearance, and a reduction in the open aspect of the village and its existing views, significantly expanding the size of the village. 6. Concerns re an increase in traffic on the rural roads, as the only option for new residents would be to access facilities in neighbouring villages and towns using private vehicles. Adding more traffic because of an increase in residents will exacerbate congestion and pollution, there are no public charging points for electric vehicles and current infrastructure to support these schemes are not complete and plans are yet to be produced. Also concerns re the lack of safe pedestrian footpaths in the village and to walk to Chepstow and no dedicated cycle route as the country lanes can be dangerous for everyone. Responders note that the development will decrease access to the area and that there is already an issue with speeding. Because of the remote nature of the site and its lack of links to centres and amenities only further increases the necessity to use cars for transport. 7. Responders note that the development of the site would mean the loss of valuable green wedge land, important to the villages distinct sense of place and identity. The green space maintains the distinction between the countryside and the settlements and protects the open character and landscape of the area. It is also noted that the green space greatly benefits humans and wildlife and is an important component of the wildlife reserve. Concerned re development of grade one agriculture land being in contrast to the views of Future Wales 2040 which, prioritises the development of Newport, Cardiff, and the Valleys. 8. Concern re site being outside of defined village development boundary and would extend the village envelope. 9. Concerns re the villages lack of opportunities for sustainable growth in terms of employment as there are no SMEs to provide jobs. 10. Responders fail to see how development in the village will help the climate emergency. 11. Concerns of significant adverse effects on current residential amenity, by reason of noise disturbance, overlooking, loss of privacy, overshadowing etc. 12. Responder notes that local consultation should take place on the options before any individual sites are considered for inclusion in the allocation.	1. Glamorgan Gwent Archaeological Trust Ltd 2. Shirenewton Community Council plus 6 Private Individuals 3. Shirenewton Community Council plus 7 Private Individuals 4. Shirenewton Community Council plus 3 Private Individuals 5. Shirenewton Community Council plus 8 Private Individuals 6. Shirenewton Community Council plus 7 Private Individuals 7. Shirenewton Community Council plus 6 Private Individuals 8. Shirenewton Community Council plus 3 Private Individuals 9. Shirenewton Community Council plus 1 Private Individual 10. 1 Private Individual 11. 3 Private Individuals 12. 1 Private Individual

	13. Concerns that the proposed candidate site is capable under MCC's housing density policy of up to 26 units, which, is far more than the settlement average. 14. Responder believes the proposal to be alienating the people who have moved to the countryside for all of its benefits, driving them somewhere else and reducing the desirability of the village. This is detrimental to Monmouthshire and will take away the key reasons as to why residents want to live in Shirenewton. 15. Responder concerned that any alteration to the current drainage would adversely affect their property, causing erosion and undermining their boundary wall.	13. Shirenewton Community Council 14. 1 Private Individual 15. 1 Private Individual
LPA Response	Comments noted. Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements.	
LPA Recommendation	This site will not be allocated in the Deposit RLDP.	
Candidate Site: CS0225 Land at Ditch Hill Lane, Shirenewton (Option B)		Representor:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as RED – Coxe's Well marked at the eastern periphery, other springs marked on historic mapping; the Well marked as a Brake on the Tithe Map. HER details extensive prehistoric artefacts and cropmarks, and enclosure of potential Iron Age / Roman date in the field and surrounding fields. Desk-based assessment and geophysical survey prior to any determination of an application would inform mitigation, which may include further pre-determination work. 2. Concern re previous flooding in relation to drainage and sewerage management, with fields being flooded with raw sewerage from existing residents, and the implications caused by a new development on the site. 3. Concerns re lack of current infrastructure in the village such as public transport, broadband, shop, pub, post office, which will be even more insufficient after this site is developed. 4. The school has reached its maximum capacity and NHS service are being overwhelmed by current demands, which will only be exacerbated by a large increase in residents. 5. Concerns re the scale and over-bearing plans of new developments in proportion to the existing village and therefore its character and appearance, and a reduction in the open aspect of the village and its existing views, significantly expanding the size of the village. 6. Concerns re an increase in traffic on the rural roads, as the only option for new residents would be to access facilities in neighbouring villages and towns using private vehicles. Adding more traffic because of an increase in residents will exacerbate congestion and pollution, there are no public charging points for electric vehicles and current infrastructure to support these schemes are not complete and plans are yet to be produced. Also concerns re the lack of safe pedestrian footpaths in the village and to walk to Chepstow and no dedicated cycle route as the country lanes can be dangerous for everyone. Responders note that the development will decrease access to the area and that there is already an issue with speeding. Because of the remote nature of the site and its lack of links to centres and amenities only further increases the necessity to use cars for transport.	1. Glamorgan Gwent Archaeological Trust Ltd 2. Shirenewton Community Council plus 6 Private Individuals 3. Shirenewton Community Council plus 7 Private Individuals 4. Shirenewton Community Council plus 3 Private Individuals 5. Shirenewton Community Council plus 8 Private Individuals 6. Shirenewton Community Council plus 7 Private Individuals 7. Shirenewton Community Council

	7. Responders note that the development of the site would mean the loss of valuable green wedge land, important to the villages distinct sense of place and identity. The green space maintains the distinction between the countryside and the settlements and protects the open character and landscape of the area. It is also noted that the green space greatly benefits humans and wildlife and is an important component of the wildlife reserve. Concerned re development of grade one agriculture land being in contrast to the views of Future Wales 2040 which, prioritises the development of Newport, Cardiff, and the Valleys. 8. Concern re site being outside of defined village development boundary and would extend the village envelope. 9. Concerns re the villages lack of opportunities for sustainable growth in terms of employment as there are no SMEs to provide jobs. 10. Responders fail to see how development in the village will help the climate emergency. 11. Concerns of significant adverse effects on current residential amenity, by reason of noise disturbance, overlooking, loss of privacy, overshadowing etc. 12. Responder notes that local consultation should take place on the options before any individual sites are considered for inclusion in the allocation. 13. Concerns that the proposed candidate site is capable under MCC's housing density policy of up to 26 units, which, is far more than the settlement average. 14. Responder believes the proposal to be alienating the people who have moved to the countryside for all of its benefits, driving them somewhere else and reducing the desirability of the village. This is detrimental to Monmouthshire and will take away the key reasons as to why residents want to live in Shirenewton. 15. Responder concerned that any alteration to the current drainage would adversely affect their property, causing erosion and undermining their boundary wall.	plus 6 Private Individuals 8. Shirenewton Community Council plus 3 Private Individuals 9. Shirenewton Community Council plus 1 Private Individual 10. 1 Private Individual 11. 3 Private Individuals 12. 1 Private Individual 13. Shirenewton Community Council 14. 1 Private Individual 15. 1 Private Individual
LPA Response	Comments noted. Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements.	
LPA Recommendation	This site will not be allocated in the Deposit RLDP.	
Candidate Site: CS0226 Land at Ditch Hill Lane, Shirenewton (Option C)		Representor:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as RED – Coxe's Well marked at the eastern periphery, other springs marked on historical mapping; the Well is marked as a Brake on the Tithe Map. HER details extensive prehistoric artefacts and cropmarks, and enclosure of potential Iron Age / Roman date in the field and surrounding fields. Desk-based assessment and geophysical survey prior to any determination of an application would inform mitigation, which may include further pre-determination work. 2. Concern re previous flooding in relation to drainage and sewerage management, with fields being flooded with raw sewerage from existing residents, and the implications caused by a new development on the site. 3. Concerns re lack of current infrastructure in the village such as public transport, broadband, shop, pub, post office, which will be even more insufficient after this site is developed.	1. Glamorgan Gwent Archaeological Trust Ltd 2. Shirenewton Community Council plus 6 Private Individuals 3. Shirenewton Community Council plus 7 Private Individuals

	4. The school has reached its maximum capacity and NHS service are being overwhelmed by current demands, which will only be exacerbated by a large increase in residents. 5. Concerns re the scale and over-bearing plans of new developments in proportion to the existing village and therefore its character and appearance, and a reduction in the open aspect of the village and its existing views, significantly expanding the size of the village. 6. Concerns re an increase in traffic on the rural roads, as the only option for new residents would be to access facilities in neighbouring villages and towns using private vehicles. Adding more traffic because of an increase in residents will exacerbate congestion and pollution, there are no public charging points for electric vehicles and current infrastructure to support these schemes are not complete and plans are yet to be produced. Also concerns re the lack of safe pedestrian footpaths in the village and to walk to Chepstow and no dedicated cycle route as the country lanes can be dangerous for everyone. Responders note that the development will decrease access to the area and that there is already an issue with speeding. Because of the remote nature of the site and its lack of links to centres and amenities only further increases the necessity to use cars for transport. 7. Responders note that the development of the site would mean the loss of valuable green wedge land, important to the villages distinct sense of place and identity. The green space maintains the distinction between the countryside and the settlements and protects the open character and landscape of the area. It is also noted that the green space greatly benefits humans and wildlife and is an important component of the wildlife reserve. Concerned re development of grade one agriculture land being in contrast to the views of Future Wales 2040 which, prioritises the development of Newport, Cardiff, and the Valleys. 8. Concern re site being outside of defined village development boundary and would extend the village envelope. 9. Concerns re the villages lack of opportunities for sustainable growth in terms of employment as there are no SMEs to provide jobs. 10. Responders fail to see how development in the village will help the climate emergency. 11. Concerns of significant adverse effects on current residential amenity, by reason of noise disturbance, overlooking, loss of privacy, overshadowing etc. 12. Responder notes that local consultation should take place on the options before any individual sites are considered for inclusion in the allocation. 13. Concerns that the proposed candidate site is capable under MCC's housing density policy of up to 26 units, which, is far more than the settlement average. 14. Responder believes the proposal to be alienating the people who have moved to the countryside for all of its benefits, driving them somewhere else and reducing the desirability of the village. This is detrimental to Monmouthshire and will take away the key reasons as to why residents want to live in Shirenewton. 15. Responder concerned that any alteration to the current drainage would adversely affect their property, causing erosion and undermining their boundary wall.	4. Shirenewton Community Council plus 3 Private Individuals 5. Shirenewton Community Council plus 9 Private Individuals 6. Shirenewton Community Council plus 8 Private Individuals 7. Shirenewton Community Council plus 7 Private Individuals 8. Shirenewton Community Council plus 3 Private Individuals 9. Shirenewton Community Council plus 1 Private Individual 10. 1 Private Individual 11. 3 Private Individuals 12. 1 Private Individual 13. Shirenewton Community Council 14. 1 Private Individual 15. 1 Private Individual
LPA Response	Comments noted. Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements.	
LPA Recommendation	This site will not be allocated in the Deposit RLDP.	

Candidate Site: CS0229 Land Opposite Chepstow Garden Centre, Pwllmeyric (Shirenewton ward)		Representor:
Page 1717	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as RED – A complex of circular enclosures as crop marks tentatively identified as part of a prehistoric burial cairns are within the area. Desk-based assessment and geophysical survey prior to any determination of an application would inform mitigation, which may include further pre-determination work. 2. Concerns re drainage of the site as the field regularly floods from the local stream and is potentially in a flood zone area. The issue re flooding and drainage on the site would make the site unsuitable for the residential nature of a hotel and would render the solar panels ineffective if water-logged. Responders also note that the development of the site is likely to increase flooding elsewhere in the village and nearby buildings due to increased surface water runoff from the field. Concerns re current sewage infrastructure's inability to cope with current demands, resulting in raw sewage running down nearby roads, without any additional burden. 3. Responders concerned re road infrastructure's ability to deal with current demands and that development will only increase the number of cars using the local roads and also cars parked in the local lanes and in field and property access points. Development will not only increase traffic, congestion, and delays, but further degrade air quality due to increased pollution and increase noise. Responders note that motorist try to avoid traffic by using smaller local lanes that are not designed to accommodate the volume of traffic, also causing dangerous driving. Concerns re safety around the roads as the area is an existing accident hotspot having poor visibility. Responders note that the congestion also stops emergency vehicles being able to pass the main arterial route. No provisions have been made for safe walking and cycling routes, causing concerns for the safety of pedestrians. The introduction of 20mph speed limits is ineffective as reducing speeding. It is noted that there may be a conflict between the traffic coming out of both the garden centre and proposed hotel. 4. Responders note that the site is in an area that suffers from having no spare infrastructure and amenities locally to serve it, such as broadband, reliable public transport and playparks with existing infrastructure and amenities under further strain. Responders concerned that there are zero real plans for infrastructure and amenity improvement. 5. Concerns re NHS services at max capacity with long wait times and no availability, and a lack of schools locally to keep up with demand, both issues that will only get worse with increased development. 6. Scale Character identity Individuality. Concerns that the development of this site will compromise the identity and individuality of the local area is not in keeping with its historic nature. The proposed solar panels and hotel on the site is noted to be totally out of place for the quiet, rural land, and will overpower and dominate the nearby properties and approach to the conservation area of Mathern village. 7. Concerns re the removal of an essential part of the green belt/ wedge between Pwllmeyric, Hayes Gate and Mathern if this site is developed also reducing the amount of land for agriculture in the area. Responders note development of this site to be inappropriate and contrary to Planning Policy Wales Edition 11, severely affecting the rural setting and landscape of the surrounding villages. Concern that a high security fence surrounding the site will transform the area into an industrial landscape. Despite the constant expansion of the garden centre site opposite, this is still a quiet rural area and not one of industry and should therefore be kept that way. 8. Concerns re glare caused by the solar panels due to the site's proximity to the A48 Pwllmeyric major road, its visibility, and its openness to the surrounding landscape. The light reflected by the solar panels could dazzle drivers and cause a road traffic	1. Glamorgan Gwent Archaeological Trust Ltd 2. Mathern Community Council, Cllr Louise Brown plus 3 Private Individuals 3. Mathern Community Council, Cllr Louise Brown plus 7 Private Individuals 4. Mathern Community Council plus 4 Private Individuals 5. 2 Private Individuals 6. Mathern Community Council, Cllr Louise Brown plus 2 Private Individuals 7. Mathern Community Council, Cllr Louise Brown plus 5 Private Individuals 8. Cllr Louise Brown plus 3 Private Individuals 9. 2 Private Individuals 10. 2 Private Individuals 11. Cllr Louise Brown plus 2 Private Individuals 12. Cllr Louise Brown plus 1 Private Individual 13. 1 Private Individual 14. Mathern Community Council 15. 1 Private Individual 16. 1 Private Individual 17. 1 Private Individual

Page 1718	accident. The site is also looked down upon from the garden centre also causing glare issues. Responders believe solar panel sites should be in more isolated locations. Screening of the site will not be effective due to its lower position compared to the surrounding landscape. 9. Responders concerned that development are not sustainable or help to reducing the climate emergency, even with proposed mitigation strategies. 10. Concerns that a hotel by its very nature will increase noise and disturbance at all hours of the day. A growth of people in this currently quiet area will also increase littering, nuisance, and antisocial behaviour. Responders living in close proximity to the site note that it would result in a loss of privacy for their property, with the hotel possibly overlooking and dominating smaller buildings. 11. Responders believe there is no necessity for hotel accommodation in Pwllmeyric as there is already tourist accommodation at Mounton Brook Lodge, Willowbrook Guest House, Marriott St Pierre Hotel and Country Club, and the Two Rivers nearby. 12. Responder notes that the site does not lie in the boundaries of any of the villages and is also not located in any of the Less Constrained Solar Area laid out in the RLDP. 13. Development of the site would severely affect the conservation area of Mathern and Pwllmeyric and is not in keeping with this historic area. 14. Responder noted that a hotel would be better placed in Chepstow, where it could help to regenerate the town. 15. Responder notes that the allocation of this site only benefits the developers and makes them profit and that the site should not be allocated as Monmouthshire is not in a national growth area identified in Future Wales 2040. 16. Concerns re the affordability of housing in the area and that those who work the jobs brought about by the development of the hotel would not be able to afford to live in the area, further contributing to issues surrounding commuting. 17. Responder believes the consultation for the site should be extended as the site has not been highlighted to Chepstow, Pwllmeyric and Mather residents, being hidden in the rural plans.	
LPA Response	Comments noted. While internal and external consultee comments were obtained in relation to tourism sites, the proposed tourism policy approach in the Deposit Plan more appropriately allows for consideration of sustainable tourism related proposals, including beyond identified settlement boundaries. It is therefore not considered appropriate/necessary to identify site specific tourism related allocations in the RLDP. The solar element is not being progressed as an allocation due to concerns raised in relation to the site's proximity to the Gwent Levels Historic Landscape. Ecology concerns have also raised in relation to the presence of a SINC on site, as well as flood risk issues on the eastern edge of the site. In addition, the site is predominantly Grade 2 BMV land, with the Minster for Climate Change letter of 1st March 2022 noting that significant weight should be given to protecting BMV land where solar arrays are proposed and the availability of more suitable alternatives.	
LPA Recommendation	This site will not be allocated in the Deposit RLDP.	

Candidate Site: CS0231 West of Shirenewton Recreation Hall (Smaller Site), Shirenewton		Representor:
Page 1719	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as RED - HER details extensive prehistoric artefacts in the field and surrounding fields. Desk-based Assessment and geophysical survey prior to any determination of an application would inform mitigation, which may include further pre-determination work. 2. Concern re previous flooding in relation to drainage and sewerage management, with fields being flooded with raw sewerage from existing residents, and the implications caused by a new development on the site. 3. Concerns re lack of current infrastructure in the village such as public transport, broadband, shop, pub, post office, which will be even more insufficient after this site is developed. 4. The school has reached its maximum capacity and NHS service are being overwhelmed by current demands, which will only be exacerbated by a large increase in residents. 5. Concerns re the scale and over-bearing plans of new developments in proportion to the existing village and therefore its character and appearance, and a reduction in the open aspect of the village and its existing views, significantly expanding the size of the village. Concerns re the footpath used to access the school becoming suburban and hemmed in by development. 6. Concerns re an increase in traffic on the rural roads, as the only option for new residents would be to access facilities in neighbouring villages and towns using private vehicles. Adding more traffic because of an increase in residents will exacerbate congestion and pollution, there are no public charging points for electric vehicles and current infrastructure to support these schemes are not complete and plans are yet to be produced. Also concerns re the lack of safe pedestrian footpaths in the village and to walk to Chepstow and no dedicated cycle route as the country lanes can be dangerous for everyone. Responders note that the development will decrease access to the area and that there is already an issue with speeding. Because of the remote nature of the site and its lack of links to centres and amenities only further increases the necessity to use cars for transport. 7. Responders note that the development of the site would mean the loss of valuable green wedge land, important to the villages distinct sense of place and identity. The green space maintains the distinction between the countryside and the settlements and protects the open character and landscape of the area. It is also noted that the green space greatly benefits humans and wildlife and is an important component of the wildlife reserve. Concerned re development of grade one agriculture land being in contrast to the views of Future Wales 2040 which, prioritises the development of Newport, Cardiff, and the Valleys. 8. Concern re site being outside of defined village development boundary and would extend the village envelope. 9. Concerns re the villages lack of opportunities for sustainable growth in terms of employment as there are no SMEs to provide jobs. 10. Responders fail to see how development in the village will help the climate emergency. 11. Concerns of significant adverse effects on current residential amenity, by reason of noise disturbance, overlooking, loss of privacy, overshadowing etc. 12. Responder notes that local consultation should take place on the options before any individual sites are considered for inclusion in the allocation. 13. Concerns that the proposed candidate site is capable under MCC's housing density policy of up to 26 units, which, is far more than the settlement average.	1. Glamorgan Gwent Archaeological Trust Ltd 2. Shirenewton Community Council plus 5 Private Individuals 3. Shirenewton Community Council plus 6 Private Individuals 4. Shirenewton Community Council plus 3 Private Individuals 5. Shirenewton Community Council plus 7 Private Individuals 6. Shirenewton Community Council plus 6 Private Individuals 7. Shirenewton Community Council plus 5 Private Individuals 8. Shirenewton Community Council plus 4 Private Individuals 9. Shirenewton Community Council plus 1 Private Individual 10. 1 Private Individual 11. 2 Private Individuals 12. 1 Private Individual

	14. Responder believes the proposal to be alienating the people who have moved to the countryside for all of its benefits, driving them somewhere else and reducing the desirability of the village. This is detrimental to Monmouthshire and will take away the key reasons as to why residents want to live in Shirenewton. 15. Responder concerned that any alteration to the current drainage would adversely affect their property, causing erosion and undermining their boundary wall.	13. Shirenewton Community Council 14. 1 Private Individual 15. 1 Private Individual
LPA Response	Comments noted. Site not progressing as significant concerns have been raised in relation to heritage impact.	
LPA Recommendation	This site will not be allocated in the Deposit RLDP.	

Candidate Site: CS0232 Land West of Redd Landes, Shirenewton	Representor:
1. Glamorgan Gwent Archaeological Trust Ltd assess the site as RED - HER details extensive prehistoric artefacts in the field and surrounding fields. Desk-based Assessment and geophysical survey prior to any determination of an application would inform mitigation, which may include further pre-determination work. 2. Concern re previous flooding in relation to drainage and sewerage management, with fields being flooded with raw sewerage from existing residents, and the implications caused by a new development on the site. 3. Concerns re lack of current infrastructure in the village such as public transport, broadband, shop, pub, post office, which will be even more insufficient after this site is developed. 4. The school has reached its maximum capacity and NHS service are being overwhelmed by current demands, which will only be exacerbated by a large increase in residents. 5. Concerns re the scale and over-bearing plans of new developments in proportion to the existing village and therefore its character and appearance, and a reduction in the open aspect of the village and its existing views, significantly expanding the size of the village. Concerns re the footpath used to access the school becoming suburban and hemmed in by development. 6. Concerns re an increase in traffic on the rural roads, as the only option for new residents would be to access facilities in neighbouring villages and towns using private vehicles. Adding more traffic because of an increase in residents will exacerbate congestion and pollution, there are no public charging points for electric vehicles and current infrastructure to support these schemes are not complete and plans are yet to be produced. Also concerns re the lack of safe pedestrian footpaths in the village and to walk to Chepstow and no dedicated cycle route as the country lanes can be dangerous for everyone. Responders note that the development will decrease access to the area and that there is already an issue with speeding. Because of the remote nature of the site and its lack of links to centres and amenities only further increases the necessity to use cars for transport. 7. Responders note that the development of the site would mean the loss of valuable green wedge land, important to the villages distinct sense of place and identity. The green space maintains the distinction between the countryside and the settlements and protects the open character and landscape of the area. It is also noted that the green space greatly benefits humans and wildlife and is an important component of the wildlife reserve. Concerned re development of grade one agriculture land being in contrast to the views of Future Wales 2040 which, prioritises the development of Newport, Cardiff, and the Valleys. 8. Concern re site being outside of defined village development boundary and would extend the village envelope.	1. Glamorgan Gwent Archaeological Trust Ltd 2. Shirenewton Community Council plus 5 Private Individuals 3. Shirenewton Community Council plus 6 Private Individuals 4. Shirenewton Community Council plus 3 Private Individuals 5. Shirenewton Community Council plus 8 Private Individuals 6. Shirenewton Community Council plus 6 Private Individuals 7. Shirenewton Community Council plus 5 Private Individuals

	9. Concerns re the villages lack of opportunities for sustainable growth in terms of employment as there are no SMEs to provide jobs. 10. Responders fail to see how development in the village will help the climate emergency. 11. Concerns of significant adverse effects on current residential amenity, by reason of noise disturbance, overlooking, loss of privacy, overshadowing etc. 12. Responder notes that local consultation should take place on the options before any individual sites are considered for inclusion in the allocation. 13. Concerns that the proposed candidate site is capable under MCC's housing density policy of up to 26 units, which, is far more than the settlement average. 14. Responder believes the proposal to be alienating the people who have moved to the countryside for all of its benefits, driving them somewhere else and reducing the desirability of the village. This is detrimental to Monmouthshire and will take away the key reasons as to why residents want to live in Shirenewton. 15. Responders believe planned access is very dangerous as the hill is steep and the visibility is poor, posing an unacceptable level of risk. 16. Responder is in support of the site as they believe the site is technically deliverable, viable and developable and meets the requirements of the Preferred Strategy. The site has sound access off the public highway and could be developed without significantly affecting the setting of the existing village. The site has demonstrated as having no constraints that cannot be mitigated against. The responder believes that housing can be provided in one of the most sustainable villages in the county and asks the LPA to allocate the site in the deposit LDP.	8. Shirenewton Community Council plus 4 Private Individuals 9. Shirenewton Community Council plus 1 Private Individual 10. 1 Private Individual 11. 2 Private Individuals 12. 1 Private Individual 13. Shirenewton Community Council 14. 1 Private Individual 15. 2 Private Individuals 16. 1 Private Individual
LPA Response	Comments noted. A reduced area to the candidate site submission is proposed for allocation in the RLDP. Overall, the site performs well against the site search sequence. This site is located on the western edge of Shirenewton. While the site is partly Best and Most Versatile (BMV) agricultural land, it performs better in this respect compared to other Candidate Sites within the area as most have higher proportions of BMV agricultural land. The site benefits from excellent access to the recreation ground, play area and recreation hall due to its location opposite the site, and is also within walking distance of the primary school. The site meets key policy requirements, including 50% affordable housing and net zero carbon homes, demonstrating its viability and deliverability.	
LPA Recommendation	It is proposed to allocate the site for 26 dwellings with site specific policy requirements set out in Policy HA18 Land west of Redd Landes, Shirenewton.	
Candidate Site: CS0240 Land to the East of Mounton Court, Shirenewton		Representor:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as RED – HER details prehistoric artefacts and crop mark enclosures in the surrounding fields. Desk-based assessment and geophysical survey prior to any determination of an application would inform mitigation, which may include further pre-determination work. 2. Concern re previous flooding in relation to drainage and sewerage management, with fields being flooded with raw sewerage from existing residents, and the implications caused by a new development on the site. 3. Concerns re lack of current infrastructure in the village such as public transport, broadband, shop, pub, post office, which will be even more insufficient after this site is developed.	1. Glamorgan Gwent Archaeological Trust Ltd 2. Shirenewton Community Council plus 5 Private Individuals 3. Shirenewton Community Council

	4. The school has reached its maximum capacity and NHS service are being overwhelmed by current demands, which will only be exacerbated by a large increase in residents. 5. Concerns re the scale and over-bearing plans of new developments in proportion to the existing village and therefore its character and appearance, and a reduction in the open aspect of the village and its existing views, significantly expanding the size of the village. Concerns re the footpath used to access the school becoming suburban and hemmed in by development. 6. Concerns re an increase in traffic on the rural roads, as the only option for new residents would be to access facilities in neighbouring villages and towns using private vehicles. Adding more traffic because of an increase in residents will exacerbate congestion and pollution, there are no public charging points for electric vehicles and current infrastructure to support these schemes are not complete and plans are yet to be produced. Also concerns re the lack of safe pedestrian footpaths in the village and to walk to Chepstow and no dedicated cycle route as the country lanes can be dangerous for everyone. Responders note that the development will decrease access to the area and that there is already an issue with speeding. Because of the remote nature of the site and its lack of links to centres and amenities only further increases the necessity to use cars for transport. 7. Responders note that the development of the site would mean the loss of valuable green wedge land, important to the villages distinct sense of place and identity. The green space maintains the distinction between the countryside and the settlements and protects the open character and landscape of the area. It is also noted that the green space greatly benefits humans and wildlife and is an important component of the wildlife reserve. Concerned re development of grade one agriculture land being in contrast to the views of Future Wales 2040 which, prioritises the development of Newport, Cardiff, and the Valleys. 8. Concern re site being outside of defined village development boundary and would extend the village envelope. 9. Concerns re the villages lack of opportunities for sustainable growth in terms of employment as there are no SMEs to provide jobs. 10. Responders fail to see how development in the village will help the climate emergency. 11. Concerns of significant adverse effects on current residential amenity, by reason of noise disturbance, overlooking, loss of privacy, overshadowing etc. 12. Responder notes that local consultation should take place on the options before any individual sites are considered for inclusion in the allocation. 13. Concerns that the proposed candidate site is capable under MCC's housing density policy of up to 26 units, which, is far more than the settlement average. 14. Responder believes the proposal to be alienating the people who have moved to the countryside for all of its benefits, driving them somewhere else and reducing the desirability of the village. This is detrimental to Monmouthshire and will take away the key reasons as to why residents want to live in Shirenewton. 15. Responder believes the village of Shirenewton has no opportunity for sustainable growth in terms of employment. 16. Responder believes sites in rural areas should be allocated for self-build bungalows for a retiring population, freeing up existing family homes in the area. Responder also believes that a rural village is not the place to build affordable homes for young people and notes that they will be better served by a town with more facilities, access to transport and a wider availability of services.	plus 6 Private Individuals 4. Shirenewton Community Council plus 3 Private Individuals 5. Shirenewton Community Council plus 8 Private Individuals 6. Shirenewton Community Council plus 6 Private Individuals 7. Shirenewton Community Council plus 5 Private Individuals 8. Shirenewton Community Council plus 4 Private Individuals 9. Shirenewton Community Council plus 1 Private Individual 10. 1 Private Individual 11. 2 Private Individuals 12. 1 Private Individual 13. Shirenewton Community Council 14. 1 Private Individual 15. 2 Private Individuals 16. 1 Private Individual
LPA Response	Comments noted. Site not progressing as concerns have been raised in relation to highway impact.	

LPA Recommendation	This site will not be allocated in the Deposit RLDP.

Candidate Site: CS0244 Land West of Ditch Hill Lane, Shirenewton	Representor:
1. Glamorgan Gwent Archaeological Trust Ltd assess the site as RED – Coxe's Well marked at the eastern periphery, other springs marked on historical mapping; the Well is marked as a Brake on the Tithe Map. HER details extensive prehistoric artefacts and cropmarks, and enclosure of potential Iron Age / Roman date in the field and surrounding fields. Desk-based assessment and geophysical survey prior to any determination of an application would inform mitigation, which may include further pre-determination work. 2. Concern re previous flooding in relation to drainage and sewerage management, with fields being flooded with raw sewerage from existing residents, and the implications caused by a new development on the site. 3. Concerns re lack of current infrastructure in the village such as public transport, broadband, shop, pub, post office, which will be even more insufficient after this site is developed. 4. The school has reached its maximum capacity and NHS service are being overwhelmed by current demands, which will only be exacerbated by a large increase in residents. 5. Concerns re the scale and over-bearing plans of new developments in proportion to the existing village and therefore its character and appearance, and a reduction in the open aspect of the village and its existing views, significantly expanding the size of the village. 6. Concerns re an increase in traffic on the rural roads, as the only option for new residents would be to access facilities in neighbouring villages and towns using private vehicles. Adding more traffic because of an increase in residents will exacerbate congestion and pollution, there are no public charging points for electric vehicles and current infrastructure to support these schemes are not complete and plans are yet to be produced. Also concerns re the lack of safe pedestrian footpaths in the village and to walk to Chepstow and no dedicated cycle route as the country lanes can be dangerous for everyone. Responders note that the development will decrease access to the area and that there is already an issue with speeding. Because of the remote nature of the site and its lack of links to centres and amenities only further increases the necessity to use cars for transport. 7. Responders note that the development of the site would mean the loss of valuable green wedge land, important to the villages distinct sense of place and identity. The green space maintains the distinction between the countryside and the settlements and protects the open character and landscape of the area. It is also noted that the green space greatly benefits humans and wildlife and is an important component of the wildlife reserve. Concerned re development of grade one agriculture land being in contrast to the views of Future Wales 2040 which, prioritises the development of Newport, Cardiff, and the Valleys. 8. Concern re site being outside of defined village development boundary and would extend the village envelope. 9. Concerns re the villages lack of opportunities for sustainable growth in terms of employment as there are no SMEs to provide jobs. 10. Responders fail to see how development in the village will help the climate emergency. 11. Concerns of significant adverse effects on current residential amenity, by reason of noise disturbance, overlooking, loss of privacy, overshadowing etc.	1. Glamorgan Gwent Archaeological Trust Ltd 2. Shirenewton Community Council plus 6 Private Individuals 3. Shirenewton Community Council plus 7 Private Individuals 4. Shirenewton Community Council plus 3 Private Individuals 5. Shirenewton Community Council plus 8 Private Individuals 6. Shirenewton Community Council plus 7 Private Individuals 7. Shirenewton Community Council plus 6 Private Individuals 8. Shirenewton Community Council plus 3 Private Individuals 9. Shirenewton Community Council plus 1 Private Individual 10. 1 Private Individual

	12. Responder notes that local consultation should take place on the options before any individual sites are considered for inclusion in the allocation. 13. Concerns that the proposed candidate site is capable under MCC's housing density policy of up to 26 units, which, is far more than the settlement average. 14. Responder believes the proposal to be alienating the people who have moved to the countryside for all of its benefits, driving them somewhere else and reducing the desirability of the village. This is detrimental to Monmouthshire and will take away the key reasons as to why residents want to live in Shirenewton. 15. Responder notes that the site is surrounded by the indicative green belt in Future Wales Plan 2040 and therefore, development would be contrary to Planning Policy Wales Edition 11. The site would also be too close to Mynydbach and there needs to be a distinction between the two.	11. 3 Private Individuals 12. 1 Private Individual 13. Shirenewton Community Council 14. 1 Private Individual 15. Cllr Louise Brown
LPA Response	Comments noted. Site is not allocated as there is sufficient and more suitable land available for residential development within the Main Rural Settlement of Shirenewton to accommodate its housing need.	
LPA Recommendation	This site will not be allocated in the Deposit RLDP.	

St Arvans

Candidate Site: CS0003 Livox Quarry		Representor:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red. The HER notes finds of prehistoric date, and Medieval and post-medieval artefacts also. Outside but near to the boundary are Scheduled Monuments of Roman and Modern date. Desk-based assessment and geophysical survey prior to any determination of an application would inform mitigation, which may include further pre-determination work. Also within the Registered Landscape of Outstanding Historic Interest of the Lower Wye Valley, in character area HLCA007 Livox Farm, consult Cadw regarding the need for an ASIDOHL to determine the impact on this.	1. Glamorgan Gwent Archaeologic Trust Ltd
LPA Response	Comment noted. While internal and external consultee comments were obtained on tourism sites, the proposed tourism policy approach in the Deposit Plan more appropriately allows for consideration of sustainable tourism related proposals, including beyond identified settlement boundaries. It is therefore not considered appropriate/necessary to identify site specific tourism related allocations in the RLDP.	
LPA Recommendation	This site will not be allocated in the Deposit RLDP.	

Candidate Site: CS0077 Adj Piercefield Public House, St Arvans		Representor:
Page 1725	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Amber. HER notes route of a Roman road at the east of the site area marked as orchard on historic mapping. Development could be mitigated by condition, in accordance with an agreed Written Scheme of Historic Environment Mitigation. 2. A responder states that the land provides habitat for wildlife including badgers, hedgehogs, bats, owls and mice, all of which would face a loss of habitat if the site was developed as all other local fields are used for livestock and are therefore unsuitable for this wildlife. 3. Concerns regarding capacity of the water treatment plant. 4. Concerns as the access for the site is likely to be opposite a busy pre-school nursery and other entrances and junctions on this busy road. 5. SEWRIGS group state that the site lies within the Otter Hole RIGS on Datamap Wales, but the site is listed for the Otter Hole Cave system underground. The impact of proposed developments will depend on the nature of the RIGS feature, so early consultation with the local RIGS group or NRW is strongly recommended. 6. A responder states that the land has not been used for agricultural purposes for many but is largely abandoned and is known to have Japanese knotweed in several locations. 7. Concerns regarding a loss of privacy to properties and gardens. 8. The site sponsor, Marston's PLC, has submitted supporting information and makes the following points: • A Flood Consequence Assessment & Drainage Strategy was commissioned which confirms that the site is considered appropriate for residential purposes in terms of national and local planning policy for flood risk. • Following assessment through a Landscape and Visual Impact Assessment the Illustrative Masterplan has emerged which ensures that the proposed development would assimilate carefully into its surrounds and would avoid any harm to the AONB. • The site is located immediately adjacent to the A466 and also benefits from having bus stops immediately adjacent. • A Viability Assessment demonstrated that the proposals could meet all S106 obligations and infrastructure requirements including 50% affordable housing. • The Illustrative Masterplan demonstrates that the site would be GI led in excess of 40% on site and would provide opportunities for biodiversity habitat and net-gain. • St Arvans is one of the most disproportionately aging communities in the County and so growth of the village through delivery of the site would serve to meet the requirements of local planning policy relating to demographic rebalancing of rural communities. • A Preliminary Ecological Appraisal concluded that the proposals have sought to minimise impacts and subject to the implementation of appropriate avoidance, mitigation and compensation measures, it is unlikely that the proposals will result in significant harm to biodiversity.	1. Glamorgan Gwent Archaeological Trust Ltd 2. 1 Private Individual 3. 1 Private Individual 4. 1 Private Individual 5. SEWRIGS group plus 2 Private Individuals 6. 1 Private Individual 7. 1 Private Individual 8. Marston's PLC

LPA Response	Comments noted. The site performs well against the assessment methodology with no fundamental constraints identified. Although within the Wye Valley National Landscape (AONB), the proposal is small scale and the landscape assessment has demonstrated limited harm. The site also meets key policy requirements, including 50% affordable housing and net zero carbon homes, demonstrating its viability and deliverability.
LPA Recommendation	It is proposed to allocate the site for approximately 16 dwellings with site specific policy requirements set out in Policy HA13 Land adjacent to Piercefield Public House, St. Arvans.

Candidate Site: CS00223 Land at New Barn Workshop, St Arvans		Representor:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Amber. HER notes route of a Roman road at the north of the site; adjoining field has find spots of prehistoric and 8th century artefacts. Development could be mitigated by condition, in accordance with an agreed Written Scheme of Historic Environment Mitigation.	1. Glamorgan Gwent Archaeologic Trust Ltd
LPA Response	Comment noted. While internal and external consultee comments were obtained on tourism sites, the proposed tourism policy approach in the Deposit Plan more appropriately allows for consideration of sustainable tourism related proposals, including beyond identified settlement boundaries. It is therefore not considered appropriate/necessary to identify site specific tourism related allocations in the RLDP.	
LPA Recommendation	This site will not be allocated in the Deposit RLDP.	

Trellech

Candidate Site: CS0092 Monmouth Road, Trellech		Representor:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Amber. Following archaeological field evaluation, it was recommended that development be mitigated by condition, in accordance with an agreed Written Scheme of Historic Environment Mitigation.	1. Glamorgan Gwent Archaeological Trust Ltd
LPA Response	Comment noted. Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements. In addition, there is no capacity at the Trellech WwTW to accommodate foul flows from the site.	
LPA Recommendation	This site will not be allocated in the Deposit RLDP.	

Candidate Site: CS0234 East of De Clere Way, Trellech		Representor:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red – Partly with the Trellech Archaeologically Sensitive Area, archaeological evaluation adjacent encountered Medieval remains. Geophysical survey and field evaluation prior to determination of any application.	1. Glamorgan Gwent Archaeological Trust Ltd
LPA Response	Comment noted. Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements. In addition, there is no capacity at the Trellech WwTW to accommodate foul flows from the site.	
LPA Recommendation	This site will not be allocated in the Deposit RLDP.	

Werngifford Pandy

Candidate Site: CS0219 Land at Sun Meadow		Representor:
	No responses received.	
LPA Response	Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements. In addition, there is no capacity at the Pandy WwTW to accommodate foul flows from the site and there are concerns over flooding on the access to the site.	
LPA Recommendation	This site will not be allocated in the Deposit RLDP.	

Candidate Sites for Protection

Abergavenny & Llanfoist

Candidate Site: CSP001 Gavenny Valley, Abergavenny		Representor:
Page 1728	1. Support for inclusion as part of a policy for a Green Wedge buffer between the built-up area and the National Park and to protect the lower sides of the Gavenny Valley between the built-up area and the railway/A465 from further development. 2. Responders state that the steeply sloping wooded lower part of the site is a SINC including floodplains which have their own unique biodiversity and a developed species hierarchy. 3. Concerns that the site is partly liable to flood, absorbing excess rainfall which prevents flooding of existing homes and the risk of subsidence. 4. Concerns that an ancient woodland SSSI crosses the site providing an east-west wildlife corridor. Development would require access from Ross Road via a small area of level field and a breech in the SSSI. There are many trees on site subject to TPOs. 5. Concern about the impact of any development on the river quality. The river supports many species, some protected under the Wildlife and Countryside Act 1981, such as brown trout, otters, white-clawed crayfish, kingfishers, dippers, various birds of prey and various bats. 6. Abergavenny Town Council state that the site is within the setting of St Teilo's Church, a Grade 1 Listed Building. A responder also mentions the presence of World War 2 Pill Boxes and an Air Raid Shelter which should be preserved. 7. Responders state that the preservation of this site supports MCC, Welsh Government and NRW environmental policies and addresses the Climate and Nature Emergencies called by WG. 8. Responders state that the site provides access to dark skies. 9. Responders state that the woodland helps to reduce noise from the A465. 10. Responders state that the site provides valuable amenity space giving easy access to beautiful walks benefiting both mental and physical wellbeing. A responder believes the site meets DES2 criteria. 11. Responders state that the site provides uninterrupted countryside views to Skirrid Mountain; development would alter the skyline for the worse. 12. Responders state that the previous MCC Ecological Site Assessment (previous LDP/CS0054) recommended that the development of a high proportion of the site should be avoided. 13. Responders state that the site is important for tourism in the area, supporting existing holiday accommodation. Feedback from visitors confirms appreciation for this unspoilt area so close to the town. 14. Abergavenny & District Civic Society suggest the site may be Grade 3a agricultural land. 15. Concerns for the loss of undeveloped land; brownfield sites should be developed. 16. Concerns for the increase in traffic and pollution that development would bring. 17. Concerns for building more homes when a number of houses in the area remain unoccupied.	1. Abergavenny Town Council plus 16 Private Individuals 2. Abergavenny Town Council, Abergavenny & District Civic Society plus 15 Private Individuals 3. Abergavenny Town Council, plus 16 Private Individuals 4. Abergavenny & District Civic Society plus 20 Private Individuals 5. Abergavenny Town Council, Abergavenny & District Civic Society, plus 23 Private Individuals 6. Abergavenny Town Council plus 2 Private Individuals 7. 10 Private Individuals 8. 6 Private Individuals 9. 10 Private Individuals 10. 13 Private Individuals 11. 5 Private Individuals 12. 1 Private Individual 13. 2 Private Individuals 14. Abergavenny & District Civic Society 15. 5 Private Individual 16. 5 Private Individual 17. 2 Private Individuals

LPA Response	Comments noted. The site has been considered as part of the review of Areas of Amenity Importance which concludes that apart from Croesonen Parc, which will be designated separately, the site is mostly private, inaccessible and considered to be Open Countryside.
LPA Recommendation	The site is therefore not suitable for designation as an Area of Amenity Importance.

Candidate Site: CSP002 Western Abergavenny		Responder:
	1. General support for protection as a buffer to the National Park; to be retained as a Green Wedge. 2. Abergavenny Town Council and Abergavenny & District Civic Society state that the site forms the National Park buffer zone proposal which could allow for a trunk road by-pass. 3. Abergavenny Town Council and Abergavenny & District Civic Society raise concerns that a flood risk from mountain streams may impact any development on the site. 4. Abergavenny & District Civic Society state that the site is Grade 3a agricultural land quality.	1. 2 Private Individuals 2. Abergavenny Town Council, Abergavenny & District Civic Society 3. Abergavenny Town Council, Abergavenny & District Civic Society 4. Abergavenny & District Civic Society

LPA Response	Comments noted. The site is located outside the settlement boundary and is therefore considered to have sufficient protection as any proposals would be assessed against national and local policy requirements relating to open countryside locations.
LPA Recommendation	The candidate site has also been assessed as part of the Green Wedge Assessment and in accordance with the review's findings, the relevant sections of the site have been designated as green wedge.

Candidate Site: CSP003 Land at Pentre Road, Abergavenny		Responder:
	1. General support for protection as a buffer to the National Park; to be retained as a Green Wedge. 2. Abergavenny Town Council state that the site is steeply sloped and prominent to views from the south with no mitigating green infrastructure that would help to absorb any development into the landscape. 3. Abergavenny Town Council state that a thick hedgerow on the western boundary must be safeguarded. 4. Responders feel that the woodland is an important element of the town's green infrastructure. 5. Responders state that the site offers iconic views of The Sugar Loaf Mountain and along with the unspoilt nature of the landscape is a key asset to Abergavenny's tourism. 6. Responders state that the site on the border of the Abergavenny Conservation Area and that four of the eleven fields which constitute the site are registered as SINCs. The fields are therefore of very high ecological value, supporting a high level of natural wildlife including birds of prey and mammals, and should be protected. 7. Concerns that residential development will increase light pollution adversely affecting nocturnal wildlife in the BBNP. 8. SOUL state that many of the lanes which surround or cross the site are single track providing excellent conditions for walking and exercise. 9. Responders state that these lanes provide access to The Sugar Loaf, St Mary's Vale and The Vineyard for serious walkers, visiting tourists and locals and act as a natural boundary between the town development and the countryside.	1. Abergavenny Town Council, SOUL, 208 Private Individuals 2. Abergavenny Town Council plus 7 Private Individual 3. Abergavenny Town Council 4. Abergavenny Town Council, 1 Private Individual 5. SOUL, 19 Private Individual 6. SOUL plus 17 Private Individuals 7. 2 Private Individuals 8. SOUL plus 12 Private Individual

	10. A responder states that the site provides connectivity with the green infrastructure of the town – linking the National Park and Conservation Area designations to the town's green spaces. 11. There is concern that allowing development at this site would set a precedent for other sites in the area. 12. Responders felt that the site is has no local shops and only a two-hourly bus service and that any residential development would be up to 2km from the town centre services. 13. Traffic issues were raised with concerns that any development would increase traffic and may require a new junction with the A40. Access would be through narrow, often single lane, streets which are not suitable for through traffic. These narrow lanes would make Active Travel difficult. 14. Concerns re pollution from an increase in traffic from development. 15. Concerns that there is no infrastructure to support any development here, no extra jobs, schools, shops, medical facilities. 16. Concerns re drainage problems in the area and the increased risk of run-off water during heavy rainfall. 17. The 11 fields, which occupy the proposed Green Wedge, are of high quality land offering grazing to horses, cattle and sheep. 18. Better development options are available on the site east of the A465, and the railway station, and vacant buildings, and brownfield sites, within the town could be utilised.	9. SOUL, 10 Private Individuals 10. 2 Private Individual 11. Abergavenny Town Council 12. Abergavenny Town Council plus 2 Private Individual 13. Abergavenny Town Council plus 14 Private Individual 14. 1 Private Individual 15. 2 Private Individual 16. 1 Private Individual 17. 5 Private Individual 18. 3 Private Individual
LPA Response	Comments noted. The site is located outside the settlement boundary and is therefore considered to have sufficient protection as any proposals would be assessed against national and local policy requirements relating to open countryside locations.	
LPA Recommendation	The candidate site has also been assessed as part of the Green Wedge Assessment and consistent with its findings the site is designated as a Green Wedge in the RLDP.	

Candidate Site: CSP004 Land north of Abergavenny

		Responder:
	1. General support for protection as a buffer to the National Park; to be retained as a Green Wedge. 2. Concerns were raised regarding the slope of the site, and its prominence in views from the east, and the lack of green infrastructure to help it blend into the landscape. 3. A responder states that the area is of high visual landscape importance, highly visible from popular tourist routes to the Sugarloaf. It provides the setting for the National Park, with iconic views towards the Sugarloaf Mountain and St Mary's Vale as well as the setting for the Abergavenny Conservation Area. It also provides connectivity with the green infrastructure of the town, linking the National Park, Conservation Area designations and the town's green spaces such as Bailey Park. 4. SOUL state that four of the eleven fields which constitute the site are registered as SINCs. Development of this site would have a negative effect on the Conservation Area which abuts it. 5. SOUL state that many of the lanes which surround or cross the site are single track providing excellent conditions for walking and exercise. 6. SOUL state that these lanes provide access to The Sugar Loaf, St Mary's Vale and The Vineyard for serious walkers, visiting tourists and locals. 7. Traffic issues were raised with concerns that any development would increase traffic on Old Hereford Road which would further overload Pen y Pound and its junction with the A40. 8. Responders suggest that the slope of the site might render substantial Active Travel unlikely and would limit access to existing shops and of the town centre by foot, therefore, requiring a frequent bus service / increased use of the car.	1. Abergavenny Town Council, SOUL plus 1 Private Individual 2. Abergavenny Town Council plus 1 Private Individual 3. SOUL plus 1 Private Individual 4. SOUL 5. SOUL 6. SOUL 7. Abergavenny Town Council 8. Abergavenny Town Council 9. Abergavenny Town Council 10. Abergavenny Town Council

	9. There is concern that allowing development at this site would set a precedent for other sites in the area. 10. The woodland is an important element of the town's green infrastructure as an extension to the Deri woodlands and prominent from the east.	
LPA Response	Comments noted. The site has been assessed as part of the Green Wedge Assessment and consistent with its recommendations the northern slither of land, adjoining the BBNP boundary, has been designated as a Green Wedge due to its function in relation to the protection of Abergavenny's setting with the BBNP. However, the Green Wedge Assessment also concludes that the southern section of the site has a moderate buffer role and therefore a green wedge designation is not considered appropriate. Consistent with national guidance, which allows for green wedge and settlement boundaries to make provision for a sufficient range of development land which is suitably located in relation to the existing urban edge should be made available, having regard to the longer-term need for development land, the effects of development pressures in areas beyond the green wedge and the need to minimise demand for travel.	
LPA Recommendation	It is proposed to allocate the site for 100 dwellings with site specific policy requirements set out in Policy HA5 Land at Penlanlas Farm, Abergavenny.	

Chepstow

Candidate Site: CSP017 Land at Bayfield, Chepstow		Representor:
	1. Support for the proposal to protect this site - the site should be protected to maintain the open field, rolling landscape which creates a visual distinction between town and the recognised AONB and ancient woodland. 2. Concerns that development on land abutting an AONB could set a precedent for building on other sites like this and destroy what makes Monmouthshire so special.	1. 1 Private Individual 2. 1 Private Individual
LPA Response	Comments noted. The site is located outside the settlement boundary and is therefore considered to have sufficient protection as any proposals would be assessed against national and local policy requirements relating to open countryside locations. A site-specific protection designation is therefore not considered necessary in addition to the policy protection proposed in the Plan.	
LPA Recommendation	This site will not be allocated in the Deposit RLDP.	

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APPENDIX 7

Replacement Local Development Plan 2018-2033

Candidate Site Assessment Report 2024

monmouthshire sir fynwy

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Candidate Site Assessment Report

1. Introduction

1.1. The purpose of this report is to outline the findings of the Candidate Site Assessment process for the consideration of land for development and protection in the Replacement Local Development Plan (RLDP). It provides an overview of the candidate site assessment process from the Second Call for Candidate Sites to the proposed Deposit Plan allocations.

2. Call for Candidate Sites

2.1. As part of the RLDP preparation process, the Council invited landowners, developers and the public to put forward 'Candidate Sites' to be considered for development, redevelopment or protection in the Monmouthshire RLDP. This was undertaken via a two-stage Call for Candidate Sites in accordance with the South East Wales Strategic Planning Group (SEWSPG) methodology.

2.2. An Initial Call for Candidate Sites was undertaken over a 16-week period from the 30th July 2018 to 19th November 2018. The purpose of inviting Candidate Site submissions at this stage was to assist the Council in understanding what land was available to inform the RLDP Preferred Strategy. A total of 204 Candidate Sites were submitted for development/redevelopment for a range of uses including residential, employment and recreation uses. A total of 16 sites were also submitted for protection.

2.3. The Second Call for Candidate Sites took place for an 8-week period from the 5th July 2021 to 31st August 2021. The purpose of the Second Call for Candidate Sites was to invite the submission of new sites for potential inclusion in the RLDP that accord with the Preferred Strategy (together with supporting information), and to seek the submission of additional supporting information for existing Candidate Site submitted during the Initial Call. A total of 159 Candidate Sites were submitted for a range of uses including residential, employment, and recreation uses. A combined total of 20 Candidate Sites were submitted for protection, this includes sites carried forward from the Initial Call for Sites. Sites that were not resubmitted following the Initial Call for Candidate Sites no longer formed part of the Candidate Site process and are listed in Appendix 1.

2.4. A further candidate site was submitted as part of the Preferred Strategy consultation that took place between 5th December 2022 and 30th January 2023.

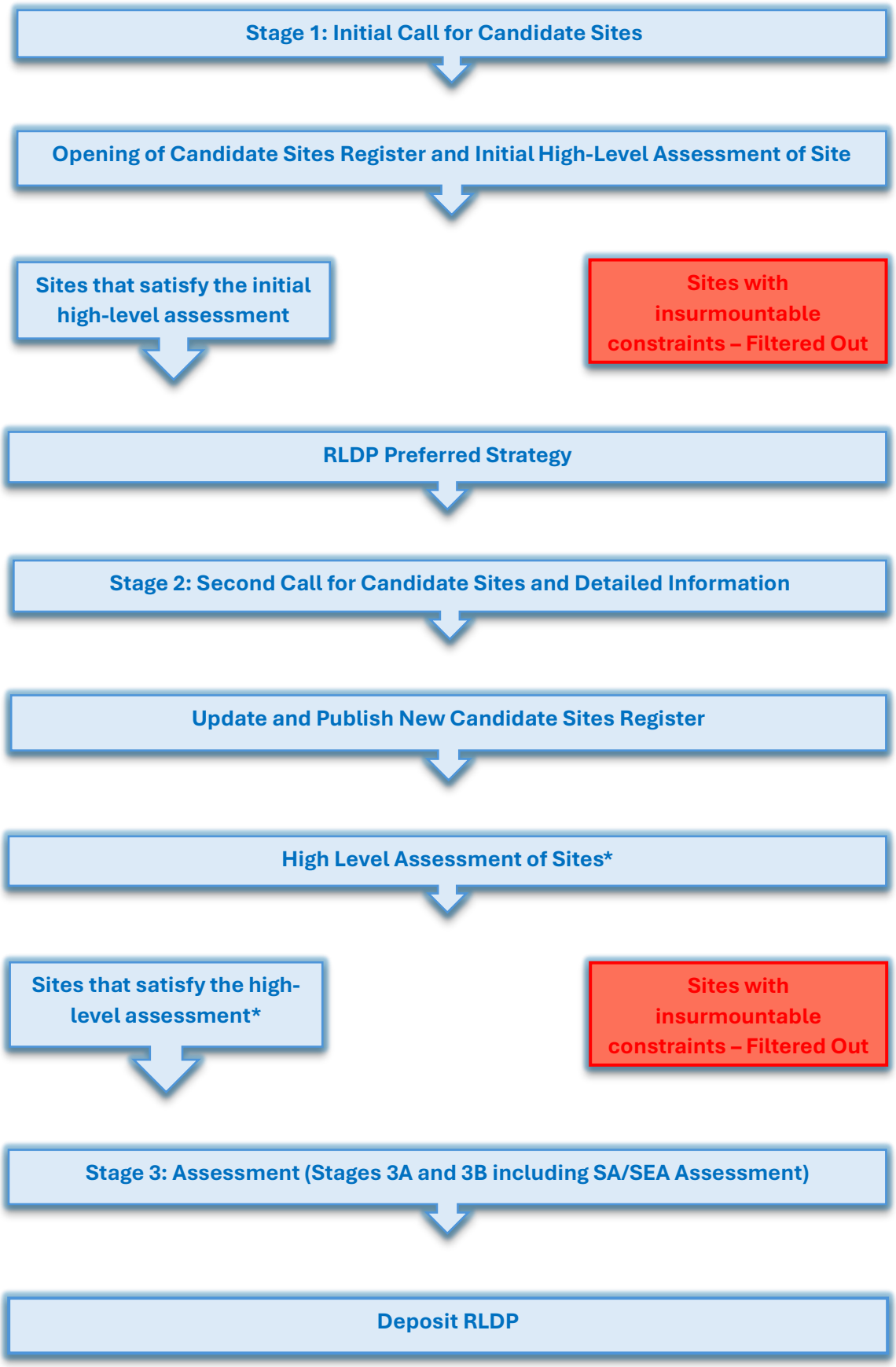
3. Candidate Site Register

3.1. All sites submitted at the Second Call for Candidate Sites and Preferred Strategy Consultation stages have been published in a Candidate Site Register. Consultation on the Candidate Site Register ran alongside the Preferred Strategy consultation between 5th December 2022 and 30th January 2023.

4. Candidate Site Assessment

4.1. An overview of the Candidate Site Process is set out in Figure 1 below. Full details of each stage are set out in the Candidate Sites Assessment Methodology Background Paper.

Figure 1: Overview of the Candidate Sites Process (adapted from SEWSPG methodology)



*Additional stage not contained in SEWSPG methodology.

5. Candidate Sites Assessment of Sites Submitted for Development

5.1. As noted above, sites that were not resubmitted at the Second Call for Candidate Sites did not progress in the process. Only sites submitted at the Second Call for Candidate Sites were subject to the high-level assessment associated with Stage 2. Those sites that progressed past Stage 2, were then subjected to Stages 3a and 3b including ISA/SEA assessment. A brief overview of the different stages is set out below with additional information available in the Candidate Site Assessment Methodology Background Paper.

Stage 2 – High Level Assessment

5.2. Following the Second Call for Candidates Sites a high-level assessment was undertaken involving a desk-based assessment of all submitted sites, identifying and discarding sites that did not meet the following initial filtering assessment criteria:

- Compatibility with the RLDP Preferred Strategy
- Site size
- Fundamental Constraints
- Submission of Site Viability Evidence

5.3. Sites that did not meet any of the above criteria were filtered out and not considered further in the RLDP process and are identified in table 1 with a ✘ under the Stage 2 column.

Stage 3 – Detailed Assessment

5.4. Stage 3 of the Candidate Sites Assessment involved two stages:

- Stage 3A: officer level detailed assessment using a 'traffic light' coding system, incorporation of comments from internal departments of the Council and an assessment against the Council's ISA/SEA Framework.
- Stage 3B: external consultation with statutory agencies including Dwr Cymru Welsh Water and Natural Resources Wales (NRW).

5.5. Following the completion of Stages 3A and 3B, some sites were not considered suitable as a potential allocation in the RLDP and were sifted out of the process and given no further consideration in the assessment. Examples include where a statutory agency identified a fundamental constraint that could not be overcome. These sites are identified in Table 1 with a ✘ in the column titled 'Site Progressed past Stage 3A/3B'.

6. Sites Not Assessed at Stage 3

6.1. While undertaking Stage 3 of the assessment process, it became apparent that some candidate sites would be better assessed via a different process or did not require a detailed assessment as a result of the emerging Deposit Plan policy framework facilitating consideration of the sites via the planning application process. These involved the following:

6.2. **Small scale candidate sites:** the Stage 2 methodology notes that sites of less than 5 units would be considered via the settlement boundary review. However, following

further analysis during stage 3, additional sites of greater than 5 units but small scale in nature were also considered to be too small for allocation and more appropriately considered as part of the settlement boundary review.

6.3. Tourism Candidate Sites: While internal and external consultee comments were obtained on these sites, the proposed tourism policy approach in the Deposit Plan more appropriately allows for consideration of sustainable tourism related proposals, including beyond identified settlement boundaries. It was therefore not considered appropriate/necessary to identify site specific tourism related allocations in the RLDP.

7. Candidate Sites Submitted for Protection

7.1. Sites for a range of protection policy options were also submitted as part of the Call for Candidate Sites. These were considered to be most appropriately assessed via other mechanisms forming part of the RLDP evidence base. These included:

7.2. Green Wedges: A number of protection candidate sites were submitted seeking protection as a buffer to the BBNP. These sites have been considered as part of the Green Wedge Assessment undertaken to inform the RLDP.

7.3. Areas of Amenity Importance: Sites put forward as potential amenity areas have been considered as part of the review of Areas of Amenity Importance for the RLDP.

7.4. Natural Flood Management/Retrofit of Sustainable Drainage Measures: These sites were forwarded to the Council's Flood Risk Management Team for consideration. However, natural flood management proposals such as additional tree planting or sustainable drainage measures to enhance the site's flood management role can be considered outside of the RLDP or within its policy framework where planning permission is required, and therefore do not require a specific allocation in the Plan.

7.5. Protection from Development: A number of sites were put forward for to be protected from development. In all cases these are located outside of the settlement boundary and are therefore considered to have sufficient protection as any proposals would be assessed against national and local policy requirements relating to open countryside locations. A site-specific protection designation is therefore not considered necessary in addition to the policy protection proposed in the RLDP.

8. Integrated Sustainability Appraisal (ISA)

8.1. As noted above, Stage 3 of the Candidate Site assessment process integrates a sustainability assessment into the site selection process, based on the sustainability objectives/themes developed for the RLDP ISA. In this context, a sustainability appraisal of all candidate sites progressing past Stage 2 has been undertaken. In line with the Development Plans Manual, separate, more spatially specific and quantitative criteria have been developed to assess candidate sites through the ISA, which builds on the ISA Framework developed at the scoping stage. The methodology for the ISA of candidate sites involves employing GIS data-sets and measuring (quantitative analysis) of how each candidate site relates to various constraints and opportunity features. Specifically, the aim is to differentiate the performance of the candidate sites in respect of specific locational (e.g. distance to different types of services) / locational (e.g. intersect with flood risk zone) criteria. The ISA methodology allows for the consistent and transparent assessment of candidate sites. Further details on the

sustainability assessment of the candidate sites can be found in the Integrated Sustainability Assessment Report.

9. Sites Taken Forward as Deposit Allocations

9.1. Following the completion of the above stages, a list of sites has been identified for inclusion in the Deposit Plan for a range of uses including residential and employment. These are identified in Table 1 and are included within the Deposit Plan. Once identified as potential allocations, consultations and dialogue with external and internal stakeholders, as well as site promoters, has continued and has formed the basis for the site allocation policies contained within the Deposit Plan. This dialogue will be ongoing throughout the Plan process.

Settlement (Ward)	Candidate Site Ref	Site Name	Proposed Use	Site progressed past Stage 2	Site progressed past Stage 3A/3B	Site taken forward as a Deposit Allocation	Comments
Primary Settlements: Abergavenny							
Abergavenny (Cantref)	CS0056	Land south Brecon Road	Residential	✓	✗		Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements. Landscape impact concerns have also been raised in relation to the site's allocation. In addition, the site is identified as a Green Wedge as part of the Green Wedge Assessment which has been undertaken to support the RLDP. Therefore, this site will not be allocated in the RLDP.
Abergavenny (Llanfoist Fawr)	CS0089	Land adjacent to Beech Grove	Residential	✗			Viability Assessment not submitted to support proposal. The site was therefore not assessed as part of Stage 3A/3B and has not progressed further in the candidate site assessment process.
Abergavenny (Mardy)	CS0094	Land at Penlanlas Farm	Residential	✓	✓	✓	Overall, the site performs well against the assessment methodology with no fundamental constraints identified. The site also benefits from good access to a range of services including schools and open space. A significant proportion of the site is also identified as being non-BMV land (63%), which performs well in a Monmouthshire context. The site also meets key policy requirements including 50% affordable housing and net zero carbon homes demonstrating its viability and deliverability. It is therefore proposed to allocate the site for 100 dwellings.
Abergavenny (Mardy)	CS0108	Land north of Hillgrove Avenue	Residential	✓	✗		Site is not progressing as the highway authority has raised significant concerns in relation to achieving suitable access arrangements. Landscape impact concerns have also been raised reflecting the lack of supporting information with the submission and the likely significant adverse visual impact on the Landscape Character Area. Overall, there are considered to be more suitable sites available in Abergavenny and therefore the site will not be allocated in the RLDP.
Abergavenny (Cantref)	CS0128	Land at Chapel Farm	Residential	✓	✗		Site not progressing as there are unresolved concerns regarding highways and access arrangements including flood risk to the south of the site onto Pentre Road and the suitability of the alternative access onto Pentre Lane. The whole site is also Grade 2 BMV agricultural land and there are more suitable alternatives site with lower grade agricultural land in Abergavenny. In

Settlement (Ward)	Candidate Site Ref	Site Name	Proposed Use	Site progressed past Stage 2	Site progressed past Stage 3A/3B	Site taken forward as a Deposit Allocation	Comments
							addition, the site is identified as a Green Wedge following the Green Wedge Assessment. Overall, there are considered to be more suitable sites available in Abergavenny and therefore the site will not be allocated in the RLDP.
Abergavenny (Lansdown)	CS0161	Land north of Hillside	Residential	✓	✗		Site not progressing due to concerns raised by CADW in relation to the western part of candidate site being inside the boundaries of The Hill registered historic park and garden, with the rest of the area being an essential part of its setting. Concerns have also been raised in relation to the ecological impact development would have. In addition, the site is identified as a Green Wedge following the Green Wedge Assessment. Overall, it is considered that the desired levels of growth can be accommodated on less sensitive sites within the area. Therefore, this site will not be allocated in the RLDP.
Abergavenny (Grofield)	CS0164	Land adjacent to Red Barn Farm (RBF1)	Residential	✓	✗		Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements. The site is also wholly grade 2 BMV agricultural land and there are more suitable alternatives site with lower grade agricultural land in Abergavenny. Concerns have also been raised in relation to the impact on the setting of the listed building. Therefore, the site will not be allocated in the RLDP.
Abergavenny (Mardy)	CS0174	Nantgavenny Lane	Residential	✗			Viability Assessment not submitted to support proposal. The site was therefore not assessed as part of Stage 3A/3B and has not progressed further in the candidate site assessment process.
Abergavenny (Grofield)	CS0178	The Abergavenny Workhouse (excluding residential)	Mixed Use: Retail/Professional services/Food outlets (A1/A2/A3), Employment (B1/B2/B8), Health/leisure (D1/D2) and Sui Generis	✓	✗		Site not progressing as while it performs well against the site search sequence criteria, insufficient information has been submitted to undertake a full assessment. Therefore, the site will not be allocated in the RLDP. However, given the site's location within the settlement boundary proposals can be pursued via the planning application system, subject to detailed planning policies.

Settlement (Ward)	Candidate Site Ref	Site Name	Proposed Use	Site progressed past Stage 2	Site progressed past Stage 3A/3B	Site taken forward as a Deposit Allocation	Comments
Abergavenny (Mardy)	CS0185	Land to the west of Glebe Cottage,	Residential	✓	✗		Site not progressing via the RLDP process as insufficient information has been submitted in relation to the candidate site submission. Therefore, the site will not be allocated in the RLDP. It is noted however, that planning application DM/2018/00834 for a rural exceptions site for 12 affordable dwellings is pending consideration following the Welsh Government decision to not call in the application for determination by the Welsh Ministers.
Abergavenny (Lansdown)	CS0192	Land off Old Hereford Road	Residential	✓	✓	✗	The site is not allocated as there is sufficient and more suitable land available for residential development within Abergavenny to accommodate its housing need.
Abergavenny (Llanover)	CS0213	Land east of A465	Mixed Use: Residential (C3), Employment (B1), Retail (A1), Leisure, Education and Community Use (D1 and D2)	✓	✓	✓	It is proposed to allocate the site as Strategic Allocation. The allocation is a sustainably located edge of settlement site, located on the eastern edge of Abergavenny, that provides the longer-term intention for further growth beyond the Plan period. The site performs well against the site search sequence, with no significant constraints identified on site. The integration of the site with the existing settlement is a key principle with connection links forming a key policy requirement of the site's allocation. The site also meets key policy requirements including 50% affordable housing and net zero carbon homes demonstrating its viability and deliverability.
Abergavenny (Croesonen)	CS0220	Land at Ross Road	Residential	✓	✗		Site not progressing as insufficient information has been submitted in relation to viability to demonstrate the site is deliverable in accordance with key policy requirements. Significant concerns have also been raised in relation to highway and pedestrian access to the site and ecological impact given the SSSI and SINC designations relating to the site. Therefore, the site will not be allocated in the RLDP.
Abergavenny (Llanfoist Fawr)	CS0247	Coopers III (Land east of James Jones Close)	Residential	✓	✓	✗	The site is not allocated as there is sufficient and more suitable land available for residential development within the primary settlement of Abergavenny including Llanfoist to accommodate its housing need.
Abergavenny (Llanfoist Fawr)	CS0248	Land adjacent to Llanfoist Fawr	Residential	✓	✗		Site not progressing as fundamental highways concerns have been raised as there is no adopted highway access available. Concerns have also been raised in relation to landscape and ecological

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		Primary School (Whole Site)					impact. Overall, there are other sites in Abergavenny that are considered to be more suitable. Therefore, this site will not be allocated in the RLDP.
Abergavenny (Grofield)	CS0249	Land at Red Barn Farm (RBF2)	Residential	✓	✗		Site not progressing as insufficient information has been submitted in relation to viability to demonstrate the site is deliverable in accordance with key policy requirements. There are also landscape impact concerns associated with development of the site. Delivery of this site is dependent on the allocation of CS0164 – Red Barn Farm (1), which has been deemed unsuitable for allocation. Therefore, the site will not be allocated in the RLDP.
Abergavenny (Llanfoist Fawr)	CS0250	Land at Evesham Nurseries	Residential	✓	✓	✗	Site is not allocated as there is sufficient and more suitable land available for residential development within the primary settlement of Abergavenny including Llanfoist to accommodate its housing need.
Abergavenny (Llanover)	CS0262	Dobsons Farm	Employment (B1/B8)	✗			Site considered to be too divorced from the settlement and as a consequence would result in development in the open countryside. As such, the site is not suitable for development and has not progressed further in the candidate site assessment process.
Abergavenny (Llanfoist Fawr)	CS0263	Land adjacent to Llanfoist Fawr Primary School	Residential	✓	✗		Site not progressing as fundamental highways concerns have been raised as there is no adopted highway access available. Concerns have also been raised in relation to landscape and ecological impact. Overall, there are other sites that are considered to be more suitable in Abergavenny. Therefore, this site will not be allocated in the RLDP.
Abergavenny (Mardy)	CS0264	Land north of St Teilos	Residential	✓	✗		Site not progressing as significant concerns raised in relation to the heritage and ecological impact of developing the site. The central section of the site is also within a flood risk area. Therefore, the site will not be allocated in the RLDP.
Abergavenny (Mardy)	CS0265	Tredilion Park	Tourism/Leisure	✓	✗		While internal and external consultee comments were obtained on tourism sites, the proposed tourism policy approach in the Deposit Plan more appropriately allows for consideration of sustainable tourism related proposals, including beyond identified settlement boundaries. It is therefore not considered

Settlement (Ward)	Candidate Site Ref	Site Name	Proposed Use	Site progressed past Stage 2	Site progressed past Stage 3A/3B	Site taken forward as a Deposit Allocation	Comments
							appropriate/necessary to identify site specific tourism related allocations in the RLDP.
Abergavenny (Mardy)	CS0266	Land at Nantgavenny Business Park	Employment (B1/B2)	✓	✓	✓	The site forms a logical extension to the adjoining business park and would provide much needed employment land in Abergavenny. It is therefore proposed to allocate the site for B1/B2 employment use.
Abergavenny (Llanfoist Fawr)	CS0267	Waterloo Court	Residential	✓	✗		The small-scale nature of the site does not justify an allocation in the Plan. Further consideration will be given to the site as part of the settlement boundary review.
Abergavenny (Grofield)	CS0268	Westgate Gardens	Residential	✓	✗		The small-scale nature of the site does not justify an allocation in the Plan. Further consideration will be given to the site as part of the settlement boundary review.
Abergavenny (Llanfoist Fawr)	CS0269	Land at Grove Farm	Residential Care (C2)	✓	✗		Site not progressing as significant concerns have been raised in relation to highway and pedestrian access to the site and ecological and heritage impact. Therefore, the site will not be allocated in the RLDP.
Abergavenny (Llanfoist Fawr)	CS0284	Pen-Y-Worlod Stables	Residential	✓	✗		Site not progressing as it is does not provide a natural and logical extension to the settlement and does not relate physically, functionally or visually to the existing settlement pattern. Given the small numbers proposed, the site would result in a pocket development detached from the main settlement of Llanfoist. Furthermore, insufficient information has been submitted in order to conduct a full assessment of the site in relation ecology and highways. Therefore, the site will not be allocated in the RLDP.
Abergavenny (Grofield)	CS0286	The Abergavenny Workhouse (including residential)	Mixed use: Retail/Professional services/Food outlets (A1/A2/A3), Employment (B1/B2/B8), Health/leisure (D1/D2), Sui Generis and Residential (C3)	✓	✗		Site not progressing as while it performs well against the site search sequence criteria, insufficient information has been submitted to undertake a full assessment. Therefore, the site will not be allocated in the RLDP. However, given the site's location within the settlement boundary proposals can be pursued via the planning application system, subject to the detailed planning policies.

Settlement (Ward)	Candidate Site Ref	Site Name	Proposed Use	Site progressed past Stage 2	Site progressed past Stage 3A/3B	Site taken forward as a Deposit Allocation	Comments
Abergavenny (Llanover)	CS0293	Land east of A465 2	Mixed Use: Residential (C3), Employment (B1/B8), Retail/Commercial (A1/A3), Leisure, education and community use (D1/D2)	✓	✗	✗ (limited area allocated for placemaking purposes)	A small section of the Candidate Site at the northern end is allocated for placemaking purposes alongside CS0213 to form the strategic site allocation on land to the east of Abergavenny. Insufficient information has been submitted in relation to the wider site to undertake a full assessment and demonstrate deliverability in accordance with key policy requirements.
Primary Settlements: Chepstow							
Chepstow (Shirenewton)	CS0029	Barnetts Farm	Residential	✓	✗		Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements. This site is also considered to be of small scale and would have limited impact on achieving the required quantum of development in this area. Overall, there are considered to be more be more suitable sites available in Chepstow and therefore, this site will not be allocated in the RLDP.
Chepstow (St Arvans)	CS0054	Land west of Racecourse Roundabout	Residential	✓	✗		Site not progressing as insufficient information has been submitted in relation to demonstrating viability and deliverability in accordance with key policy requirements. Inclusion of the site of this scale would also have a negative impact on ecology due to loss of a locally protected SINC and nationally important Priority Habitats. Therefore, the site will not be allocated in the RLDP.
Chepstow (St Kingsmark/ Shirenewton)	CS0098	Land at Bayfield	Residential	✓	✓	✗	In October 2023 a report of post consultation Preferred Strategy changes was agreed by Council. This included amending the strategic site in Chepstow from Bayfield to Land at Mounton Road. On balance, it is considered that the benefits of the commercial development and associated job creation at the Mounton Road site outweighed the loss of higher quality agricultural land and encroachment into the existing green wedge separating Chepstow and Pwllmeyric, given the absence of alternative commercial sites and the importance of Chepstow for tourism as the gateway to the Wye Valley. It is considered that sufficient separation between Chepstow and Pwllmeyric would remain to prevent coalescence of the settlements. As such, it is considered that there is sufficient

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							and more suitable land available for residential development within the town to accommodate its housing need. Therefore, the site will not be allocated in the RLDP.
Chepstow (Shirenewton)	CS0112	Land at St Lawrence Lane	Residential	✓	✗		Site not progressing as insufficient information has been submitted in relation to demonstrating the viability and deliverability of the site. The site is within a Green Wedge and would also have negative ecology impact due to the ancient woodland priority habitat within the site. Therefore, the site will not be allocated in the RLDP.
Chepstow (Thornwell)	CS0154	Land to the north of M48	Hotel (C1)	✓	✗		While internal and external consultee comments were obtained on tourism sites, the proposed tourism policy approach in the Deposit Plan more appropriately allows for consideration of sustainable tourism related proposals, including beyond identified settlement boundaries. It is therefore not considered appropriate/necessary to identify site specific tourism related allocations in the RLDP.
Chepstow (St Kingsmark)	CS0165	Land at Mounton Road	Mixed Use: Residential (C3), Residential Care (C2), Hotel (D1)	✓	✓	✓	It is proposed to allocate the site as a Strategic Allocation in the Deposit Plan. The allocation is a sustainably located edge of settlement site that performs well against the site search sequence, with no significant constraints identified on site. The integration of the site with the existing settlement is a key principle with connection links forming a key policy requirement of the site's allocation. The site also meets key policy requirements, including 50% affordable housing and net zero carbon homes, demonstrating its viability and deliverability. The mixed-use development proposal, which includes a care home and hotel, is considered to have associated job creation and tourism benefits, with opportunities to work and live together and promote accessibility and connectivity to the existing settlement.
Chepstow (Thornwell)	CS0260	Land south of Junction 2 M48 (Option 1: Hotel and Employment)	Mixed Use: Hotel (C1), Employment (B1/B2/B8)	✓	✓	✗	A separate Candidate Site submission for Mixed Use: Petrol Station (Sui Generis), Drive Thru (A1/A3) and Employment (B1/B2/B8) has been submitted please see CS0261 for further details.
Chepstow (Thornwell)	CS0261	Land south of Junction 2 M48	Mixed Use: Petrol Station (Sui Generis),	✓	✓	✓	Site to progress to Deposit Plan as an employment site allocation. The Site has recently gained planning permission

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		(Option 2: Petrol Station, Drive Thru and Employment)	Drive Thru (A1/A3), Employment (B1/B2/B8)				(DM/2022/01155) for the non-B use suis generis use of a Petrol Station and Drive Thru facility. Overall, the remaining employment land at the site provides an opportunity for B use employment land within an already established and protected industrial site.
Primary Settlements: Monmouth							
Monmouth (Dixton with Osbaston)	CS0006	Land at Osbaston Road	Healthcare Centre (D1)	✓	✗		While internal and external consultee comments were obtained on this Candidate Site submission, it relates to a use more appropriately considered through the policy approach to community and recreation facilities adjoining identified settlement boundaries. It is therefore not considered appropriate/necessary to identify site specific community facility related allocations in the RLDP.
Monmouth (Drybridge)	CS0044	Land off Chartist Rise	Commercial (Class A/B1)	✗			Proposal is contrary to provisions set out in National Planning Policy in relation to Flooding. As such, the site is not suitable for development and has not progressed further in the candidate site assessment process.
Monmouth (Drybridge)	CS0045	Land off Cornpoppy Avenue	Commercial (Class A/B1)	✗			Proposal is contrary to provisions set out in National Planning Policy in relation to Flooding. As such, the site is not suitable for development and has not progressed further in the candidate site assessment process.
Monmouth (Drybridge)	CS0051	Land at Croft y Bwla Farm	Residential and Employment	✓	✗		Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements. Landscape impact and highway concerns have also been raised in relation to the site's allocation given the large scale of the site. Overall, there are considered to be more suitable sites available in Monmouth and therefore, this site will not be allocated in the RLDP.
Monmouth (Dixton with Osbaston)	CS0074	Land rear of The Royal Oak	Residential	✓	✗		The small-scale nature of the site does not justify an allocation in the Plan. Further consideration will be given to the site as part of the settlement boundary review.
Monmouth (Drybridge)	CS0076	Land west of Rockfield Road	Residential	✓	✓	✓	Part of this Candidate Site submission has extant planning permission for 70 dwellings. The remainder of the site sits neatly

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							within a gap between the permitted site to the east, residential development to the south and west and consequently has limited landscape impact. While the site is Best and Most Versatile agricultural Land, the principle of development in this location has been established through the permission of the adjacent site. The site benefits from good access to a range of services including a primary school, open space and neighbourhood centre. The site also meets key policy requirements, including 50% affordable housing and net zero carbon homes, demonstrating its viability and deliverability. It is therefore proposed to allocate the site for approximately 60 homes.
Monmouth (Drybridge)	CS0078	Land adjacent to Croft y Bwla Farm	Residential	✓	✓	✗	Site is not allocated as there is sufficient and more suitable land available for residential development within the primary settlement of Monmouth to accommodate its housing need.
Monmouth (Drybridge)	CS0099	Land at Drybridge Farm	Residential	✓	✗		Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements. Landscape impact and heritage concerns have also been raised in relation to the site's allocation. Therefore, this site will not be allocated in the RLDP.
Monmouth (Wyesham)	CS0131	Land off Justins Hill	Residential	✗			Viability Assessment not submitted to support proposal. The site was therefore not assessed as part of Stage 3A/3B and has not progressed further in the candidate site assessment process.
Monmouth (Drybridge)	CS0136	Land at former Poultry Units at Rockfield Road	Mixed Use: Residential(C3)/B1 and D1	✓	✗		Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability for residential uses in accordance with key policy requirements. The whole site is located in flood zone which would not be suitable for highly vulnerable development. Therefore, this site will not be allocated in the RLDP for mixed-use residential and employment use. A separate Candidate Site submission for employment use has been submitted – please see CS0272 for details.
Monmouth (Overmonnow)	CS0151	Former Troy Rail Yard	Residential	✓	✗		Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements. Approximately a third of the site is located in flood zone which would not be suitable for

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							highly vulnerable development. Therefore, this site will not be allocated in the RLDP.
Monmouth (Wyesham)	CS0189	Land at Tudor Road	Residential	✓	✓	✓	This site was allocated in the Adopted LDP, however, phosphates prevented its development in coming forward. In view of DCWW's planned improvements at the Monmouth Wastewater Treatment Works by 31st March 2025, a planning application has been submitted and is currently being considered. The site performs well against the site search sequence, with excellent links to a primary school, local shop/post office and open space. A significant proportion of the site is also identified as being non-BMV land (65%), which performs well in a Monmouthshire context. The site also meets key policy requirements, including 50% affordable housing and net zero carbon homes, demonstrating its viability and deliverability. It is therefore proposed to allocate the site for approximately 50 homes.
Monmouth (Dixton with Osbaston)	CS0216	Land at Hereford Road	Residential	✓	✓	✗	Site is not allocated as there is sufficient and more suitable land available for residential development within the primary settlement of Monmouth to accommodate its housing need.
Monmouth (Dixton with Osbaston)	CS0270	Leasbrook (Land north of Dixton Road)	Residential	✓	✓	✓	It is proposed to allocate the site as a Strategic Allocation for approximately 270 homes. The allocation is a sustainably located edge of settlement site, north of Dixton Road. The site performs well against the site search sequence, with excellent links to the comprehensive school, facilities in the town centre and surrounding infrastructure. The site offers the opportunity to create an exemplar residential and GI-led development in a gateway location on the entrance to Monmouth. The site also meets key policy requirements, including 50% affordable housing and net zero carbon homes, demonstrating its viability and deliverability.
Monmouth (Drybridge)	CS0271	Land at Vauxhall Fields	Mixed Use: Residential (C3), Residential Care (C2), Community Hub (A1/A3/D1)	✓	✓	✗	Site is not allocated as there is sufficient and more suitable land available for residential development within the primary settlement of Monmouth to accommodate its housing need.

Settlement (Ward)	Candidate Site Ref	Site Name	Proposed Use	Site progressed past Stage 2	Site progressed past Stage 3A/3B	Site taken forward as a Deposit Allocation	Comments
Monmouth (Drybridge)	CS0272	Land at former Poultry Units at Rockfield Road	Employment (B1 new build)	✓	✓	✓	While located in floodplain, this relates to a brownfield site with extant planning permission for B1 employment use, the proposed use would reflect the planning permission and therefore would not be contrary to TAN15. This site is therefore proposed to be allocated for B1 use in Policy EA1.
Monmouth (Wyesham)	CS0273	Rhossili, Hadnock Road	Residential	✓	✗		Site not progressing as significant concerns have been raised in relation to highway capacity and safety, along with ecological impact. Therefore, the site will not be allocated in the RLDP.
Monmouth (Drybridge)	CS0274	Land north of Wonastow Road	Mixed Use: Residential (C3), Employment (B1/B2/B8) and Community Use	✓	✓	✓ (part of the site for B1/B2/B8 only)	Site is not allocated for a mixed use residential and employment site as there is sufficient and more suitable land available for residential development within the primary settlement of Monmouth to accommodate its housing need. Part of the site is, however, considered appropriate for B1/B2/B8 employment uses as it forms a logical extension to adjoining employment uses and would provide much needed employment land in Monmouth. Part of CS0274 is therefore proposed to be allocated as a B1, B2 and B8 site in Policy EA1.
Monmouth (Drybridge)	CS0275	Land off Wonastow Road Industrial Estate	Employment (B1/B2/B8)	✓	✗		While located within defended flood zone, the site is greenfield and the proposal is therefore contrary to provisions set out in the latest National Planning Policy in relation to Flooding. Therefore, the site will not be allocated in the RLDP.
Monmouth (Dixton with Osbaston)	CS0276	Land at Dixton Roundabout	Retail	✗			Proposal is contrary to provisions set out in National Planning Policy in relation to Flooding. As such, the site is not suitable for development and has not progressed further in the candidate site assessment process.
Monmouth (Drybridge)	CS0277	Land at Drewen Farm	Residential	✓	✓	✓	This site was allocated in the Adopted LDP, however, phosphates prevented its development in coming forward. In view of DCWW's planned improvements at the Monmouth Wastewater Treatment Works by 31st March 2025 the site can now be progressed. The site performs well against the site search sequence, with good links to a primary school, neighbourhood centre, employment uses and open space. It is therefore proposed to allocate the site for approximately 110 homes.

Settlement (Ward)	Candidate Site Ref	Site Name	Proposed Use	Site progressed past Stage 2	Site progressed past Stage 3A/3B	Site taken forward as a Deposit Allocation	Comments
Monmouth (Drybridge)	CS0287	Land off Chartist Rise	Residential	✗			Proposal is contrary to provisions set out in National Planning Policy in relation to Flooding. As such, the site is not suitable for development and has not progressed further in the candidate site assessment process.
Monmouth (Drybridge)	CS0288	Land off Cornpoppy Avenue	Residential	✗			Proposal is contrary to provisions set out in National Planning Policy in relation to Flooding. As such, the site is not suitable for development and has not progressed further in the candidate site assessment process.
Monmouth (Dixton with Osbaston)	CS0289	Land at Dixton Roundabout	Employment	✗			Proposal is contrary to provisions set out in National Planning Policy in relation to Flooding. As such, the site is not suitable for development and has not progressed further in the candidate site assessment process.
Monmouth (Dixton with Osbaston)	CS0290	Land at Dixton Roundabout	Roadside facilities	✗			Proposal is contrary to provisions set out in National Planning Policy in relation to Flooding. As such, the site is not suitable for development and has not progressed further in the candidate site assessment process.
Monmouth (Wyesham)	CS0292	Rhossili, Hadnock Road	Employment and Hotel	✓	✗		Site not progressing as significant concerns have been raised in relation to highway capacity and safety, along with ecological impact. Therefore, the site will not be allocated in the RLDP.
Primary Settlements: Severnside - Caerwent							
Caerwent	CS0009	Land at Former MoD Training Centre	Mixed Use: Residential (C3), Care (C2), Employment (B1), Community Use (D1)	✓	✓	✓	It is proposed to allocate the site as mixed-use residential and employment (B1) allocation in the Deposit Plan. The allocation is a sustainably located edge of settlement site, which is previously developed land that performs well against the site search sequence, with no significant constraints identified on site that would prohibit its development. The site also meets key policy requirements, including 50% affordable housing and net zero carbon homes, demonstrating its viability and deliverability. The mixed-use development proposal which is allocated for 40 residential units and a minimum of 1ha of B1 employment land is considered to have associated job creation with opportunities to work and live together and promote accessibility and connectivity to the existing settlement of Caerwent and the wider Severnside Region. The site is not allocated for C2 (care home) /community

Settlement (Ward)	Candidate Site Ref	Site Name	Proposed Use	Site progressed past Stage 2	Site progressed past Stage 3A/3B	Site taken forward as a Deposit Allocation	Comments
							use (D1) as the need for these uses was not evidenced in this location.
Caerwent	CS0071	Land at Slough Farm	Residential	✓	✗		Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements. Ecology concerns have also been identified. Therefore, the site will not be allocated in the RLDP.
Primary Settlements: Severnside - Caldicot							
Caldicot (Severn)	CS0002	Land at the sewage works	Employment (B Use Classes)	✗			Proposal is contrary to provisions set out in National Planning Policy in relation to Flooding. As such, the site is not suitable for development and has not progressed further in the candidate site assessment process.
Caldicot (Severn)	CS0007	Land adjacent to Pill Row	Employment (B1, B2 and B8)	✗			Proposal is contrary to provisions set out in National Planning Policy in relation to Flooding. As such, the site is not suitable for development and has not progressed further in the candidate site assessment process.
Caldicot (Caldicot Castle)	CS0067	Land east and west of Church Road	Residential	✓	✓	✗	The site is considered to be of small scale and would have limited impact on achieving the required quantum of development in this area. Site is not allocated as there is sufficient and more suitable land available for residential development within the Severnside area to accommodate its housing need.
Caldicot (Caldicot Castle/Portskewett)	CS0087	The Showground	Residential	✓	✓	✓	It is proposed to allocate the site as part of a wider Strategic Allocation for approximately 770 homes. The allocation is a sustainably located edge of settlement site and will extend the settlement of Caldicot to the north-east, adjacent to the Crick Road, Portskewett site. The site performs well against the site search sequence, with good links to a shop, open space and employment uses with facilities in the town centre just over a 20 minute walk. These links will be strengthened via active travel links throughout the site. While the site has good links to a nearby primary school, a new primary school will be provided on the site to assist with capacity issues in the area and provide benefits to the wider community. The site is partly a brownfield site as it includes an existing commercial equestrian centre that is

Settlement (Ward)	Candidate Site Ref	Site Name	Proposed Use	Site progressed past Stage 2	Site progressed past Stage 3A/3B	Site taken forward as a Deposit Allocation	Comments
							relocating elsewhere. While the site is located in close proximity to heritage designations, no significant constraints are identified on the site. The site is also in close proximity to a SSSI. No built development will take place on these sensitive areas, with the area to the west of the former railway to be designated as an Area of Amenity Importance to provide additional protection. The site offers the opportunity to create an exemplar residential-led mixed-use development. The site also meets key policy requirements, including 50% affordable housing and net zero carbon homes, demonstrating its viability and deliverability.
Caldicot (Caerwent)	CS0129	Dewstow Village, Former Dewstow Golf Course	Residential	✓	✗		This site is considered too divorced from the settlement of Caldicot, as it is physically separated by the M48. Concerns have also been raised in relation to highways and landscape impact. There are considered to be more suitable sites available in this area and, therefore, the site will not be allocated in the RLDP.
Caldicot (West End/Rogiet)	CS0133	Land at Garthalan Drive	Employment (B Use Classes/Sui Generis)	✗			Proposal is contrary to provisions set out in National Planning Policy in relation to Flooding. As such, the site is not suitable for development and has not progressed further in the candidate site assessment process.
Primary Settlements: Severnside - Crick							
Crick (Caerwent)	CS0091	Caerwent Depot	Residential	✓	✗		Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability for residential uses in accordance with key policy requirements. Furthermore, the site is unable to connect to the public sewerage system and is located within a groundwater Source Protection Zone. As such, development in this location would as a consequence result in an unacceptable impact on the water environment. Therefore, the site will not be allocated in the RLDP.
Crick (Portskewett)	CS0251	Land at Bradbury Farm	Mixed Use: Residential (C3), Employment (B1/B2/B8), Retail (A1), Leisure (D1/Sui Generis)	✓	✓	✓ (site has been	It is proposed to allocate part of the site as part of a wider Strategic Allocation for approximately 770 homes. The allocation is a sustainably located edge of settlement site and will extend the settlement of Caldicot to the north-east, adjacent to the Crick Road, Portskewett site. The site performs well against the site search sequence, with good links to a shop, open space and

Settlement (Ward)	Candidate Site Ref	Site Name	Proposed Use	Site progressed past Stage 2	Site progressed past Stage 3A/3B	Site taken forward as a Deposit Allocation	Comments
						reduced in scale)	employment uses with facilities in the town centre just over a 20 minute walk. These links will be strengthened via the provision of active travel links throughout the site. While the site has good links to a nearby primary school, a new primary school will be provided on the site to assist with capacity issues in the area and provide benefits to the wider community. While the site is located in close proximity to heritage designations, no significant constraints are identified on the site. The site is also in close proximity to a SSSI. No built development will take place on these sensitive areas, with the area to the west of the former railway to be designated as an Area of Amenity Importance to provide additional protection. The site offers the opportunity to create an exemplar residential-led mixed-use development. The site also meets key policy requirements, including 50% affordable housing and net zero carbon homes, demonstrating its viability and deliverability. 6ha of the northern part of the originally submitted Candidate Site has been included as a separate B1, B2, B8 allocated employment site namely EA1e Land adjoining Oak Grove Farm, Caldicot. A gypsy and traveller site is included within the red line boundary of the originally submitted Candidate Site and has been assessed as part of a different process.
Primary Settlements: Severnside – Magor with Undy							
Magor (Mill)	CS0038	Land to the west of Wales One Business Park	Commercial (B1/B2/B8 uses)	✓	✓	✗	This site has now been constructed under planning application DM/2022/00634. The site is therefore allocated as a protected employment site under Policy (EA2S).
Magor (Mill)	CS0206	Land south of Newport Road	Residential and Residential Care Facility (C2)	✓	✓	✗	Site is not allocated as there is sufficient and more suitable land available for residential development within Severnside to accommodate its housing need.
Undy (The Elms)	CS0211	Land at Rockfield Farm	Residential	✓	✓	✗	Site is not allocated as there is sufficient and more suitable land available for residential development within Severnside to accommodate its housing need.

Settlement (Ward)	Candidate Site Ref	Site Name	Proposed Use	Site progressed past Stage 2	Site progressed past Stage 3A/3B	Site taken forward as a Deposit Allocation	Comments
Magor (Mill)	CS0227	Land at Bareland Street	Employment (B1/B8)	✗			Site not progressing as it is located within the Gwent Levels SSSI and there is no previous planning consent associated with the site, therefore there is evidence it will not deliver employment opportunities. There is no justification to continue with the current LDP employment allocation.
Magor (Mill)	CS0228	Land off Green Moor Lane	Employment (B1/B2/B8)	✓	✓	✓	Site to be allocated as an employment site in the Deposit Plan. The site is part of the southern section of CS0258 (Quay Point). No fundamental development constraints have been identified as part of the assessment process. Its allocation will provide much needed employment land in the Severnside region.
Magor (Mill)	CS0252	Gwent Europark	Employment (B1/B2/B8)	✓	✓	✓	Site to be allocated as an employment site in the Deposit Plan. The site is identified as an employment site in the current adopted LDP and has there is a history of planning consents granted on the site. The immediately adjacent land which lies within Newport Council Local Planning Authority and which forms part of the planning permission is currently being developed. Given its strategic location and evidence the site will come forward it is being reallocated in the RLDP.
Undy (The Elms)	CS0257	Land at Former Tythe House	Residential	✗			Proposal is contrary to provisions set out in National Planning Policy in relation to Flooding. As such, the site is not suitable for development and has not progressed further in the candidate site assessment process.
Magor (Mill)	CS0258	Quay Point (Land south of Magor Brewery)	Employment (B2/B8)	✓	✓	✓	Site to be allocated as an employment site in the Deposit Plan. No fundamental development constraints have been identified as part of the assessment process. Its allocation will provide much needed employment land in the Severnside region.
Primary Settlements: Severnside – Rogiet							
Rogiet	CS0134	Land at Chestnut Grove	Residential	✗			Proposal is contrary to provisions set out in National Planning Policy in relation to Flooding. As such, the site is not suitable for development and has not progressed further in the candidate site assessment process.
Rogiet	CS0168	Land adjacent to Merlin Close	Residential	✓	✗		Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in

Settlement (Ward)	Candidate Site Ref	Site Name	Proposed Use	Site progressed past Stage 2	Site progressed past Stage 3A/3B	Site taken forward as a Deposit Allocation	Comments
							accordance with key policy requirements. A significant proportion of the site is located in flood zone which would not be suitable for highly vulnerable development. The is also site within a green wedge designation where there is a presumption against new built development. Therefore, the site will not be allocated in the RLDP.
Rogiet	CS0253	Ifton Manor (Site A)	Mixed Use: Residential (C3), Employment (B1/B2/B8)	✓	✗		Site not progressing as it is designated as a green wedge in the RLDP where there is a presumption against new built development. and due to the scale of the proposal there are significant landscape concerns the proposal would have impacted on the openness of the green wedge land. The site also comprises 100% BMV land (38% of which relates to Grade 1 BMV). Overall, there are considered to be more suitable alternative sites in the Severnside area and, therefore, the site is not allocated in the RLDP.
Rogiet	CS0254	Ifton Manor (Site B)	Open Space, Green Infrastructure, Active Travel Links, Drainage associated with proposed residential and employment to the north (Site A)	✓	✗		The site has been promoted in association with the proposed residential/mixed-use development associated with CS0253 Ifton Manor Site A which has not progressed for the reasons set out above in response to CS0253. It is therefore not appropriate to allocate this use and the site is not allocated in the RLDP.
Rogiet	CS0255	Land adjacent to Ifton Industrial Estate	Employment (B2/B8)	✓	✗		The small-scale nature of the site does not justify an allocation in the Plan. Further consideration will be given to the site as part of the settlement boundary review.
Rogiet	CS0256	The Paddocks, Land adjacent to Rogiet Road	Residential	✓	✗		The small-scale nature of the site does not justify an allocation in the Plan. Further consideration will be given to the site as part of the settlement boundary review.
Secondary Settlements: Penperlleni							
Penperlleni (Goetre Fawr)	CS0037	Land South of Usk Road	Residential	✓	✓	✓	Overall, the site performs well against the assessment methodology with no fundamental constraints identified. The site also meets key policy requirements, including 50% affordable housing and net zero carbon homes, demonstrating its viability and deliverability. It is therefore proposed to allocate the site for

Settlement (Ward)	Candidate Site Ref	Site Name	Proposed Use	Site progressed past Stage 2	Site progressed past Stage 3A/3B	Site taken forward as a Deposit Allocation	Comments
							approximately 42 dwellings in Policy HA12 Land west of Trem yr Ysgol, Penperlleni.
Penperlleni (Goetre Fawr)	CS0138	Land at Goytre Farm	Residential	✓	✗		Site is not progressing to the Deposit Plan as there are landscape and ecological concerns particularly in relation to a significant proportion of the site being a designated Site of Importance for Nature Conservation (SINC). Overall, there are considered to be more suitable alternative sites in the area and, therefore, the site will not be allocated in the RLDP.
Penperlleni (Goetre Fawr)	CS0217	Land at Fairfield	Residential	✓	✗		Site is not progressing to the Deposit Plan as the site has a significant ecology constraint as the whole of the site is within a designated Site of Importance for Nature Conservation (SINC). Therefore, the site will not be allocated in the RLDP.
Penperlleni (Goetre Fawr)	CS0279	Land west of Usk Road	Residential	✓	✗		Site is not progressing to the Deposit Plan as there are significant landscape concerns in relation to developing west of the A4042 which would significantly change Penperlleni's settlement pattern and valued landscape. There are also concerns regarding connectivity to facilities in the settlement due to the location on the opposite side of the A4042. Overall, there are considered to be more suitable alternative sites in the area and, therefore, the site will not be allocated in the RLDP.
Penperlleni (Goetre Fawr)	CS0280	Land at Walnut Tree Farm	Residential	✓	✗		Site is not progressing to the Deposit Plan as the site has a significant highway constraint as it has not been able to demonstrate safe pedestrian access and connectivity from the site to the village centre of Penperlleni. Overall, there are considered to be more suitable alternative sites in the area and, therefore, the site will not be allocated in the RLDP.
Penperlleni (Goetre Fawr)	CS0291	Land east of Usk Road	Residential	✗			Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements. Therefore, the site will not be allocated in the RLDP.
Secondary Settlements: Raglan							

Settlement (Ward)	Candidate Site Ref	Site Name	Proposed Use	Site progressed past Stage 2	Site progressed past Stage 3A/3B	Site taken forward as a Deposit Allocation	Comments
Raglan	CS0069	Land at Raglan Enterprise Park	Employment (B1) and Renewable Energy (Solar)	✓	✓	✓	It proposed to allocate approximately 1.5ha of land adjoining the existing Protected Employment site as a new employment allocation, allowing for an extension to the existing Enterprise Park and supporting job growth in the Raglan and wider area. No fundamental constraints were identified as part of the assessment process. The allocation also provides an opportunity to develop an off-grid employment site linked to the proposed adjoining ground mounted solar array. It is also proposed to identify approximately 16ha of land to the west of the existing Raglan Enterprise Park as having potential for a ground mounted solar development, subject to detailed planning considerations. While the site is Grade 3a BMV land, it performs best in this respect when compared to the other solar related candidate site submissions. Allocation of the site provides an opportunity to contribute to local and national renewable energy targets.
Raglan	CS0183	Land south of Monmouth Road	Residential	✓	✓	✓	A reduced area to the candidate site submission is proposed for allocation in the RLDP. Overall, the site performs well against the site search sequence with good access to local amenities and no fundamental constraints have been identified. The site also meets key policy requirements, including 50% affordable housing and net zero carbon homes, demonstrating its viability and deliverability. It is therefore proposed to allocate the site for approximately 54 dwellings.
Raglan	CS0205	Land at Usk Road	Residential	✓	✓	✗	While a southern section of the site is within a flood risk area, development could be directed away from this part of the site. However, the site is not allocated as there is sufficient and more suitable land available for residential development within Raglan to accommodate its housing need.
Raglan	CS0278	Land west of Raglan	Employment	✓	✓	✓	A reduced area of approximately 4.5 ha (compared to the submitted 8ha) is proposed to be allocated for employment use in the RLDP, responding to site elevations and integrating the proposal more effectively into the landscape. No fundamental development constraints have been identified as part of the assessment process. Its allocation will provide much needed

Settlement (Ward)	Candidate Site Ref	Site Name	Proposed Use	Site progressed past Stage 2	Site progressed past Stage 3A/3B	Site taken forward as a Deposit Allocation	Comments
							employment land in Raglan and the wider County reflecting Raglan's location and its access links to other settlements.
Raglan	CS0281	Raglan Country Estate	Tourism/Leisure/ Commercial (A1/A3/C1/D1/D2/Sui Generis)	✓	✗		While internal and external consultee comments were obtained on tourism sites, the proposed tourism policy approach in the Deposit Plan more appropriately allows for consideration of sustainable tourism related proposals, including beyond identified settlement boundaries. It is therefore not considered appropriate/necessary to identify site specific tourism related allocations in the RLDP.
Secondary Settlements: Usk							
Usk	CS0039	Land at Little Castle Farm, Monmouth Road	Residential	✓	✗		Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements. Landscape and ecological concerns have also been raised particularly in relation to a significant proportion of the site being a designated Site of Importance for Nature Conservation (SINC) and due to the topography of the site and its elevated position it is likely to have a detrimental landscape impact. Overall, there are considered to be more suitable alternative sites in the area and, therefore, the site will not be allocated in the RLDP.
Usk (Llanbadoc)	CS0105	Land at Former Goods Yard	Residential	✓	✗		Site not progressing as insufficient information has been submitted in relation to viability to demonstrate the site is deliverable in accordance with key policy requirements. The site, which is within the settlement boundary of Usk is previously developed land, a protected employment site in the current LDP that has been vacant for some time. The site is wholly within flood zones 2 and 3, however is within a TAN15 defended zone. National Policy set out in TAN15 does allow for brownfield sites in defended zones to be considered acceptable providing they can meet flood risk criteria set out in the policy. The costs of flood risk mitigation also has had an impact of the viability and deliverability of the site.

Settlement (Ward)	Candidate Site Ref	Site Name	Proposed Use	Site progressed past Stage 2	Site progressed past Stage 3A/3B	Site taken forward as a Deposit Allocation	Comments
							There is also constraint in relation connection to public sewerage system, with the connection point at least 400m away from the site, again resulting in significant costs. A private sewerage treatment plant would not be appropriate for a development of this scale, particularly as the site is within a phosphate catchment zone of the River Usk Special Area of Conservation (SAC). Overall, it is not viable and deliverable to progress this site as an allocation. The site remains in the settlement boundary and as a consequence could progress for appropriate forms of development subject to detailed planning considerations.
Usk	CS0113	Burrium Gate (Phase II)	Residential	✓	✓	✓	The site performs well against the assessment methodology with no fundamental constraints identified. A landscape concern has been raised but it is considered that this cand be mitigated providing development is maintained within a ridgeline no more than 40m above Ordnance Datum (AOD). The site also meets key policy requirements, including 50% affordable housing and net zero carbon homes, demonstrating its viability and deliverability. It is therefore proposed to allocate the site for approximately 40 dwellings.
Usk	CS0282	Land north of Burrium Gate	Residential	✓	✗		Site not progressing to the Deposit Plan as there are landscape and ecological concerns, particularly in relation to a significant proportion of the site being a designated Site of Importance for Nature Conservation (SINC), and due to the topography of the site and its elevated position. Overall, there are considered to be more suitable alternative sites in the area and, therefore, the site will not be allocated in the RLDP.
Usk (Llanbadoc)	CS0285	Glen Yr Afon	Residential	✗			Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements. Therefore, the site will not be allocated in the RLDP.
Main Rural Settlements							
Devauden	CS0036	Land west of the B4293 and north of Devauden	Residential	✓	✓	✗	Site is not allocated as there is sufficient and more suitable land available for residential development within the primary settlement of Monmouth to accommodate its housing need.

Settlement (Ward)	Candidate Site Ref	Site Name	Proposed Use	Site progressed past Stage 2	Site progressed past Stage 3A/3B	Site taken forward as a Deposit Allocation	Comments
Devauden	CS0214	Land at Churchfields	Residential	✓	✓	✓	The site performs well against the assessment methodology with no fundamental constraints identified. The site also meets key policy requirements, including 50% affordable housing and net zero carbon homes, demonstrating its viability and deliverability. It is therefore proposed to allocate the site for approximately 20 dwellings.
Devauden	CS0236	Coal Lane Valley View	Residential	✗			No supporting information was submitted to evidence the deliverability of the proposed scheme of 3 market houses and gifting of remaining land for affordable housing. As such, the site has not progressed further in the candidate site assessment process. This site has been considered as part of the settlement boundary review.
Little Mill (Goetre Fawr)	CS0016	Land to the east of Little Mill	Residential and Commercial Hub (B1/B8)	✓	✓	✓	A reduced area to the candidate site submission is proposed for allocation in the RLDP. Overall, the site performs well against the site search sequence. The site also meets key policy requirements, including 50% affordable housing and net zero carbon homes, demonstrating its viability and deliverability. It is therefore proposed to allocate the site for approximately 20 dwellings. The commercial element of the candidate site submission for B1/B8 uses is not considered appropriate in this location and given the site's reduced size. More appropriate sites for B1/B8 uses are identified elsewhere in the County.
Little Mill (Goetre Fawr)	CS0075	Land to the north of Little Mill (Site B)	Residential	✓	✓	✓	This is an existing Adopted LDP allocation (SAH11(v)) and is reallocated in the RLDP as a 'Rollover' Allocation. A resolution to approve planning application DM/2020/01438 for 15 residential units was made by Planning Committee on 16th July 2024 and is awaiting the signing of the S106 Agreement. The site is therefore allocated in the RLDP.
Little Mill (Goetre Fawr)	CS0103	Land adjacent to Berthon Road	Residential	✓	✓	✗	The site is not allocated as there is sufficient and more suitable land available for residential development within Little Mill to accommodate its housing need.
Little Mill (Goetre Fawr)	CS0104	Land at Cae Melin	Residential	✓	✓	✗	The site is not allocated as there is sufficient and more suitable land available for residential development within Little Mill to accommodate its housing need.

Settlement (Ward)	Candidate Site Ref	Site Name	Proposed Use	Site progressed past Stage 2	Site progressed past Stage 3A/3B	Site taken forward as a Deposit Allocation	Comments
Little Mill (Goetre Fawr)	CS0233	Mulberry House, Berthon Road	Residential	✓	✗		The small-scale nature of the site does not justify an allocation in the plan. Further consideration will be given to the site as part of the settlement boundary review.
Little Mill (Goetre Fawr)	CS0241	Land to the north of Little Mill (Site A)	Residential	✓	✗		Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements. Therefore, this site will not be allocated in the RLDP.
Llandogo (Trellech United)	CS0101	Land adjacent to Parklands	Residential	✓	✗		Site is located within the existing development boundary which is proposed to be retained in this location. Given the site's location within the settlement boundary proposals can be pursued via the planning application system, subject to detailed planning policies.
Llandogo (Trellech United)	CS0124	The Reckless	Residential	✓	✗		Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements. Therefore, this site will not be allocated in the RLDP.
Llandogo (Trellech United)	CS0230	Land south of A466	Residential and Amenity Land	✓	✗		Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements. Therefore, this site will not be allocated in the RLDP.
Llandogo (Trellech United)	CS0245	Land at Parklands	Residential	✓	✗		Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements. Therefore, this site will not be allocated in the RLDP.
Llanellen (Llanfoist Fawr)	CS0027	Land adjacent to Llanellen Court Farm (North)	Residential	✓	✓	✓	A reduced area of 1.56ha to the candidate site submission is proposed for allocation in the RLDP to provide a more appropriate scale of development in a village context and to reflect the settlement's position in the hierarchy. Overall, the site performs well against the site search sequence and no fundamental constraints have been identified. The site also meets key policy requirements including 50% affordable housing and net zero carbon homes demonstrating its viability and deliverability. It is therefore proposed to allocate the site for approximately 26 dwellings.

Settlement (Ward)	Candidate Site Ref	Site Name	Proposed Use	Site progressed past Stage 2	Site progressed past Stage 3A/3B	Site taken forward as a Deposit Allocation	Comments
Llanellen (Llanfoist Fawr)	CS0028	Land adjacent to Llanellen Court Farm (South)	Residential	✗			Site is not considered compatible with the Preferred Strategy and is divorced from the settlement boundary. As such, the site is not suitable for development and has not progressed further in the candidate site assessment process.
Llanellen (Llanfoist Fawr)	CS0215	Land at Llanellen	Residential	✓	✗		Site not progressing as significant concerns have been raised in relation ecological impact. Therefore, the site will not be allocated in the RLDP.
Llanellen (Llanfoist Fawr)	CS0243	Land to the north of the Village Hall	Residential	✓	✗		Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements. Therefore, this site will not be allocated in the RLDP.
Llangybi (Llangybi Fawr)	CS0019	Land West of St. Cybi Drive	Residential	✓	✗		Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements. Therefore, this site will not be allocated in the RLDP.
Llangybi – (Llangybi Fawr)	CS0020	Land West of The Chase	Residential	✓	✗		Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements. Landscape concerns have also been identified. Therefore, this site will not be allocated in the RLDP.
Llangybi (Llangybi Fawr)	CS0242	Land north of New House	Residential	✓	✗		Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements. Landscape concerns have also been identified and Cadw raised concerns in relation to the impact of any development upon the nearby listed building and registered historic park and garden. Therefore, this site will not be allocated in the RLDP.
Llanover	CS0139	Land at Former Petrol Station	Employment (B1) (including farm shop A1)	✓	✗		The site is not progressing as an allocation due to heritage concerns regarding the impact on the Llanover Conservation Area, nearby Listed Buildings and the Llanover Historic Park and Garden. Therefore, this site will not be allocated in the RLDP.
Llanover	CS0140	Land south of Rhyd-y-Meirch	Residential	✓	✗		Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in

Settlement (Ward)	Candidate Site Ref	Site Name	Proposed Use	Site progressed past Stage 2	Site progressed past Stage 3A/3B	Site taken forward as a Deposit Allocation	Comments
							accordance with key policy requirements. Therefore, this site will not be allocated in the RLDP.
Llanvair Discoed (Caerwent)	CS0017	Land at Village Farm	Residential	✓	✗		Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements. The site also is not able to connect to the public sewerage system and is within a groundwater Source Protect Zone (SPZ), meaning that its development would result in an unacceptable impact on the water environment. Therefore, this site will not be allocated in the RLDP.
Mathern (Shirenewton)	CS0026	Land west of Baileys Hay	Residential	✓	✗		Site is not progressing as although the site meets key policy requirements including 50% affordable housing and net zero carbon homes, the proposed scale and size of the site is too large for a Main Rural Settlement. There are also concerns in relation to negative landscape impact associated with the proposed scale of the site within a wide open landscape, along with its close proximity to Mathern's Conservation Area. The site search sequence has identified that there are more suitable sites available for residential development within our Main Rural Settlements to accommodate identified housing need. Therefore, this site will not be allocated in the RLDP.
Mathern (Shirenewton)	CS0053	Land to the east of Cherry Trees	Residential	✓	✗		Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements. Therefore, this site will not be allocated in the RLDP.
Pwllmeyric (Shirenewton)	CS0030	Land off Chapel Lane	Residential	✓	✗		Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements. Therefore, this site will not be allocated in the RLDP.
Pwllmeyric (Shirenewton)	CS0229	Land opposite Chepstow Garden Centre	Tourism (Hotel) and Renewable Energy (Solar)	✓	✗		While internal and external consultee comments were obtained in relation to tourism sites, the proposed tourism policy approach in the Deposit Plan more appropriately allows for consideration of sustainable tourism related proposals, including beyond identified settlement boundaries. It is therefore not considered

Settlement (Ward)	Candidate Site Ref	Site Name	Proposed Use	Site progressed past Stage 2	Site progressed past Stage 3A/3B	Site taken forward as a Deposit Allocation	Comments
							appropriate/necessary to identify site specific tourism related allocations in the RLDP. The solar element is not being progressed as an allocation due to concerns raised in relation to the site's proximity to the Gwent Levels Historic Landscape. Ecology concerns have also raised in relation to the presence of a SINC on site, as well as flood risk issues on the eastern edge of the site. In addition, the site is predominantly Grade 2 BMV land, with the Minster for Climate Change letter of 1st March 2022 noting that significant weight should be given to protecting BMV land where solar arrays are proposed and the availability of more suitable alternatives.
Shirenewton	CS0111	Land adjacent to Thistledown Barn	Residential	✓	✗		Site not progressing as it is wholly Grade 2 Best and Most Versatile agricultural land and there are more suitable alternative sites with a lesser proportion of BMV land in Shirenewton. Therefore, the site will not be allocated in the RLDP.
Shirenewton	CS0208	Land west of Shirenewton Recreation Hall	Residential	✓	✗		Site not progressing as significant concerns have been raised in relation to heritage impact. Therefore, the site will not be allocated in the RLDP.
Shirenewton	CS0218	Land at Ditch Hill Lane (Option A)	Residential	✓	✗		Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements. Therefore, the site will not be allocated in the RLDP.
Shirenewton	CS0225	Land at Ditch Hill Lane (Option B)	Residential	✓	✗		Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements. Therefore, the site will not be allocated in the RLDP.
Shirenewton	CS0226	Land at Ditch Hill Lane (Option C)	Residential	✓	✗		Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements. Therefore, the site will not be allocated in the RLDP.
Shirenewton	CS0231	Land west of Shirenewton	Residential	✓	✗		Site not progressing as significant concerns have been raised in relation to heritage impact. Therefore, the site will not be allocated in the RLDP.

Settlement (Ward)	Candidate Site Ref	Site Name	Proposed Use	Site progressed past Stage 2	Site progressed past Stage 3A/3B	Site taken forward as a Deposit Allocation	Comments
		Recreation Hall (Smaller Site)					
Shirenewton	CS0232	Land to the west of Redd Landes	Residential	✓	✓	✓	A reduced area to the candidate site submission is proposed for allocation in the RLDP. Overall, the site performs well against the site search sequence. This site is located on the western edge of Shirenewton. While the site is partly Best and Most Versatile (BMV) agricultural land, it performs better in this respect compared to other Candidate Sites within the area as most have higher proportions of BMV agricultural land. The site benefits from excellent access to the recreation ground, play area and recreation hall due to its location opposite the site, and is also within walking distance of the primary school. The site meets key policy requirements, including 50% affordable housing and net zero carbon homes, demonstrating its viability and deliverability. It is therefore proposed to allocate the site for approximately 26 homes.
Shirenewton	CS0240	Land to the east of Mounton Court	Residential	✓	✗		Site not progressing as concerns have been raised in relation to highway impact. Therefore, the site will not be allocated in the RLDP.
Shirenewton	CS0244	Land to the west of Ditch Hill Lane	Residential	✓	✓	✗	Site is not allocated as there is sufficient and more suitable land available for residential development within the Main Rural Settlement of Shirenewton to accommodate its housing need.
St Arvans	CS0077	Land adjacent to Piercefield Public House	Residential	✓	✓	✓	The site performs well against the assessment methodology with no fundamental constraints identified. Although within the Wye Valley National Landscape (AONB), the proposal is small scale and the landscape assessment has demonstrated limited harm. The site also meets key policy requirements, including 50% affordable housing and net zero carbon homes, demonstrating its viability and deliverability. It is therefore proposed to allocate the site for approximately 16 homes.
St Arvans	CS0223	Land at New Barn Workshop	Tourism (Hotel)	✓	✗		While internal and external consultee comments were obtained on tourism sites, the proposed tourism policy approach in the Deposit Plan more appropriately allows for consideration of sustainable tourism related proposals, including beyond identified settlement boundaries. It is therefore not considered

Settlement (Ward)	Candidate Site Ref	Site Name	Proposed Use	Site progressed past Stage 2	Site progressed past Stage 3A/3B	Site taken forward as a Deposit Allocation	Comments
							appropriate/necessary to identify site specific tourism related allocations in the RLDP.
Trellech (Trellech United)	CS0092	Land at Monmouth Road	Residential	✓	✗		Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements. In addition, there is no capacity at the Trellech WwTW to accommodate foul flows from the site. Therefore, the site will not be allocated in the RLDP.
Trellech (Trellech United)	CS0234	Land east of De Clere Way	Residential	✓	✗		Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements. In addition, there is no capacity at the Trellech WwTW to accommodate foul flows from the site. Therefore, the site will not be allocated in the RLDP.
Werngifford/Pandy (Crucorney)	CS0219	Land at Sun Meadow	Residential	✓	✗		Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements. In addition, there is no capacity at the Pandy WwTW to accommodate foul flows from the site and there are concerns over flooding on the access to the site. Therefore, the site will not be allocated in the RLDP.
Minor Rural Settlements							
Grosmont (Crucorney)	CS0141	Land at Riverview	Residential	✗			Only minor residential infilling of 1 or 2 dwellings is considered acceptable in Minor Rural Settlements, subject to the detailed planning policy requirements. As such, the site has not progressed further in the candidate site assessment process.
Grosmont (Crucorney)	CS0246	Land west of Bevan Court	Residential and Community Hub (A1/A3/B1)	✗			Only minor residential infilling of 1 or 2 dwellings is considered acceptable in Minor Rural Settlements, subject to the detailed planning policy requirements. As such, the site has not progressed further in the candidate site assessment process.
Llandenny (Raglan)	CS0157	Land adjacent to Orchard Cottages	Residential	✗			Only minor residential infilling of 1 or 2 dwellings is considered acceptable in Minor Rural Settlements, subject to the detailed planning policy requirements. As such, the site has not progressed further in the candidate site assessment process.

Settlement (Ward)	Candidate Site Ref	Site Name	Proposed Use	Site progressed past Stage 2	Site progressed past Stage 3A/3B	Site taken forward as a Deposit Allocation	Comments
Llandewi Rhydderch (Llanover)	CS0207	Land west of Llandewi Rhydderch	Residential	✘			Only minor residential infilling of 1 or 2 dwellings is considered acceptable in Minor Rural Settlements, subject to the detailed planning policy requirements. As such, the site has not progressed further in the candidate site assessment process.
Llanishen (Trellech United)	CS0221	Land at Penarth Farm	Residential	✘			Llanishen is located within Tier 4 Minor Rural Settlement. Only minor infilling considered acceptable, subject to the detailed planning policy requirements.
Llanishen (Trellech United)	CS0222	Land at Penarth Farm, Llanishen	Renewable Energy (Solar)	✘			The site is not being progressed as an allocation due to its location in the Wye Valley National Landscape (AONB) and PPW's policy position that the AONB designation should be afforded the highest protection. In addition, 67% of the site relates to Best and Most Versatile agricultural land, with the Minster for Climate Change letter of 1st March 2022 noting that significant weight should be given to protecting BMV land where solar arrays are proposed and the availability of more suitable alternatives.
Penallt (Trellech United)	CS0047	Land at Penallt	Residential	✘			Penallt is located within Tier 4 Minor Rural Settlements. Only minor infilling considered acceptable, subject to the detailed policy requirements of the RLDP.
Open Countryside							
Llanbadoc	CS0210	Land at Llanbadoc	Residential	✘			Site is contrary to provisions set out in National Planning Policy in relation to flooding. Site is not considered compatible with the Preferred Strategy due to its location in the open countryside. As such, the site is not suitable for development and has not progressed further in the candidate site assessment process.
Llanbadoc	CS0237	Land at Llanbadoc, north of Usk Garden Centre	Employment (B1/B8)	✘			Site is not considered compatible with the Preferred Strategy due to its location in the open countryside. As such, the site is not suitable for development and has not progressed further in the candidate site assessment process.
Llanbadoc	CS0238	Land at Prioress Mill Lane	Employment (B1/B8)	✘			Site is not considered compatible with the Preferred Strategy due to its location in the open countryside. As such, the site is not suitable for development and has not progressed further in the candidate site assessment process.

Settlement (Ward)	Candidate Site Ref	Site Name	Proposed Use	Site progressed past Stage 2	Site progressed past Stage 3A/3B	Site taken forward as a Deposit Allocation	Comments
Llanbadoc	CS0239	Land at Prioress Mill Lane	Mixed Use: Residential (C3) and Employment (B1/B8)	✗			Site is not considered compatible with the Preferred Strategy due to its location in the open countryside. As such, the site is not suitable for development and has not progressed further in the candidate site assessment process.
Near Llangwm (Devauden)	CS0283	Rockfield Farm	Tourism	✗			Site is not considered compatible with the Preferred Strategy due to its location in the open countryside. As such, the site is not suitable for development and has not progressed further in the candidate site assessment process.
Manson (Dixton with Osbaston)	CS0088	Land adjacent to Fairview, Manson	Residential	✗			Site is not considered compatible with the Preferred Strategy due to its location in the open countryside. As such, the site is not suitable for development and has not progressed further in the candidate site assessment process.
Near Portskewett (Portskewett/ Sudbrook)	CS0066	Bridge View Farm	Renewable Energy (Solar)	✓	✗		The site is not being progressed as an allocation due to concerns raised in relation to the site's location on the Gwent Levels. In addition, the site is wholly Grade 2 BMV land, with the Minster for Climate Change letter of 1st March 2022 noting that significant weight should be given to protecting BMV land where solar arrays are proposed and the availability of more suitable alternatives. Therefore, the site will not be allocated in the RLDP.
Near Portskewett (Portskewett)	CS0259	Bridge View Farm	Tourism	✓	✗		While internal and external consultee comments were obtained on tourism sites, the proposed tourism policy approach in the Deposit Plan more appropriately allows for consideration of sustainable tourism related proposals, including beyond identified settlement boundaries. It is therefore not considered appropriate/necessary to identify site specific tourism related allocations in the RLDP.
Near St. Arvans (St. Arvans)	CS0003	Livox Quarry	Tourism/Leisure	✓	✗		While internal and external consultee comments were obtained on tourism sites, the proposed tourism policy approach in the Deposit Plan more appropriately allows for consideration of sustainable tourism related proposals, including beyond identified settlement boundaries. It is therefore not considered appropriate/necessary to identify site specific tourism related allocations in the RLDP.

Settlement (Ward)	Candidate Site Ref	Site Name	Proposed Use	Site progressed past Stage 2	Site progressed past Stage 3A/3B	Site taken forward as a Deposit Allocation	Comments
North of Magor (Mill, The Elms, Rogiet, Caerwent)	CS0198	St Brides New Settlement (Land north of Junction 23, Magor)	New Settlement	✘			Site is not considered compatible with the Preferred Strategy or national planning policy which states new settlements should be proposed via a Joint LDP, SDP or Future Wales. As such, the site has not progressed further in the candidate site assessment process.
North of Raglan (Raglan, Llanover, Mitchel Troy)	CS0224	Cwm Pentref New Community	New Settlement	✘			Site is not considered compatible with the Preferred Strategy or national planning policy which states new settlements should be proposed via a Joint LDP, SDP or Future Wales. As such, the site has not progressed further in the candidate site assessment process.

Candidate Sites for Protection

Settlement (Ward)	Candidate Site Ref	Site Name	Proposed Use	Comments
Primary Settlements: Abergavenny				
Abergavenny (Croesonen/Mardy)	CSP001	Gavenny Valley	DES2 – Area of Amenity Importance	The site has been considered as part of the review of Areas of Amenity Importance which concludes that apart from Croesonen Parc, which will be designated separately, the site is mostly private, inaccessible and considered to be Open Countryside. It is therefore not suitable for designation as an Area of Amenity Importance.
Abergavenny (Cantref/Grofield)	CSP002	Western Abergavenny	Protection as buffer to BBNP	The site is located outside the settlement boundary and is therefore considered to have sufficient protection as any proposals would be assessed against national and local policy requirements relating to open countryside locations. The candidate site has also been assessed as part of the Green Wedge Assessment and in accordance with the review's findings, the relevant sections of the site have been designated as green wedge.
Abergavenny (Cantref)	CSP003	Land at Pentre Road	Protection as buffer to BBNP	The site is located outside the settlement boundary and is therefore considered to have sufficient protection as any proposals would be assessed against national and local policy requirements relating to open countryside locations. The candidate site has also been assessed as part of the Green Wedge Assessment and consistent with its findings the site is designated as a Green Wedge in the RLDP.
Abergavenny (Croesonen / Lansdown / Mardy)	CSP004	Land north of Abergavenny	Protection as buffer to BBNP	The site has been assessed as part of the Green Wedge Assessment and consistent with its recommendations the northern slither of land, adjoining the BBNP boundary, has been designated as a Green Wedge due to its function in relation to the protection of Abergavenny's setting with the BBNP. However, the Green Wedge Assessment also concludes that the southern section of the site has a moderate buffer role and therefore a green wedge designation is not considered appropriate. Consistent with national guidance, which allows for green wedge and settlement boundaries to make provision for a sufficient range of development land which is suitably located in relation to the existing urban edge should be made available, having regard to the longer-term need for development land, the effects of development pressures in areas beyond the green wedge and the need to minimise demand for travel, Land at Penlanlas (CS094), is allocated for residential purposes.
Primary Settlements: Chepstow				
Chepstow (Mount Pleasant / Shirenewton St Kingsmark)	CSP017	Land at Bayfield	Protection from development	The site is located outside the settlement boundary and is therefore considered to have sufficient protection as any proposals would be assessed against national and local policy requirements relating to open countryside locations. A site-specific protection designation is therefore not considered necessary in addition to the policy protection proposed in the Plan.
Primary Settlements: Monmouth				

Monmouth (Overmonnow)	CSP005	Triwall Factory Old Playing Field	DES2 – Area of Amenity Importance	The site has been considered as part of the review of Areas of Amenity Importance which concludes that this area is private and inaccessible and, therefore, is not suitable for designation as an Area of Amenity Importance.
Monmouth (Osbaston)	CSP007	Land at Old Hereford Road	Protection from development	The site is located outside the settlement boundary and is therefore considered to have sufficient protection as any proposals would be assessed against national and local policy requirements relating to open countryside locations. A site-specific protection designation is therefore not considered necessary in addition to the policy protection proposed in the Plan.
Monmouth (Wyesham)	CSP008	Claypatch Woods	Natural flood management	The site is proposed to be allocated as an Area of Amenity Importance within the RLDP, which protects the land from development. Natural flood management proposals such as additional tree planting to enhance the site's flood management role can be considered outside of the RLDP or within its policy framework where planning permission is required and, therefore, do not require a specific designation in the Plan. The Council is currently preparing an update to the Local Flood Strategy with a consultation exercise anticipated towards the end of 2024 or early 2025.
Monmouth (Osbaston)	CSP009	Land adjacent Orchard Cottage	Natural flood management	Natural flood management proposals such as additional tree planting to enhance the site's flood management role can be considered outside of the RLDP or within its policy framework where planning permission is required and, therefore, do not require a specific designation in the Plan. The Council is currently preparing an update to the Local Flood Strategy with a consultation exercise anticipated towards the end of 2024 or early 2025.
Monmouth (Wyesham)	CSP010	Wyesham	Retrofit of SUDs measures	The introduction of sustainable drainage measures within Wyesham can be considered within the RLDP's policy framework where planning permission is required and, therefore, does not require a specific designation in the Plan. The Council is currently preparing an update to the Local Flood Strategy with a consultation exercise anticipated towards the end of 2024 or early 2025.
Monmouth (Osbaston)	CSP011	Osbaston	Retrofit of SUDs measures	The introduction of sustainable drainage measures within Wyesham can be considered within the RLDP's policy framework where planning permission is required and, therefore, does not require a specific designation in the Plan. The Council is currently preparing an update to the Local Flood Strategy with a consultation exercise anticipated towards the end of 2024 or early next 2025.
Monmouth (Wyesham)	CSP012	Land adjacent Wyesham Lane	Natural flood management	Natural flood management proposals such as additional tree planting to enhance the site's flood management role can be considered outside of the RLDP or within its policy framework where planning permission is required and, therefore, do not require a specific designation in the Plan. The Council is currently preparing an update to the Local Flood Strategy with a consultation exercise anticipated towards the end of 2024 or early 2025.
Monmouth (Drybridge)	CSP013	Land east Kingswood	Natural flood management	Natural flood management proposals within the candidate site boundary such as additional tree planting to enhance the site's flood management role can be considered outside of the RLDP or within its policy framework where planning permission is required and, therefore, do not require a specific designation in the Plan. The Council is currently preparing an update to the Local Flood Strategy with a consultation exercise anticipated towards the end of 2024 or early 2025.

Monmouth (Osbaston)	CSP016	Hereford Road	Protection from development	The site is located outside the settlement boundary and is therefore considered to have sufficient protection as any proposals would be assessed against national and local policy requirements relating to open countryside locations. A site-specific protection designation is therefore not considered necessary in addition to the policy protection proposed in the Plan.
Monmouth (Town)	CSP018	Land at Monmouth Comprehensive School	Open space	The site has been considered as part of the review of Areas of Amenity Importance which concludes that the area should not be designated as an Area of Amenity Importance but can contribute to Open Space provision. Accordingly, this site is identified on the Proposals Map as Open Space.
Monmouth (Drybridge)	CSP019	Land west of Kingswood Gate	Natural flood management	Natural flood management proposals such as additional tree planting to enhance the site's flood management role can be considered outside of the RLDP or within its policy framework where planning permission is required and, therefore, do not require a specific designation in the Plan. The Council is currently preparing an update to the Local Flood Strategy with a consultation exercise anticipated towards the end of 2024 or early 2025.
Monmouth (Drybridge)	CSP020	Land at Cornpoppy Avenue	Open space	The site has been considered as part of the review of Areas of Amenity Importance which concludes that both areas are private and inaccessible so cannot be designated as an Area of Amenity Importance but can contribute to Open Space provision. Accordingly, this site is identified on the Proposals Map as Open Space.
Primary Settlements: Severnside				
Magor with Undy (Magor West / Magor East)	CSP021	Land north and west of Magor	Protection from development	The site is located outside the settlement boundary and is therefore considered to have sufficient protection as any proposals would be assessed against national and local policy requirements relating to open countryside locations. The northern section of the site has also been considered as part of the review of Areas of Amenity Importance as it was submitted for this purpose under Candidate Site submission CSP022. This review concludes that the northern area has no formal amenity value and being located outside of the development boundary, is considered to be open countryside. The area is therefore not suitable for designation as an Area of Amenity Importance. A site-specific protection allocation is therefore not considered necessary.
Magor with Undy (Magor West / Magor East)	CSP022	Land to the north of Magor	DES2 – Area of Amenity Importance	The site has been considered as part of the review of Areas of Amenity Importance which concludes that the area has no formal amenity value and being located outside of the development boundary and is therefore considered to be open countryside. The area is therefore not suitable for designation as an Area of Amenity Importance.
Rural General				
Coed-y-paen (Llangybi Fawr)	CSP006	Land adjacent Garden Cottage	DES2 – Area of Amenity Importance	The site has been considered as part of the review of Areas of Amenity Importance which concludes that this area is inaccessible and therefore is not suitable for designation as an Area of Amenity Importance.
Crick (Caerwent / Shirenewton)	CSP014	Runston Village Conservation Area	Protection from development	The site is located outside the settlement boundary and is therefore considered to have sufficient protection as any proposals would be assessed against national and local policy requirements relating to open countryside locations. A site-specific protection designation is therefore not considered necessary in addition to the policy protection proposed in the Plan.

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Mathern / Portskewett (Portskewett / Shirenewton)	CSP015	St Pierre Conservation Area	Protection from development	The site is located outside the settlement boundary and is therefore considered to have sufficient protection as any proposals would be assessed against national and local policy requirements relating to open countryside locations. A site-specific protection allocation is therefore not considered necessary in addition to the policy protection proposed in the Plan.

Appendix 1 – Sites not resubmitted in the Second Call for Candidate Sites

Sites not resubmitted in the Second Call for Candidate Sites				
CS Reference	**Site Name**	**Settlement**	**Site Area (Ha)**	**Proposed Use**
CS0035	Land at Brecon Road	Abergavenny	0.42	Residential
CS0145	Land adjacent Raglan Terrace	Abergavenny	0.71	Business - Use Class B2
CS0147	Land north of Hillside	Abergavenny	0.9	Residential
CS0172	Maindiff Court Hospital	Abergavenny	6.4	Technology/Education
CS0197	Land at King Henry VIII School	Abergavenny	3.6	Residential
CS0200	Land off Old Hereford Road	Abergavenny	1.37	Community supported agriculture
CS0201	Land off Old Hereford Road	Abergavenny	2.54	'One Planet' dwelling community
CS0202	Land off Old Hereford Road	Abergavenny	1.04	'Land Share' growing project
CS0203	Maindiff Court	Abergavenny	7.54	Business units, conference & management facilities
CS0204	Land between Brecon Road & A465	Abergavenny, Llanfoist	14.85	By-pass
CS0062	Land opposite Eastgate Crescent	Caerwent	4.41	Residential
CS0126	Caerwent Brook	Caerwent	6.4	Residential
CS0166	Caerwent A	Caerwent	8.9	Residential
CS0167	Caerwent B	Caerwent	3.01	Residential
CS0194	Land at Five Lanes Farm	Caerwent	1.68	Residential
CS0086	Land adjacent Church Road	Caldicot	0.63	Residential
CS0127	Land at Church Farm	Caldicot	10.09	Residential

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Sites not resubmitted in the Second Call for Candidate Sites				
CS Reference	**Site Name**	**Settlement**	**Site Area (Ha)**	**Proposed Use**
CS0008	Chepstow Racecourse	Chepstow	97	Racecourse/leisure/tourism/residential
CS0055	Piercefield Avenue	Chepstow	0.56	Residential
CS0152	Land at Wyelands	Chepstow	100	Housing and/or logistics
CS0022	Former Garage Site	Cross Ash	0.3	Residential
CS0110	BAE Systems	Glascoed	358	Protected Employment Site
CS0059	Land adjacent Poorscript Gardens	Grosmont	0.5	Residential
CS0034	Land off Cae Melin Road	Little Mill	6.24	Residential
CS0025	Land off Nantsor Road	Llandegveth	0.87	Residential
CS0073	Land north St John's Church	Llandenny	0.35	Residential
CS0156	Plot A	Llandenny	0.52	Residential
CS0011	Land at Sycamore	Llandevenny	5.491	Employment
CS0050	Land at Heol Gerrig	Llanellen	0.83	Residential
CS0052	Land adjacent Llanellen	Llanellen	2.27	Residential
CS0187	Westgate	Llanfoist	2.34	Mixed use including residential
CS0199	Land at Llanfoist	Llanfoist	10.6	'One Planet' dwelling community
CS0021	Land South West of The Rectory	Llangybi	1	Residential
CS0132	Land adjacent Vine Tree	Llangybi	0.22	Residential
CS0158	Land at Ton Road	Llangybi	0.4	Residential
CS0159	Land at Tregrug Farm	Llangybi	0.28	Residential

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Sites not resubmitted in the Second Call for Candidate Sites				
CS Reference	**Site Name**	**Settlement**	**Site Area (Ha)**	**Proposed Use**
CS0013	Land fronting B4293	Llanishen	1.809	Residential
CS0031	Land at Llanishen	Llanishen	0.9	Residential
CS0072	Land west Court Farm	Llantilio Crossenny	1.06	Residential
CS0095	Land adjacent Church Farm - Plot A	Llantrisant	0.82	Residential
CS0096	Land adjacent Church Farm - Plot B	Llantrisant	2.3	Residential
CS0097	Land adjacent Church Farm - Plot C	Llantrisant	0.6	Residential
CS0048	Land adjacent Mathern Day Nursery	Mathern	0.25	Residential
CS0049	Leg of Mutton Field	Mathern	0.41	Residential
CS0142	Field adjacent to Moynes Court	Mathern	0.8	Residential
CS0143	Land east Green Acres	Mitchel Troy	0.71	Residential
CS0057	East Wales Nursery	Monkswood	0.97	Residential
CS0005	Dixton Road	Monmouth	3.33	Healthcare Services
CS0162	Land north Redbrook Road	Monmouth	1.4	Residential
CS0173	Mayhill House	Monmouth	0.2	Residential
CS0188	Wheatfield Paddocks	Monmouth	0.4	Residential
CS0195	Land at Old Hereford Road	Monmouth	6.7	Residential
CS0171	Stone House Farm	Newcastle	2	Residential
CS0137	Land at Croes Faen	Penallt	0.49	Residential
CS0063	Mount Ballan Settlement	Portskewett & Crick	370.21	New settlement

Sites not resubmitted in the Second Call for Candidate Sites				
CS Reference	**Site Name**	**Settlement**	**Site Area (Ha)**	**Proposed Use**
CS0107	Land adjoining Mathern Road	Pwllmeyric	1.1	Residential
CS0116	Land adjacent Chepstow Garden Centre	Pwllmeyric	0.59	Residential
CS0118	Hill Farm Cottage	Pwllmeyric	3.2	Residential
CS0119	Land adjacent Chepstow garden Centre	Pwllmeyric	1.6	Residential
CS0015	Land off Monmouth Road	Raglan	0.98	Residential
CS0079	Land south east of Raglan	Raglan	29.55	Residential/commercial/leisure
CS0080	Land adjacent Station Road	Raglan	0.73	Residential
CS0081	Land south Monmouth Road	Raglan	3.81	Residential
CS0181	Raglan Wyevale Garden Centre	Raglan	3.1	Residential or employment
CS0032	Land north B4233 adjacent Rockfield Village	Rockfield	0.98	Residential
CS0150	Land east of Rogiet	Rogiet	35.2	Residential
CS0169	Land north B4245	Rogiet	0.88	Residential
CS0170	Land north B4245	Rogiet	0.76	Residential
CS0102	Gaerllwyd Farm	Shirenewton	3.72	Residential
CS0177	Land north Crick Road	Shirenewton	1.95	Residential
CS0191	Land east Shirenewton	Shirenewton	0.17	Residential
CS0155	Land to the east The Bell Inn	Skenfrith	0.5	Residential
CS0004	Livox Quarry	St Arvans	16.485	Tourism and accommodation venue
CS0010	Former Fordwich Nurseries	St Arvans	1.2	Residential

Sites not resubmitted in the Second Call for Candidate Sites				
CS Reference	**Site Name**	**Settlement**	**Site Area (Ha)**	**Proposed Use**
CS0120	Land at Carrow Hill Farm	St Brides Netherwent	2.03	Residential
CS0121	Land off St Brides Road	St Brides Netherwent	3.85	Residential
CS0193	Land at Carrow Hill Farm	St Brides Netherwent	15.5	Residential
CS0014	Former Sudbrook Paper Mill (Phase ll)	Sudbrook	3.3	Residential
CS0082	The Boatyard	The Narth	0.61	Residential
CS0024	Land off St Andrews Walk	Tredunnock	1.35	Residential
CS0083	Land off Church Street	Trellech	0.55	Residential
CS0109	Curtilage of Churchwood House	Trellech	0.25	Residential
CS0122	Land at Three Stones	Trellech	1.26	Residential
CS0123	Land at Tinkers Lane	Trellech	0.64	Residential
CS0042	Land at Courtfield	Undy	1.47	Residential
CS0046	Land at Great House Farm	Undy	6.8	Residential
CS0068	Knollbury	Undy	29.22	Residential/Employment
CS0070	Pennyfarthing Lane	Undy	0.92	Residential
CS0117	Land adjacent Patchway	Undy	0.36	Residential or commercial
CS0060	Land at Werngifford	Werngifford	2.8	Residential
CS0058	Lady Grove	Wonastow	15.02	Recreation/Tourism

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Replacement Local Development Plan

2018-2033

RLDP Background Paper:

Self-Assessment of the Deposit Plan against the Tests of Soundness

monmouthshire
sir fynwy

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Self-Assessment of the Deposit Plan against the Tests of Soundness

1. Introduction

1.1. This paper is one of a series produced by Monmouthshire County Council (MCC) as part of the evidence base for the Replacement Local Development Plan (RLDP) which covers the period 2018 – 2033. As part of the development plan process the Council needs to demonstrate that the Plan is 'sound'. The purpose of this paper is to assess the Deposit Plan against the tests of soundness set out in the Development Plans Manual (Edition 2 – March 2020).

1.2. The self-assessment undertaken is considered to demonstrate that the Deposit Plan and the processes followed to reach this stage are 'sound'.

1.3. The soundness of the RLDP will continue to be assessed against the tests of soundness as the Plan progresses to an independent Examination by a Planning Inspector.

1.4. The Council's self-assessment of the Deposit Plan is set out below.

2. Self-assessment of the Deposit Plan against the Tests of Soundness

Test of Soundness Development Plans Manual – Ed 3, March 2020	Response This self-assessment has been undertaken to monitor consistency with the Tests of Soundness at the Deposit stage of the Replacement Local Development Plan process.
Preparation Requirements: • Has preparation of the plan complied with legal and regulatory procedural requirements? (LDP Regulations, CIS, SEA Regulations, SA, HRA etc.?) • Is the plan in general conformity with the NDF (now referred to as Future Wales: The National Plan 2040) and/or SDP? (when published or adopted respectively)	The Deposit Plan has been prepared in accordance with the procedural requirements. Notable reference should be had to the publication of the Integrated Sustainability Appraisal (ISA) (2024) and the Habitats Regulations Assessment (HRA) Report (2024) which have been published as supporting documents to the Deposit Plan. These build on the work undertaken to accompany earlier stages of the Replacement Local Development Plan (RLDP) process – Integrated Sustainability Appraisal Scoping Report (December 2018), Initial Integrated Sustainability Appraisal (ISA) for the Monmouthshire RLDP (Nov 2022) and Initial Habitats Regulations Assessment Screening Report (December 2018) and Habitats Regulations Assessment of the Monmouthshire RLDP Preferred Strategy (Nov 2022). Scheduled consultation arrangements and documents are in accordance with the LDP Regulations (2005 as amended 2015). The scope and method of consultation is consistent with the Community Involvement Scheme, which includes engagement with a range of stakeholders including the public, elected members, developers and statutory consultees. Many of the consultation measures put in place during the Covid-19 pandemic have been retained to add to the methods of engagement. These provide communities and stakeholders the ability to engage with the RLDP consultation in a virtual manner through webinars and are scheduled alongside face to face 'drop-in' sessions. Full details of the consultation arrangements will be available on the Council's website. Prior to the consultation on the Deposit Plan, significant non-statutory consultation has also been undertaken to gain an understanding of the issues and options relevant to the County, with a couple of stages revisited and reviewed due to updated evidence, the Covid-19 pandemic and consideration

	of comments received during consultation exercises. A summary of key RLDP stages undertaken is set out in Appendix 2 of the Deposit Plan. Full details of the consultation methods undertaken are set out in the Initial Consultation Report which accompanies the Deposit Plan. Welsh Government published Future Wales: The National Plan 2040 in February 2021. This establishes the national development framework, setting the direction for development in Wales to 2040 and provides the policy framework for SDPs and LDPs, with a requirement for the lower tier plans to be in general conformity with Future Wales. In response to the Preferred Strategy (Dec 2022), consultation Welsh Government formally responded with a 'green' rating and noting that *"Future Wales places great emphasis on the development of National Growth Areas and the need for additional affordable housing. The Preferred Strategy is in general conformity with Policies 1, 7 and 33 of Future Wales and does not undermine the role of Cardiff, Newport and the Valleys as the main focus for growth and investment in the south east region, but reflects the urgent need to increase the supply of affordable housing in Monmouthshire."* In this respect the overarching strategy of the Deposit Plan has been accepted as being in conformity with Future Wales by Welsh Government. The proposed level of growth set out in the Deposit Plan is essential to deliver on our local evidence-based issues and objectives and to ensure the RLDP is 'sound'. It is supported by policies 3, 4, 5 and 7 of FW, which support public leadership and the use of public land to deliver on ambitious affordable housing targets, demographically balanced rural communities, the rural economy and the delivery of affordable homes. The growth strategy will assist in addressing our core issues without harming or compromising Welsh Government's objectives for wider South East Wales region by striking a compromise between achieving our local evidence-based objectives and not undermining the prospects of surrounding local authorities or the ambitions for the National Growth Area of the

	Cardiff Capital Region. Conversely, a lower level of growth would not address the local evidence-based issues and objectives and would therefore fail the tests of soundness. Spatially, the RLDP preparation process has reflected the policies of Future Wales and again Welsh Government noted in its response the Preferred Strategy that it does not object to the settlement hierarchy and distribution of housing growth. Consideration of earlier spatial options for Dispersed Growth and New Settlement and New Settlement with Limited Growth in Primary Settlements, Secondary Settlements and Severnside only, which formed part of the initial Growth and Spatial Options Consultation Paper (June 2019), have been ruled out for the RLDP on the basis that Welsh Government officials have stated that a New Settlement cannot be pursued outside of the Strategic Development Plan or joint LDP processes. Such changes are considered to demonstrate actions taken to ensure general conformity with Future Wales and SDP processes. A further issue of relevance to Monmouthshire is the requirement of Policy 34 for the Strategic Development Plan to identify a green belt to the north of Cardiff, Newport and the eastern part of the region. The South East Wales Regional Strategic Diagram (page 163 of Future Wales) provides an indicative plan of the area for consideration with the detailed boundary to be defined through the preparation of the SDP. In advance of an SDP, the area shown for consideration in Future Wales should be treated as a designated Green Belt. In assessing the spatial strategy for distributing growth within the County consideration has been given to paragraph 3.72 of PPW12 which states that: *"when considering a Green Belt designation, a sufficient range of development land which is suitably located in relation to the existing urban edge should be made available, having regard to the longer term need for development land, the effects of development pressures in areas beyond the Green Belt and the need to minimise demand for travel. This may require land to be safeguarded, and boundaries of proposed Green Belts must be carefully defined to achieve this".*

	Such an approach is essential to address the Council's significant concerns regarding the long-term policy implications of the permanency of a Green Belt designation on future growth and prosperity in Monmouthshire. In this respect, the Deposit Plan is considered to facilitate the identification of a Green Belt in southern Monmouthshire with the primary settlements situated outside the broad coverage, consistent with the indicative plan and meeting the aims of Policy 34 but allowing for an appropriate level of growth in Monmouthshire to address its local challenges and issues. More generally, the overarching policy framework of the Deposit Plan is considered to align with the policy aims of the Future Wales, with many common policy themes running through both. Examples of this include placemaking (Policy 2), active travel (Policy 12), town centre first (Policy 6) and creating resilient ecological networks and enhancing green infrastructure provision (Policy 9). Particularly relevant in a Monmouthshire context is the policy focus on supporting rural communities (Policy 4) and the rural economy (Policy 5) and delivering affordable homes (Policy 7) which are key challenges for the County. In this respect the Deposit Plan is considered to set the policy framework for delivering the policy objectives of Future Wales at a local level. The RDLP provides an opportunity for public sector leadership (Policy 3), with the Caldicot East Strategic Development Site (Policy HA2) including Council-owned land, allowing for different approaches to affordable housing delivery to be explored. Further details of alignment with FW2040 are set out in Section 3 of this paper.
Test 1: Does the plan fit? (Is it clear that the LDP is consistent with other plans?) Questions • Does it have regard to national policy (PPW) and Future Wales?	The formulation of the Deposit Plan has been prepared with full regard to the relevant plans and strategies, whilst recognising that it will need to respond and develop as it progresses through its preparatory process. The national, regional and local plans are where relevant identified within the Plan but also within the background and supporting documents and within the in-combination considerations of the ISA and HRA Reports. The ISA process reviews the relevant policies, plans and programmes and considers their implications in relation to the growth levels and spatial options

• Does it have regard to Well-being Goals? • Does it have regard the Welsh National Marine Plan? • Does it have regard to the relevant Area Statement? • Is the plan in general conformity with the NDF? • Is the plan in general conformity with relevant SDP (when adopted)? • Is it consistent with regional plans, strategies and utility programmes? • Is it compatible with the plans of neighbouring LPAs? • Does it reflect the Single Integrated Plan (SIP) Well-being Plan or the National Park Management Plan (NPMP)? • Has the LPA demonstrated it has exhausted all opportunities for joint working and collaboration on both plan preparation and the evidence base?	considered and have subsequently informed the Strategy, Strategic Policies and associated Development Management Policies. Each of the Test 1 questions is discussed in turn: National Policy (PPW12) and Future Wales The Deposit Plan has regard to national policies and guidance as set out in PPW12 and associated Technical Advice Notes (TANs). The RLDP and supporting documents refer to relevant sections of PPW12 specific to the issue being discussed and the policy requirements of PPW12 have been considered and incorporated where relevant in the preparation of the Strategic Policies and detailed Development Management policies. The supporting text adds further commentary on the links to national guidance. Each of the Strategic Policies is supported by a policy context section which sets out links to the wider policy framework including PPW12 and TANs. The relationship between the Deposit Plan and Future Wales is discussed above and in Section 3 of this Paper. The RLDP is recognised as a key mechanism in delivering the planning policy priorities identified in national policy. Well-Being Goals The Deposit Plan has full regard to the provisions of the Well-being of Future Generations Act 2015 and the well-being goals, as well as the five ways of working as demonstrated by the additional non-statutory consultation and engagement undertaken on the Issues, Vision and Objectives, the Growth and Spatial Options Papers and the Preferred Strategy stage of the plan process. The promotion and recognition of well-being has been a consideration from the outset of the Plan preparation process. The links between the RLDP objectives and the Well-being Goals is clearly set out in the Issues, Vision and Objectives Paper (updated December 2022), which relates and groups the issues and opportunities under the well-being goal themes. Each Strategic Policy provides a table setting out its links to the wider policy framework and which of the well-being goals it will contribute to.

	Welsh National Marine Plan The Strategic Policies and associated Development Management policies cover a number of issues and policy areas which complement the aims and objectives of the Marine Plan. In particular, Strategic Policies S3 – Sustainable Place Making and High Quality Design, S4 – Climate Change and S5 – Green Infrastructure, Landscape and Nature Conservation complement the Marine Plan by directing development away from areas of flood risk, protecting and enhancing green infrastructure and networks and recognising the challenges posed by climate change. The relationship with the Marine Plan is enhanced further through the detailed policies in the Deposit Plan. For example, policies NR2 – Severn Estuary Recreational Pressure, which seeks to ensure that there are no adverse impacts on the integrity of the Severn Estuary SAC, SPA and Ramsar as a result of an increase in visitor pressures and NR3 – Protection of Water Sources and the Water Environment, which looks to ensure development does impact upon quality and quantity of water sources. As such, the policy framework seeks to safeguard the river ecosystem, which flows into the Severn Estuary and National Marine Plan area. **Area Statement** Monmouthshire forms part of the South East Wales Area Statement along with Blaenau Gwent, Caerphilly, Newport and Torfaen, which was published by NRW in March 2020. The Deposit Plan has regard to the Area Statement's strategic themes of Linking Our Landscape; Climate Ready Gwent; Healthy Active Connected; and Ways of Working and through the Strategic Policies seeks to achieve many of the outcomes associated with each theme. Examples of this include Strategic Policy S5 – Green Infrastructure, Landscape and Nature Conservation which is consistent with many of the outcomes sought from the Area Statement including improved resilience of our ecosystems across Gwent and the need to safeguard and enhance core habitat networks and support ecological connectivity on and between our best sites across Gwent. Similarly, Strategic Policies S3 – Sustainable Placemaking and High Quality Design and S4 – Climate Change are consistent in their aims as many of the outcomes associated with Climate Ready Gwent and Healthy Active Connected. Consequently,

	the Deposit Plan is considered to be consistent with the key themes and aims of the South East Wales Area Statement. Future Wales: The National Plan 2040 (February 2021) Conformity with Future Wales is discussed above and in Section 3 of this Paper. Strategic Development Plan (SDP) The preparation of an SDP has not yet formally commenced for the region, however, consultation on a Delivery Agreement is anticipated to be undertaken towards the end of 2024. Monmouthshire County Council has been actively involved in the discussions and agreements put in place to date and Council has formally resolved to be part of the SDP. Regional plans, strategies and utility programmes The Deposit Plan has been prepared within the context of the relevant regional plans, strategies and utility provider programmes, with Appendix 3 of the Plan, associated background papers and the supporting commentary of the strategic and detailed policies providing details of the documents that have been considered. Specific reference is made to the regional assessment of future growth and migration for the Cardiff Capital Region (CCR). This report aims to review how each LPA could contribute towards increasing the number of jobs across the region by 2040 and how the increase in jobs corresponds with projected growth in LPAs, the region and Future Wales 2040. It reviews the migration assumptions underpinning the proposed level of population/jobs growth and the potential implications of the spatial distribution of jobs and people on travel patterns. The study provides a policy-off approach to the assessment of potential growth in the region. As such, it sits alongside and complements RDLP evidence prepared by each authority in the region. It is not intended to replace or supersede the detailed consideration of growth potential prepared by individual authorities to inform the RLDP process.

	The Initial Sustainability Assessment and Habitats Regulations Assessment also consider the in-combination effects of the Plan along with other plans and strategies in the region and conclude that the Plan is in line with both regional and local environmental protection objectives. The preparation of the Deposit Plan has also involved a regional and coordinated approach to the collection of evidence, including population projection modelling and regional employment study, Development Viability Model, Renewable Energy Assessment and Strategic Flood Consequence Assessment. This has provided a consistent and comparable approach to methodologies and a basis to consider the evidence and any implications on a more regional basis as well as at a local level. Long standing regional working methods associated with areas such as waste and minerals are continued and are reflected in the Deposit Plan. Utility companies have been involved from an early stage in the development of the RLDP to ensure consistency with their programmes. For example, extensive discussions have taken place between the Council and Dŵr Cyrmu Welsh Water to identify solutions to the phosphates constraint affecting the County, as well as other utility companies such as Western Power to understand capacity for growth and for renewable energy. Plans of Neighbouring Authorities (LPAs) The Deposit Plan takes into account cross-border issues and the plans of neighbouring authorities and reflects the discussions and agreements reached relating to cross-border issues. Examples include agreement on the approach to the housing numbers attributed to growth in the Brecon Beacons National Park Authority area, growth levels in Torfaen, consideration of Newport's capacity to accommodate an element of Monmouthshire's growth on previously developed land, and discussion with the Forest of Dean regarding their issues and objectives and growth strategy with particular reference to infrastructure impact on Chepstow. Further details of joint working and collaboration are set out in Appendix 3 of the Plan. As noted above, in recognition of the value of working with neighbouring authorities, and in response to PPW12 and the Development Plans Manual (Ed 3, March 2020) emphasis on collaborative working, we have worked on or are working on a number of pieces of evidence together. These include:

	regional assessment of future growth and migration for the Cardiff Capital Region (CCR), a Larger than Local Employment Study, Population and Household Projections, Integrated Sustainability Appraisal, Habitats Regulation Assessment, Development Viability Model and Renewable Energy Assessment. In addition, work undertaken by SEWSPG and topic-based Pathfinder groups, have helped establish a common approach to a number of Plan preparation tasks including candidate sites assessments, sustainable settlement appraisals and retail and employment land monitoring. Regard will continue to be had to the emphasis on regional working in light of future provisions around Strategic Development Plans and Future Wales. Single Integrated Plan (SIP), Well-being Plan or the National Park Management Plan (NPMP) In 2021 a new Gwent wide well-being Public Service Board (PSB) was established replacing the five separate Public Service Boards in the Gwent region (Blaenau Gwent, Caerphilly, Newport, Monmouthshire and Torfaen), forming the Gwent PSB. The Gwent PSB Well-Being Plan was published in 2023 and sets out what the PSB could do over the next five years to tackle the social, economic, environmental and cultural issues which can affect well-being in Gwent. The Well-Being Plan contains two main objectives; to create a fairer, more equitable and inclusive Gwent for all and a climate-ready Gwent, where our environment is valued and protected, benefitting our well-being now and for future generations. The Well-Being Plan then identifies five steps that will help to achieve the two well-being objectives. The RLDP objectives as shown in Table 1 of the Deposit Plan sets out the Gwent PSB Well-Being Plan steps that are considered to correspond with the RLDP objective to illustrate where the two align and illustrate how the RLDP will help to deliver on the Gwent PSB Well-Being Plan. The Strategic Policies also set out which of the Well-being Plan objectives it has a particular link to. Prior to the formulation of the Gwent PSB, the Monmouthshire Well-being Plan was prepared by the Monmouthshire PSB and endorsed in February 2018. The RLDP Issues, Vision and Objectives are heavily drawn from and reflect the Monmouthshire PSB Well-being Plan which was extensively consulted upon by the Public Service Board in 2017 and resulted in contributions from more than

	1,400 people. This approach reflects Welsh Government guidance which recognises the significance of local well-being plans as a key evidence source for LDP preparation (paragraphs 1.6 and 1.21, PPW12). In this respect, the Monmouthshire Well-being Plan was an integral part of the non-statutory stages ensuring it seeks to address key issues identified for Monmouthshire. In 2022, Monmouthshire County Council published Taking Monmouthshire Forward, a Community and Corporate Plan covering the period 2022-2028. It establishes the Council's purpose is for Monmouthshire to be "a zero-carbon county, supporting well-being, health and dignity for everyone at every stage of life". It sets out the objectives and values that will be adhered to and the actions needed to meet this purpose. These objectives and values are embodied in the RLPD strategy, with specific alignment between the RLDP and Corporate Plan's objectives highlighted in Table 1 of the Deposit Plan. The objectives each Strategic Policy support is also set out in the Links to Wider Policy Framework tables noted after each Strategic Policy. The area of Brecon Beacons National Park that sits within Monmouthshire County Council's administrative area is excluded from the extent of the RLDP's geographical area and does not form part of Monmouthshire's Planning Authority remit. The relationship and impact on the Brecon Beacons National Park, does, however, remain a significant consideration for the preparation of the RLDP. The RLDP is considered to reflect the aims of Y Bannau: The Future, the Management Plan for Bannau Brycheiniog National Park (2023 – 2028) and its five inter-connected missions relating to Climate, Water, Nature, People and Place with the complexities in balancing these goals represented in adapted version of the 'Doughnut' model of social and ecological boundaries. Many of the Plan's policies seek to deliver the same outcomes as Y Bannau: The Future. Joint Working and Collaboration on both plan preparation and the evidence base As demonstrated above, a significant amount of the evidence base has been commissioned on a joint basis with Blaenau Gwent and Torfaen and on a sub-regional basis with Blaenau Gwent, Torfaen,

	Caerphilly and Newport. We have held regular joint meetings to ensure there is a consistency of approach. Further details of joint working and collaboration are set out in Appendix 3 of the Deposit Plan and specific examples referenced throughout the Preferred Strategy in relation to the Strategic Policies. On-going meetings and collaboration are pursued through the longstanding South East Wales Strategic Planning Group (SEWSPG), the Planning Officers South Wales (POSW) and the South East Wales Planning Officer Society (SEWPOS).
• Test 2: Is the plan appropriate? (Is the plan appropriate for the area in the light of the evidence?) Questions • Is it locally specific? • Does it address the key issues? • Is it supported by robust, proportionate and credible evidence? • Can the rationale behind plan policies be demonstrated? • Does it seek to meet assessed needs and contribute to the achievement of sustainable development? • Are the vision and the strategy positive and sufficiently aspirational? • Have the 'real' alternatives been properly considered? • Is it logical, reasonable and balanced? • Is it coherent and consistent? • Is it clear and focused?	Is it Locally Specific? In order to address the key issues and challenges facing Monmouthshire, the Deposit Plan builds upon the Adopted Local Plan objectives, taking account of a range of other policy drivers including the Well-Being of Future Generations Act 2015, the Gwent Public Service Board (PSB) Well-being Plan (this replaces the objectives previously set out in the Monmouthshire PSB Well-being Plan and the Council's Community and Corporate Plan. In this respect, the formulation of the Deposit Plan and the stages that came before, has been underpinned by this locally specific evidence base. Building on this and the extensive non-statutory consultation that has been undertaken to date (see Appendix 2 of the Deposit Plan for a summary) the Deposit Plan's overarching strategy has emerged as a direct result of a number of very locally specific issues, with a number of core objectives becoming apparent as the Plan has progressed: delivering affordable housing to help address inequality, rebalancing the County's demography to ensure communities are socially and economically sustainable, responding to the climate and nature emergency to ensure proposals are environmentally sustainable and supporting and enabling sustainable economic growth. The Plan also responds to a number of challenges that have arisen following stakeholder consultation and engagement on the earlier non-statutory stages. Of note is the Welsh Government objection to the level of growth set out in that June 2021 Preferred Strategy and the issue of phosphate water quality issues in the River Wye and River Usk.

	The Plan's Growth Strategy as set out in Strategic Policies S1 and S2 propose a level and distribution of growth that has regard to these locally specific issues, whilst also ensuring that the RLDP delivers on our objectives and addresses our core issues of delivering affordable homes, responding the climate and nature emergency by delivering net zero carbon homes and ensuring our communities are socially and economically sustainable be attracting and retaining younger people to rebalance our ageing demographic. Does it address key issues? Each Strategic Policy highlights the links to the RLDP objectives, Gwent PSB Well-being Plan objectives and the Monmouthshire Community and Corporate Plan objectives. These locally specific, key issues are referenced extensively throughout the Deposit Plan and have formed the principal rationale for choosing the policy approach taken. Key issues addressed by the Plan include: • Delivering a level of growth (homes and jobs) that address our local issues, having regard to Welsh Government's comments regarding alignment with Future Wales: the National Plan 2040. • Maximising affordable housing delivery on new housing allocations, reflecting the Council's commitment to deliver 50% affordable homes on new housing sites. • Requiring new homes to be net zero carbon reflecting our commitment to responding to and tackling climate change. • Promoting sustainable economic growth. • Identifies Strategic Site Allocations within the primary settlements of Abergavenny, Caldicot (including Severnside), Chepstow and Monmouth, Monmouthshire's most sustainable locations that have opportunities and potential to connect and link with regional travel aspirations, in particular identified opportunities at Severn Tunnel Junction and the South East Wales Metro Scheme. • Lower level of growth in the most sustainable lower tier settlements to deliver affordable homes and address rural inequality and rural isolation in these areas.

	Is it supported by robust, proportionate and credible evidence? Extensive evidence building has been undertaken to support the Deposit Plan which is available to view on the Council's website. Further work will be undertaken during the Plan preparatory process as appropriate and necessary. **Can the rationale behind plan policies be demonstrated?** The evidence gathered to date has informed the preparation of the Plan and its overarching strategy and policies, which need to be read in conjunction with one another in order to gain an understanding of the overall policy direction of the Plan. Each strategic policy has a reasoned justification and a summary table setting out how it relates to the relevant RLDP objectives, national policy, and Well Being Goals, as well as the key evidence. They are also supported by a series of detailed development management policies, which will help deliver on the aims of the strategic policies. All policies reference the relevant sections of PPW12, combined with any regionally or locally specific evidence forming a key approach to establishing the rationale to the Plan's policies. Policy areas are also supported by Background Papers, where relevant, to add further evidence to the rationale behind a policy approach. **Does it seek to meet assessed needs and contribute to the achievement of sustainable development?** The Deposit Plan is derived from evidence that assesses the needs of the County, particularly in respect of homes (both market and affordable) and jobs, as well as the need to protect the most valuable areas of land. The Growth and Spatial Options Paper (September 2022) and Integrated Sustainable Appraisal (2024) accompanying the RLDP, appraise the Deposit's contribution to locally specific needs and sustainable development credential respectively. The Integrated Sustainability Appraisal process has an integral and iterative role in the preparation of the RLDP. In this respect, its use in testing or measuring the performance of the RLDP from its inception through to the preparation of the Deposit Plan is indicative of the iterative feedback between the ISA and the RLDP as work progresses.

	When assessed against the ISA themes the Deposit Plan is predicted to have a positive significant effect on themes including economy and employment, population and communities, health and wellbeing, equalities, diversity, and social inclusion and transport and movement in recognition of the Plan's proposing to deliver new employment and homes including tackling the affordable housing challenge, distributed to the higher tier settlements, where there is greater need and better access to sustainable transport modes and wider infrastructure. Minor positive effects are considered most likely in relation to the biodiversity and geodiversity ISA theme reflecting the policy framework in place to avoid adverse impacts on biodiversity and the policy requirement to bring forward biodiversity net gains and ecological connectivity. Significant negative effects are predicted in relation to the natural resources (air, land, minerals and water) ISA themes due to the substantial (and unavoidable) loss of greenfield and agricultural land. The ISA recognises that there are limited brownfield opportunities within Monmouthshire and that the Plan works well to allocate strategic site adjacent to built up areas. Minor negative effects are considered likely in relation to the landscape theme recognising that whilst development will impact upon landscape character and quality in Monmouthshire, the RLDP works well to reduce this impact by allocating sites within settlement boundaries and outside of landscape designations. Furthermore, the development policies and wider policy provisions under the RLDP work to maintain and enhance landscape character and quality. Effects remain uncertain in relation to the historic environment ISA theme due to the proximity of the strategic site allocations to heritage features, however it also recognises that there are notable policy provisions that will benefit the historic environment by protecting features and the setting they are located within. A neutral effect is considered most likely in relation to climate change adaptation and its relationship to flooding reflecting the allocation of sites at little or no risk of flooding. However, a minor negative effect is concluded in terms of climate change mitigation due to the level of growth proposed through the housing policies, although the ISA recognises the policies that seek to reduce emission.

	In addition, the Local Housing Market Assessment has provided key evidence on the level of affordable housing need in the County. An Employment Land Review has been undertaken to quantify the future employment land requirements based on the Welsh Government Practice Guidance for Economic Development, supplemented by Monmouthshire's Economy, Employment and Skills Strategy (2023). The need for homes and jobs has also been considered alongside the need to protect the County's land resources for environmental, agricultural and nature conservation purposes. The balance to be achieved between these differing and sometime competing needs has been a key focus of the RLDP as it progressed to the Deposit stage. The Plan's contribution to the RLDP locally specific objectives is discussed above, which concludes that the Strategy/Plan performs well against addressing the needs of the County, with Plan's overarching strategy emerging as a direct result of a number of very locally specific issues, with a number of core objectives becoming apparent as the Plan has progressed: delivering affordable housing to help address inequality, rebalancing the County's demography to ensure communities are socially and economically sustainable, responding to the climate and nature emergency to ensure proposals are environmentally sustainable and supporting and enabling sustainable economic growth. The hierarchy of settlements has been developed taking account of the sustainability credentials of each settlement and how they can contribute to their wider communities. This hierarchy recognises and acknowledges the availability of services and facilities, accessibility issues and other considerations. Reference should be made to the Sustainable Settlement Appraisal Background Paper (December 2022) for full details. This work has formed the basis for the proposed spatial strategy, which seeks to ensure development is located in the most sustainable settlements within a Monmouthshire context. Are the vision and the strategy positive and sufficiently aspirational? The RLDP Vision has been developed to take into account the key challenges and opportunities for change, whilst being aspirational and positive enough to seek a reversal to the otherwise projected decline in job numbers and younger age groups present in the County. The vision for growth is a

	positive one which seeks to create high quality, sustainable places in both urban and rural settlements within a Monmouthshire context. The Plan's strategy takes a positive, yet realistic approach to achieving growth within the context of Monmouthshire and tackling key national and local issues, such as the provision of affordable homes, growing Monmouthshire's economic base, tackling climate change and creating sustainable places to live and work in. The strategy is considered to present a balanced approach to growth by putting forward a strategy that is aspirational enough to address a number of key issues facing the County, whilst also having regard to Welsh Government Officer concerns regarding alignment with Future Wales: the National Plan 2040. Have the 'real' alternatives been properly considered? A number of different alternative growth and spatial options are considered in the Growth and Spatial Options Paper (September 2022), and also against the ISA themes through the Integrated Sustainability Assessment process. Having regard to the outcome of these assessments, four options setting out different combinations of growth and spatial options as set out in the Growth and Spatial Options Paper (September 2022) were considered as part of the Progressing the Monmouthshire's Replacement Local Development Plan Council Report on 27th September 2022. These were: • Option 1: Proceed with the previous Preferred Strategy that we consulted on in July-August 2021; • Option 2: Adopt an amended approach and proceed with a demographic-led strategy (based on the latest detailed population data) and an amended spatial strategy to take account of the phosphate constraint in the River Wye catchment. This is the recommended option; • Option 3: Proceed with the WG prescribed maximum dwelling requirement (4,275 dwellings over the Plan period), and a spatial strategy that takes account of the phosphate constraint in the River Wye catchment; or • Option 4: Restart the RLDP process. Council endorsed option 2 as the basis for progressing the RLDP as set out in the 2022 Preferred Strategy.

	Following consultation on the 2022 Preferred Strategy, which took place between December 2022 and January 2023, a report was taken to Council in October 2023 to seek endorsement of a number of updates to the Preferred Strategy as the basis for the ongoing preparation of the Deposit Plan. As a result of the consultation, a small number of key changes to the Preferred Strategy were agreed and incorporated into the Deposit Plan: • The factual update to include 2022/23 data in the spatial distribution of housing table (this has since been updated to incorporate 2023/24 data). • Identification of a strategic site in Monmouth in response to Dwr Cymru Welsh Water investment and Welsh Government advice, together with changes to how the previously termed 'bonus sites' are factored into the housing figures. • Changing the strategic site in Chepstow. • Increasing the flexibility level from 10% to 15% and consequential adjustments to the spatial distribution of housing tables. • Enhancing the sustainability credentials and energy efficiency of new homes to be net zero carbon homes rather than net zero ready homes. The extensive consultation that has been undertaken on the non-statutory stages of the Plan process and the changes that have been made as a result of those consultation exercises, is considered to sufficiently demonstrate that 'real' alternatives have been considered throughout the plan process. In addition the ISA also includes an assessment of reasonable alternatives in relation to the level of growth, location of growth and strategic growth area options. Is it logical, reasonable and balanced? The Deposit Plan has emerged from a clear understanding of the issues at a national, regional and local level. It has considered a range of options and has had regard to the views expressed during the non-statutory consultation and engagement exercises to date and made changes to the options considered as a result. The Plan has emerged from engagement and evidence and as such it is considered to be logical and reasonable within the context of the issues facing Monmouthshire. It is

	considered to provide a balanced approach that integrates with other plans and strategies, whilst ensuring it is reflective of national policy and the need for a sustainable and deliverable Plan. Is it coherent and consistent? The Deposit Plan sets out a coherent strategy from which its strategic and detailed policies flow. The strategy is guided by, and consistent with, the Plan vision and objectives, the principles of sustainability and placemaking set out in national planning guidance, the growth and spatial options and the evidence base. Is it clear and focused? The Deposit Plan is set out in a clear and logical form, clearly showing the links between the various elements of the overarching Strategy. It provides a clear focus of its purpose, identifying the vision and issues associated with the Plan and how the Plan will seek to address these.
Test 3: Will the plan deliver (Is it likely to be effective?) Questions • Will it be effective? • Can it be implemented? • Is there support from the relevant infrastructure providers both financially and in terms of meeting relevant timescales? • Will development be viable? • Can the sites allocated be delivered?	Will it be effective? The RLDP's objectives have emerged from an understanding of the challenges and needs of Monmouthshire as well as a sound, logical and robust evidence base. The strategy seeks to integrate and reflect other plans and strategies as part of an integrated approach to delivery, maximising its opportunities to be effective in its implementation. The RLDP makes provision for 6,210 homes, including a 15% flexibility allowance to meet a requirement of 5,400 homes over the Plan period, including the provision of up to 2,000 affordable homes. This level of growth will enable the provision of market and affordable housing and provides the opportunity to address the unbalanced demography, improve labour force retention and assists in the County's housing affordability challenge. In order to meet the housing provision figure of 6,210 homes, the RLDP makes 18 new housing/mixed use allocations for 2,305 new homes reflecting the number of units that already have planning permission or that will be delivered via other housing supply streams, such as windfall and infill sites.

• Is the plan sufficiently flexible? Are there appropriate contingency provisions? • Is it monitored effectively?'	These new allocations provide the Council with the opportunity to open up longer term directions for strategic growth and implement place-making and climate change principles. The Plan also allocates 57ha of B Use Class employment land to meet the minimum requirement of 38ha and provides the planning policy framework to facilitate the growth of the resident workforce to support 6,240 jobs over the Plan period to help grow Monmouthshire's economic base and reduce the out-commuting experienced within the County. This level of job growth aligns with the projected population and housing growth and takes account of adjustments to household membership rates for key younger age groups and a reduced level of commuting by retaining more of the resident workforce. Responding to the climate and nature emergency, the RLDP establishes the requirement for new homes to be net zero carbon, reflecting the Council's commitment to responding to and tackling climate change. New housing allocations have also been made on a 50% affordable homes basis, delivering on the key objective of providing more affordable homes in the County. Can it be implemented? The preparation of the Deposit Plan is with the clear intention that it will be implementable and that its policies and proposals will be delivered within the Plan period. The Deposit Plan sets out a deliverable spatial framework and growth levels which are based on sustainability principles and responsive to the needs of the communities of Monmouthshire. The policies and proposals (both strategic and detailed) provide the framework through which the Plan's objectives will be implemented and the decision-making process undertaken. More detailed assessment work, covering issues such as viability, phasing and deliverability of sites forms part of the extensive evidence base supporting the Deposit Plan. The level of affordable housing noted above aligns with the Council commitment of ensuring that new site allocations provide 50% affordable housing. In order for residential sites to be allocated in the RLDP, it has been a pre-requisite that site promoters demonstrate that sites are viable and deliverable, having regard to the Council's commitment for 50% affordable housing provision on new

	sites. To ensure the site delivers on the key priorities of the RLDP, site specific policies have been prepared for every housing allocation and an Infrastructure Delivery Plan (Appendix 8 of the RLDP) has also been prepared which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of the allocated sites. Housing and employment trajectories are also included in the Deposit Plan setting out anticipated timescales for the delivery of site allocations. Providing for the level of jobs growth is part of a complex picture, including the provision of a deliverable range of employment land supply, in appropriate locations. It will also be achieved through the allocation of 57ha of employment land to meet a minimum requirement of 38ha of employment land to facilitate the delivery of industrial and business employment uses. The RLDP will also include a policy framework to support job growth from other key employment sectors including retail, leisure and tourism. Details of the net zero carbon homes policy are set out in Policy NZ1 – Monmouthshire Net Zero Carbon Homes. The Deposit RLDP sets out an effective and appropriate monitoring framework, which will form the basis for undertaking the Annual Monitoring Report (AMR). The AMR will represent the main method for measuring and assessing the progress in the implementation of the policies and proposals of the adopted RLDP. **Is there support from the relevant infrastructure providers both financially and in terms of meeting the relevant timescales?** Infrastructure providers are an important component in developing the RLDP and form a key consultee. In this respect they have and will continue to be engaged throughout the Plan making process. Extensive discussions have taken place between the Council and Dŵr Cymru Welsh Water and NRW to identify workable solutions to the phosphates water quality issue. Other infrastructure providers have also been involved in on-going discussion including Western Power, the Aneurin Bevan University Health Board, Transport for Wales, and the Local Education Authority. The RLDP is supported by an Infrastructure Delivery Plan (Appendix 8 of the RLDP) and site-specific viability

	assessments which have factored in appropriate costs and timescales for supporting infrastructure to be provided. Will the development be viable? The Plan is supported by a high-level affordable housing viability evidence and detailed 'site specific' viability assessments that have used the Development Viability Model, which was developed by Burrows-Hutchinson Ltd on behalf of SEWSPG, establishing a robust and consistent methodology for assessing viability across authorities in the south east Wales region. This demonstrates that on-site provision of 50% affordable homes is achievable throughout most of the County on sites of 20 homes or more. On sites of 5-19 homes, on-site provision of 40% affordable homes is evidenced to be achievable. The affordable housing thresholds are set out in Strategic Policy S7 and reflect the outcomes of the viability evidence. The input of a Viability Steering Group has also informed the viability process to ensure key inputs reflect market conditions in Monmouthshire. This site-specific information together with viability modelling has been used to evidence that the sites allocated in the Deposit Plan are viable. Each proposed housing allocation is supported by robust technical and viability evidence. The individual site-specific viability assessments that accompany each allocation reflect the circumstances specific to that development whilst also applying a standard approach/cost to variables agreed as part of the Viability Steering Group, where relevant. The site-specific assessments have been periodically updated throughout the plan preparation to ensure they capture the latest costs, values and planning obligation requirements as well key policy requirements such as 50% affordable homes and net zero carbon homes. The latest round of site-specific viability assessments reaffirmed that the proposed allocations are viable and can accommodate the Plan's policy requirements. Can the sites allocated be delivered?

	In addition to the viability evidence noted above, the Plan is also accompanied by a housing trajectory, which demonstrates the phasing and delivery of housing over the lifetime of the plan. This has been produced in consultation with site promoters and wider stakeholders to ensure realistic phasing and delivery rates have been considered. The Infrastructure Delivery Plan (Appendix 8 of the RLDP) also demonstrates how infrastructure provision has been considered in tandem to support the housing trajectory. Is the Plan sufficiently flexible? Are there appropriate contingencies in place? The RLDP has been designed to provide a flexible policy framework which is capable of providing certainty on how much growth is proposed and its broad distribution, but flexible enough to consider appropriate and acceptable opportunities that may arise during the Plan period, such as windfall sites and rural enterprise developments. The dwelling and employment land requirement figures contain a flexibility allowance to allow for unforeseen circumstances that may emerge through the Plan period. In December 2022, the Preferred Strategy (2022) was published for public consultation between the period 5th December 2022 and 30th January 2023. The Preferred Strategy included a housing requirement figure of 5,400 homes and included a flexibility allowance of 10%, caveated that this was subject to review as part of the Deposit Plan preparation. In October 2023, a report was taken to Full Council to seek Council's endorsement of a number of post-consultation updates to the Preferred Strategy. An increase in the flexibility rate from 10% to 15% was one of the updates agreed. The increase in flexibility from 10% to 15% increases the housing provision from 5,940 to 6,210 homes and resulted in an additional 270 units being added to the total figure to be provided for in the RLDP. The Council report justifies the increase in the flexibility allowance on the following basis: • It ensures the strategic sites at Abergavenny East and Caldicot East are sufficiently large to deliver the required infrastructure whilst allowing the allocation of smaller sites across the County to sustain and enhance existing communities. • Ensures that the Plan is more robust and resilient as there is delivery in the short-term while the large strategic sites take time to be developed out.

	• Will result in the Plan being able to provide a range and choice of sites and ensure that the plan is not solely reliant on the delivery of larger strategic sites which are more complicated to develop. • A range of smaller sites will ensure the delivery of much needed affordable housing after the adoption of the plan to start addressing current unmet affordable housing need. As evidenced through the housing trajectory, this level of flexibility comfortably demonstrates delivery of the Anticipated Annual Build Rate (AABR) throughout the Plan period. The flexibility allowance has been reviewed and increased to ensure the Plan will remain effective in the event of changing circumstances. Similarly, in order to support the Plan's economic growth aspirations, 57ha of B Use Class has been allocated to meet the minimum requirement of 38ha. This allows for a range of employment sites to be allocated to meet a range of employment needs throughout the County. The Plan also provides a supportive policy framework to provide a flexible approach to economic opportunities that might come forward throughout the Plan period. Is it monitored effectively? An effective and appropriate monitoring framework has been developed and included within the Plan and will form the basis for undertaking the Annual Monitoring Report (AMR). The AMR represents the main method for measuring and assessing the progress in the implementation of the policies and proposals of the adopted RLDP. In the meantime, a number of annual monitoring exercises will continue to be undertaken to help ensure evidence is up-to-date. This includes the annual housing surveys, Employment and Retail Surveys and preparation of the Adopted LDP Annual Monitoring Reports.

3. General Conformity with Future Wales: The National Plan 2040 Assessment

3.1. Future Wales: The National Plan 2040 (referred to as Future Wales from this point on) was published by Welsh Government in February 2021 to promote development that enhances well-being and quality of life in Wales. It considers the issues significant to Wales's prosperity and well-being, such as the economy, housing, transport, energy, and the environment. It identifies where national developments should take place, where the key growth areas are and what infrastructure and services are needed. It is set in the context of a vision that will help deliver sustainable places across Wales by 2040, by supporting placemaking and ensuring our choices direct development to the right places, making the best use of resources, creating and sustaining accessible healthy communities, protecting our environment and supporting prosperity for all.

3.2. The requirement for a development plan to be in general conformity with the upper tier statutory development plan in Wales is set out in primary legislation. Planning Policy Wales 12 and the Development Plans Manual (March 2020) provide additional guidance on how to assess general conformity. Paragraph 2.18 of the Development Plans Manual notes that "the fact that a development plan may be inconsistent with one or more polices in the upper tier plan, either directly or through the omission of a policy/proposal, does not, by itself, mean that the plan is not in general conformity. Rather, the fundamental point is how significant the inconsistency is from the point of view of delivery of the upper tier plan". It goes on to note in paragraph 2.19 "whilst it would be acceptable for the lower tier plan to provide further detail in relation to making it more locally distinctive, it fundamentally must not undermine the overarching strategy, policies or proposals in the upper tier plan(s)". The requirement to be in general conformity with Future Wales is also a test of soundness and will be tested through the examination process.

3.3. The purpose of this Appendix is to demonstrate that the Monmouthshire Deposit Replacement Local Development Plan assists in the delivery of the Future Wales policies and is in general conformity with its overarching strategy.

3.4. The following section assesses whether the RLDP objectives and Strategic Policies set out in the RLDP are considered to be in general conformity with Future Wales Policies using the traffic light model below:

RLDP is considered to be in general conformity with the Future Wales 2040 policy objective.
RLDP is considered to make a neutral contribution to the Future Wales 2040 policy objective.

RLDP is not considered to be in general conformity with the Future Wales 2040 policy objective.

Future Wales Policy	Relevant RLDP Objectives and RLDP Strategic Policies	General Conformity with FW Strategy
Policy 1 – Where Wales will grow The Welsh Government supports sustainable growth in all parts of Wales. In three National Growth Areas there will be growth in employment and housing opportunities and investment in infrastructure. The National Growth Areas are: • Cardiff, Newport and the Valleys • Swansea Bay and Llanelli • Wrexham and Deeside The National Growth Areas are complemented by Regional Growth Areas which will grow, develop and offer a variety of public and commercial services at regional scale. There are Regional Growth Areas in three regions: • The South West • Mid Wales • The North	RLDP Objectives: Objective 1 – Economic Growth / Employment Objective 6 – Land Objective 9 – Demography Objective 10 – Housing Objective 12 – Communities Objective 13 – Rural Communities Preferred Strategy Strategic Policies: S1 – Growth Strategy S2 – Spatial Distribution of Development – Settlement Hierarchy	Monmouthshire is not identified as a growth area in Future Wales, however, the policy allows for growth in towns and villages in rural areas of an appropriate scale and to support local aspiration and need. The RLDP growth level has emerged from an understanding of the issues, challenges and needs of Monmouthshire as well as a sound, logical and robust evidence base. The Council has considered how best to progress the RLDP having regard to a number of challenges that have arisen following stakeholder consultation and engagement on the non-statutory stages. In response to the Preferred Strategy (Dec 2022), consultation Welsh Government formally responded with a 'green' rating and noting that *"Future Wales places great emphasis on the development of National Growth Areas and the need for additional affordable housing. The Preferred Strategy is in general conformity with Policies 1, 7 and 33 of Future Wales and does not*

Development and growth in towns and villages in rural areas should be of appropriate scale and support local aspirations and need.	S7 – Affordable Homes S8 – Site Allocations and Placemaking Principles S10 – Employment Sites Provision S13 – Sustainable Transport	*undermine the role of Cardiff, Newport and the Valleys as the main focus for growth and investment in the south east region, but reflects the urgent need to increase the supply of affordable housing in Monmouthshire."* In this respect the overarching strategy of the Deposit Plan has been accepted as being in conformity with Future Wales by Welsh Government. Although Monmouthshire is not within the national growth area identified in Future Wales 2040: The National Plan, our evidence shows that the proposed level of growth is essential to deliver our local evidence-based issues and objectives and to ensure the RLDP is 'sound'. It is supported by policies 3, 4, 5 and 7, which support public leadership and the use of public land to deliver on ambitious affordable housing targets, demographically balanced rural communities, the rural economy and the delivery of affordable homes. The growth strategy will assist in addressing our core issues without harming or compromising Welsh Government's objectives for wider South East Wales region. On the basis of the evidence prepared to support the RLDP, is it considered the level and distribution of growth proposed is of an appropriate scale to specifically address local aspirations and needs.

Policy 2 – Shaping Urban Growth and Regeneration – Strategic Placemaking 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. Urban growth and regeneration should be based on the following strategic placemaking principles: • creating a rich mix of uses; • providing a variety of housing types and tenures; • building places at a walkable scale, with homes, local facilities and public transport within walking distance of each other; • increasing population density, with development built at urban densities that can support public transport and local facilities; • establishing a permeable network of streets, with a hierarchy that informs the nature of development; • promoting a plot-based approach to development, which provides opportunities for the development of small plots, including for custom and self-builders; and • integrating green infrastructure, informed by the planning authority's Green Infrastructure Assessment.	RLDP Objectives: Objective 3 – Green Infrastructure, Biodiversity and Landscape Objective 8- Health and Well-being Objective 11 – Placemaking Objective 12 – Communities Objective 13 – Rural Communities Objective 15 – Accessibility Objective 16 – Culture, Heritage and Welsh Language RLDP Strategic Policies: S3 – Sustainable Placemaking and High-Quality Design S5 – Green infrastructure, Landscape and Nature Conservation S8 – Site Allocation Placemaking Principles S13 – Sustainable Transport	The Strategic Policy Framework supported by detailed policies, seeks to ensure development contributes to the creation of sustainable places that focus on delivering placemaking and ensuring Monmouthshire's communities are sustainable in the long terms and are attractive places to live, work and visit. The policy framework set out in the Deposit Plan is considered to reflect the policy objectives of the Future Wales policy and provide the basis to make a significant contribution to placemaking objectives at the local level within Monmouthshire. The Deposit Plan focuses growth on the four primary settlements of Abergavenny, Caldicot (including Severnside), Monmouth and, to a lesser extent, Chepstow. The Strategy identifies four Strategic Development Sites which will deliver sustainable and well-connected urban extensions. The sites will have good walking and cycling links to the respective town centres and railway stations and public transport links. The larger Abergavenny and Caldicot sites will deliver a mix of uses and amenities on site. Input from the Design Commission for Wales has also helped shape the progression of the Strategic sites and identify key placemaking parameters. In addition, a range of other housing sites are allocated throughout the County in our most

Planning authorities should use development plans to establish a vision for each town and city. This should be supported by a spatial framework that guides growth and regeneration, and establishes a structure within which towns and cities can grow, evolve, diversify and flourish over time.	S15 – Community and Recreation Facilities	sustainable settlements as identified by the Sustainable Settlement Appraisal. All residential allocations must comply with Policy S8 – Site Allocation Placemaking Principles and site-specific requirements which are set out in individual site allocation policies. Overall, the RLDP is considered to be in conformity with the principles set out in Policy 2 of Future Wales.
Policy 3 – Supporting Urban Growth and Regeneration – Public Sector Leadership The Welsh Government will play an active, enabling role to support the delivery of urban growth and regeneration. The Welsh Government will assemble land, invest in infrastructure and prepare sites for development. We will work with local authorities and other public sector bodies to unlock the potential of their land and support them to take an increased development role. The public sector must show leadership and apply placemaking principles to support growth and regeneration for the benefit of communities across Wales. The public sector's use of land, developments, investments and actions must build sustainable places that improve health and well-being.	RLDP Objectives: Objective 1 – Economic Growth / Employment Objective 10 – Housing Objective 11 – Placemaking Objective 14 – Infrastructure RLDP Strategic Policies: S1 – Growth Strategy S2 – Spatial Distribution of Development – Settlement Hierarchy S3 – Sustainable Placemaking & High-Quality Design	The Deposit Plan policy framework establishes the direction for the RLDP to ensure sustainable growth in the County, embodying the principles set out in the Community and Corporate Plan of tackling inequality, protecting our environment and adapting to a world being reshaped by climate change. Monmouthshire County Council recognise the significant role it must play in providing public leadership in achieving this aim. To deliver on these key objectives sites allocated in the RLDP have been required to demonstrate that they are viable and deliverable, having regard to the Council's commitment for 50% affordable housing provision on new site allocations, the requirement for net zero carbon homes and associated infrastructure to ensure the development is sustainable and well-connected. This commitment could have financial implications for the Council of reduced land sale receipts. It may also

Planning authorities must take a proactive role and work in collaboration with the Welsh Government and other public sector bodies to identify the best locations for growth and regeneration, and provide certainty about how they should be developed.	S5 – Green Infrastructure, Landscape and Nature Recovery S6 – Infrastructure Provision S7– Affordable Homes S8 – Site Allocation Placemaking Principles S12 – Employment Sites Provision	require Welsh Government policy position changes on use of Social Housing Grant of other public funding. The suggested approaches are supported by Policy 3 of FW which supports public leadership and the use of public land to deliver on ambitious affordable housing targets. One of the Strategic Site Allocations is promoted by a Registered Social Landlord, and another extends onto Council-owned land offering opportunities to deliver affordable housing is a different way.
Policy 4 – Supporting Rural Communities The Welsh Government supports sustainable and vibrant rural communities. Strategic and Local Development Plans must identify their rural communities, assess their needs and set out policies that support them. Policies should consider how age balanced communities can be achieved, where depopulation should be reversed and consider the role of new affordable and market housing, employment opportunities, local services and greater mobility in tackling these challenges.	RLDP Objectives: Objective 1 – Economic Growth / Employment Objective 8 – Health and Well-being Objective 9 – Demography Objective 10 – Housing Objective 11 – Placemaking Objective 12 – Communities Objective 13 – Rural communities Objective 16 – Culture, Heritage and Welsh Language RLDP Strategic Policies:	The issues identified in Policy 4 of Future Wales are directly related to the issues and challenges that the Monmouthshire RLDP is seeking to address. The RLDP proposes a level and distribution of growth that provides the opportunity to address the County's key issues/challenges including an unbalanced demography, improve labour force retention and out-commuting rates and assist in the County's housing affordability challenge. In this respect the Deposit Plan is considered to offer a significant contribution to achieving the objectives of Policy 4 of Future Wales whilst also being the most conducive to achieving the RLDP vision and the Council's core purpose of building sustainable and resilient communities across Monmouthshire.

	S1 – Growth Strategy S2 – Spatial Distribution of Development – Settlement Hierarchy S3 – Sustainable Placemaking & High-Quality Design S7 – Affordable Homes S11 – Rural Enterprise S12 – Visitor Economy S13 – Sustainable Transport	
Policy 5 – Supporting the rural economy The Welsh Government supports sustainable, appropriate and proportionate economic growth in rural towns that is planned and managed through Strategic and Local Development Plans. Strategic and Local Development Plans must plan positively to meet the employment needs of rural areas including employment arising from the foundational economy; the agricultural and forestry sector, including proposals for diversification; start-ups and micro businesses. The Welsh Government also strongly supports development of innovative and emerging technology businesses and sectors to help rural areas unlock their	Objective 1 – Economic Growth / Employment Objective 9 – Demography Objective 11 – Placemaking Objective 12 – Communities Objective 13 – Rural Communities Objective 16 – Culture, Heritage and Welsh Language RLDP Strategic Policies: S1 – Growth Strategy	A significant issue for Monmouthshire is the need to sustain and regenerate the County's rural economy consistent with the policy aims of Policy 5 of Future Wales. The Deposit Plan provides the policy framework to allow for an appropriate amount of diversification and enterprise in rural areas as well as the infrastructure both physical and digital to facilitate this. The Plan also recognises the role the agricultural and forestry, tourism and leisure sectors play in Monmouthshire's economy and seeks to facilitate their growth at an appropriate scale. The Plan is supplemented by a range of employment/economy-based evidence including the Economy, Employment and Skill Strategy.

full potential, broadening the economic base, and creating higher paid jobs.	S2 – Spatial Distribution of Development – Settlement Hierarchy S3 – Sustainable Placemaking & High-Quality Design S6 – Infrastructure S10 – Employment Sites Provision S11 – Rural Enterprise S12 – Visitor Economy	
Policy 6 – Town Centre First Significant new commercial, retail, education, health, leisure and public service facilities must be located within town and city centres. They should have good access by public transport to and from the whole town or city and, where appropriate, the wider region. A sequential approach must be used to inform the identification of the best location for these developments and they should be identified in Strategic and Local Development Plans.	RLDP Objectives: Objective 1 – Economic Growth / Employment Objective 2 – Town and Local Centres Objective 11 – Placemaking Objective 12 – Communities Objective 13 Rural Communities Objective 15 – Accessibility RLDP Strategic Policies: S1 – Growth Strategy	In accordance with PPW12 the Deposit Plan sets out the town centre hierarchy for Monmouthshire with a view to sustaining and enhancing the County's main towns as vibrant and attractive centres and to maintain their essential functions as attractive places to live and visit and provide a valuable role in meeting the needs of local communities. The hierarchy assists the implementation of the sequential approach and town centre first principle by directing retail, commercial and social developments, including leisure, cultural and entertainment uses to the appropriate position in the hierarchy. The Monmouthshire Town Centre / Retail Study (2024) which includes an update of retail expenditure forecasts confirms that there will be more limited expenditure growth available to support shop

	S2 – Spatial Distribution of Development – Settlement Hierarchy S3 – Sustainable Placemaking & High-Quality Design S14 – Town, Local and Neighbourhood Centres	floorspace within Monmouthshire centre than previously forecast. In this respect, the RLDP therefore does not make any new retail allocations.
Policy 7 – Delivering Affordable Homes The Welsh Government will increase delivery of affordable homes by ensuring that funding for these homes is effectively allocated and utilised. Through their Strategic and Local Development Plans planning authorities should develop strong evidence based policy frameworks to deliver affordable housing, including setting development plan targets based on regional estimates of housing need and local assessments. In response to local and regional needs, planning authorities should identify sites for affordable housing led developments and explore all opportunities to increase the supply of affordable housing.	RLDP Objectives: Objective 1 – Economic Growth / Employment Objective 6 – Land Objective 9 – Demography Objective 10 – Housing Objective 12 – Communities Objective 13 – Rural Communities Preferred Strategy Strategic Policies: S1 – Growth Strategy S2 – Spatial Distribution of Development – Settlement Hierarchy S7 – Affordable Homes	Tackling affordability issues in Monmouthshire's housing market has been identified as a key challenge to address through the RLDP process and is a key driver behind the Plan's overarching Strategy. Accordingly, the Deposit Plan establishes a policy framework that seeks to address this through an affordable housing target of up to 2,000 affordable homes, establishing affordable housing percentage thresholds within Strategic Policy S7 and requiring 50% affordable housing on new site allocations. Additional opportunities to increase the supply of affordable housing through a housing mix policy and an affordable housing exceptions sites policy have also been incorporated in the Plan. As noted in relation to Policy 3, Monmouthshire County Council recognise the significant role it must play in providing public leadership in achieving this aim as well as the role the RLDP plays. The RLDP sets out the Council's commitment for 50% affordable housing provision on new site allocations. This

	S8 – Site Allocation Placemaking Principles	commitment could have financial implications for the Council of reduced land sale receipts. It may also require Welsh Government policy position changes on use of Social Housing Grant of other public funding. The suggested approaches are supported by Policy 3 of FW which supports public leadership and the use of public land to deliver on ambitious affordable housing targets. The latest Local Housing Market Assessment (LHMA) (May 2024) provides the evidence base on affordable housing matters within the RLDP.
Policy 8 – Flooding Flood risk management that enables and supports sustainable strategic growth and regeneration in National and Regional Growth Areas will be supported. The Welsh Government will work with Flood Risk Management Authorities and developers to plan and invest in new and improved infrastructure, promoting nature-based solutions as a priority. Opportunities for multiple social, economic and environmental benefits must be maximised when investing in flood risk management infrastructure. It must be ensured that projects do not have adverse impacts on international and national statutory designated sites for nature conservation and the features for which they have been designated.	RLDP Objectives: Objective 3- Green Infrastructure, Biodiversity and Landscape Objective 4 – Flood Risk Objective 6 – Land Objective 7 – Natural Resources Objective 17 – Climate and Nature Emergency RLDP Strategic Policies: S4 – Climate Change	The Deposit Plan is underpinned by Objective 4 which seeks to ensure that new development takes account of the risk of flooding, both existing and in the future, including the need to avoid inappropriate development in areas that are at risk from flooding or that may increase the risk of flooding elsewhere and the need to design development, including the use of natural flood management measures to appropriately manage flood risk and surface water run-off. Policy S4 of the Plan makes a policy commitment to avoid locating development in areas at risk of flooding, or where appropriate, minimise the risk of flooding including the incorporation of measures such as Sustainable Drainage Systems and flood resilience design. In accordance with the updated TAN15, a

	S5 – Green Infrastructure, Landscape and Nature Conservation	Strategic Flood Consequence Assessment (SFCA) along with other Planning Authorities in the South-East Wales region, has been undertaken to inform the preparation of the RLDP and the site allocation process. The RLDP also recognises the significant role Green Infrastructure plays in flood attenuation and water resource management and managing and enhancing biodiversity and ecosystems resilience.
Policy 9 – Resilient Ecological Networks and Green Infrastructure To ensure the enhancement of biodiversity, the resilience of ecosystems and the provision of green infrastructure, the Welsh Government will work with key partners to: • identify areas which should be safeguarded and created as ecological networks for their importance for adaptation to climate change, for habitat protection, restoration or creation, to protect species, or which provide key ecosystems services, to ensure they are not unduly compromised by future development; and • identify opportunities where existing and potential green infrastructure could be maximised as part of placemaking, requiring the use of nature-based solutions as a key mechanism for securing sustainable growth, ecological connectivity, social equality and well-being.	RLDP Objectives: Objective 3- Green Infrastructure, Biodiversity and Landscape Objective 4 – Flood Risk Objective 6 – Land Objective 7 – Natural Resources Objective 8 – Health and Well-being Objective 17 – Climate and Nature Emergency RLDP Strategic Policies: S4 – Climate Change	Monmouthshire has significant green infrastructure, landscape, biodiversity and nature conservation resources. The need to protect and enhance theses resources is a key focus of the RLDP, recognising the multifunctional role it has in delivering active travel, placemaking, ecosystem resilience, climate change mitigation and improving general health and well-being. The Council has prepared the Monmouthshire Green Infrastructure Strategy (2019), which has also informed the evidence base of the SE Wales Area Statement. This provides an overarching framework for positive actions by all stakeholders involved in the future protection, management and enhancement of green infrastructure in Monmouthshire and sets out key strategic objectives and priorities for guiding the

Planning authorities should include these areas and/or opportunities in their development plan strategies and policies in order to promote and safeguard the functions and opportunities they provide. In all cases, action towards securing the maintenance and enhancement of biodiversity (to provide a net benefit), the resilience of ecosystems and green infrastructure assets must be demonstrated as part of development proposals through innovative, nature-based approaches to site planning and the design of the built environment.	S5 – Green Infrastructure, Landscape and Nature Conservation S8 – Site Allocation Placemaking Principles	planning management and delivery of green infrastructure in Monmouthshire. Section 5 of the RLDP also sets out the policy requirements relating to ecological resilience and green infrastructure with site specific requirements set out in policy S8 – Site Allocation Placemaking Principles and site-specific requirements set out in policies HA1 – HA18.
Policy 10 – International Connectivity The Welsh Government identifies the following Strategic Gateways to facilitate international connectivity: • Cardiff Airport • Holyhead Port • Haven Waterway, including the Ports of Milford Haven and Pembroke Dock • Fishguard Port The Welsh Government will work with the operators, investors and local authorities to support Strategic Gateways and maintain their international connectivity roles. Strategic and Local Development Plans should support the Strategic Gateways by maximising the benefits they provide to their respective regions and Wales.		There are no Strategic Gateways to facilitate international connectivity identified in the Monmouthshire boundary. The RLDP is therefore considered to have a neutral impact on the achieving the Future Wales policy.

New development around the Strategic Gateways should be carefully managed to ensure their operation is not constrained or compromised.		
Policy 11 – National Connectivity The Welsh Government will support and invest in improving national connectivity. Our priorities are to encourage longer-distance trips to be made by public transport, while also making longer journeys possible by electric vehicles. The Welsh Government will work with Transport for Wales, local authorities, operators and partners to support the delivery of the following measures to improve national connectivity: • Rail Network – Transform the rail network and improve the quality of rail services for passengers. • Bus Network – Invest in the development of the national bus network, fully integrated with regional and local bus networks, to increase modal share of bus travel and improve access by bus to a wider range of trip destinations. • Strategic Road Network – Invest in road improvements to reduce journey times, deliver a safer and more resilient road network, and improve air and noise quality. Create a network of rapid-charging points to enable longer distance travel by electric vehicles throughout Wales. • National Cycle Network – Revitalise the National Cycle Network to create a network of traffic-free	RLDP Objectives: Objective 14 – Infrastructure Objective 15 – Accessibility Objective 17 – Climate and Nature Emergency RLDP Strategic Policies: S4 – Climate Change S6 – Infrastructure Provision S8 – Site Allocation Placemaking Principles S13 – Sustainable Transport	The Deposit Plan seeks to promote sustainable forms of transport, reduce the need to travel, increase provision for walking and cycling and improve public transport provision. The spatial strategy of the RLDP is to focus development in those locations that provide the best opportunities for achieving sustainable development, which offer a choice of transport modes and contribute towards the development of a sustainable transport network and provide opportunities to enhance and connect to the Active Travel Networks. Enhancing the use of ultra-low emission vehicles through the provision of sufficient charging infrastructure is also recognised as a key contributor to improving sustainable national connectivity given Monmouthshire's rural character and is a requirement of Policy S4 – Climate Change. The RLDP promotes the sustainable transport hierarchy and requires new developments to incorporate new links to facilitate movement by non-car methods. However, Monmouthshire is predominantly a rural County and as set out in FW Policy 5, it is recognised that there are significant

paths connecting cities, towns and countryside across Wales. Planning authorities should support developments associated with improvements to national connectivity and, where appropriate, maximise the opportunities that arise from them. Planning authorities must ensure that, where appropriate, new development contributes towards the improvement and development of the National Cycle Network and key links to and from it.		disparities between urban areas with regard to the feasibility of delivering effective public transport systems and active travel routes. Development proposals in rural areas of Monmouthshire should therefore demonstrate innovative solutions to connect rural locations to services and facilities. The RLDP will also seek to facilitate the Monmouthshire specific recommendations of the South East Wales Transport Commission Final Recommendations Plan 2020, which recommends the enhancement of the Severn Tunnel Junction rail station and access arrangements, and development of a walkway station at Magor and Undy. The RLDP has therefore planned for strategic development with Monmouthshire's most sustainable locations that have opportunities and potential to connect and link with regional travel aspirations and plans, in particular identified opportunities at Severn Tunnel Junction and the South East Wales Metro scheme. The identified Strategic Site Allocations of Land to the East of Abergavenny, Mounton Road in Chepstow, Leasbrook in Monmouth and Land to the East of Caldicot will be linked to the town centre and railway stations (where relevant) via active travel connections. Site specific allocation policies have set out key placemaking and active travel requirements.

		An updated Monmouthshire Local Transport Plan taking account of recent key evidence including the South East Wales Transport Commission Final Recommendations Plan: November 2020 and South East Metro has been prepared alongside the preparation of the Deposit Plan. The RLDP supports the transport schemes in identified within the updated LTP, and where appropriate, safeguards land for key transport proposals.
Policy 12 – Regional Connectivity The Welsh Government will support and invest in improving regional connectivity. In urban areas, to support sustainable growth and regeneration, our priorities are improving and integrating active travel and public transport. In rural areas our priorities are supporting the uptake of ultra-low emission vehicles and diversifying and sustaining local bus services. The Welsh Government will work with Transport for Wales, local authorities, operators and partners to deliver the following measures to improve regional connectivity: • Active Travel – Prioritising walking and cycling for all local travel. We will support the implementation of the Active Travel Act to create comprehensive networks of local walking and cycling routes that connect places that people need to get to for everyday purposes.	RLDP Objectives: Objective 14 – Infrastructure Objective 15 – Accessibility Objective 17 – Climate and Nature Emergency RLDP Strategic Policies: S4 – Climate and Nature Emergency S6 – Infrastructure Provision S8 – Site Allocation Placemaking Principles S13 – Sustainable Transport	The Deposit Plan seeks to promote sustainable forms of transport, reduce the need to travel, increase provision for walking and cycling and improve public transport provision. The spatial strategy of the RLDP aims to focus development in those locations that provide the best opportunities for achieving sustainable development, which offer a choice of transport modes and contribute towards the development of a sustainable transport network and provide opportunities to enhance and connect to the Active Travel Networks. Enhancing the use of ultra-low emission vehicles through the provision of sufficient charging infrastructure is also recognised as a key contributor to improving sustainable national connectivity given Monmouthshire's rural character and is a requirement of Policy S4 – Climate Change.

• Bus – Improve the legislative framework for how local bus services are planned and delivered. We will invest in the development of integrated regional and local bus networks to increase modal share of bus travel and improve access by bus to a wider range of trip destinations. • Metros – Develop the South East Metro, South West Metro and North Wales Metro. We will create new integrated transport systems that provide faster, more frequent and joined-up services using trains, buses and light rail. • Ultra-Low Emission Vehicles – Support the roll-out of suitable fuelling infrastructure to facilitate the adoption of ultra-low emission vehicles, particularly in rural areas. Planning authorities must plan the growth and regeneration of the National and Regional Growth Areas to maximise opportunities arising from the investment in public transport, including identifying opportunities for higher density, mixed-use and car-free development around metro stations. Active travel must be an essential and integral component of all new developments, large and small. Planning authorities must integrate site allocations, new development and infrastructure with active travel networks and, where appropriate, ensure new development contributes towards their expansion and improvement.		As noted above the RLDP will also seek to facilitate the Monmouthshire specific recommendations of the 'South East Wales Transport Commission Final Recommendations Plan 2020, which recommends the enhancement of the Severn Tunnel Junction rail station and access arrangements, and development of a walkway station at Magor and Undy. It will also plan for strategic development with Monmouthshire's most sustainable locations that have opportunities and potential to connect and link with reginal travel aspirations and plans, in particular identified opportunities at Severn Tunnel Junction and the South East Wales Metro scheme. The identified Strategic Site Allocations of Land to the East of Abergavenny, Mounton Road in Chepstow, Leasbrook in Monmouth and Land to the East of Caldicot will be linked to the town centre and railway stations (where relevant) via active travel connections. Site specific allocation policies have set out key placemaking and active travel requirements. An updated Monmouthshire Local Transport Plan taking account of recent key evidence including the South East Wales Transport Commission Final Recommendations Plan: November 2020 and South East Metro has been prepared alongside the Deposit Plan. The RLDP supports the transport schemes in identified within the updated LTP, and where

Planning authorities must act to reduce levels of car parking in urban areas, including supporting car-free developments in accessible locations and developments with car parking spaces that allow them to be converted to other uses over time. Where car parking is provided for new non-residential development, planning authorities should seek a minimum of 10% of car parking spaces to have electric vehicle charging points.		appropriate, safeguards land for key transport proposals.
Policy 13 – Supporting Digital Communications The Welsh Government supports the provision of digital communications infrastructure and services across Wales. Planning authorities must engage with digital infrastructure providers to identify the future needs of their area and set out policies in Strategic and Local Development Plans to help deliver this. New developments should include the provision of Gigabit capable broadband infrastructure from the outset.	RLDP Objectives: Objective 14- Infrastructure RLDP Strategic Policies: S6 – Infrastructure Provision	Given Monmouthshire's rural character, the RLDP recognises the importance of ensuring the provision of adequate digital infrastructure to enhancing the County's economic and community connectivity and communication needs and reducing the need to travel.
Policy 14 – Planning in Mobile Action Zones The Welsh Government supports increased mobile phone coverage and the associated economic and social benefits it brings. The Welsh Government will identify Mobile Action Zones, showing locations where there is little or no mobile telecommunications coverage.	RLDP Objectives: Objective 14- Infrastructure RLDP Strategic Policies: S6 – Infrastructure Provision	Future Wales does not identify the Mobile Action Zones at this stage. The RLDP is therefore considered to have a neutral impact on achieving the policy aims. This will be reviewed once the Mobile Action Zones are published.

The Welsh Government, planning authorities and mobile telecommunications operators must work together to achieve increases in mobile coverage within Mobile Action Zones.		
Policy 15 – National Forest The Welsh Government is committed to developing a national forest through the identification of appropriate sites and mechanisms. Action to safeguard proposed locations for the national forest will be supported.	RLDP Objectives: Objective 3- Green Infrastructure, Biodiversity and Landscape Objective 4 – Flood Risk Objective 6 – Land Objective 7 – Natural Resources Objective 8 – Health and Well-being Objective 17 – Climate and Nature Emergency RLDP Strategic Policies: S4 – Climate Change S5 – Green Infrastructure, Landscape and Nature Conservation	Future Wales does not identify the location(s) of the proposed national forest. However, Welsh Government identify 14 National Forest Sites that are part of its estate and managed and maintained by Natural Resources Wales, two of which are within Monmouthshire's boundary – Wentwood Forest and Wye Valley Woodlands. Work is ongoing by Welsh Government to identify additional sites. Policy S5 of the Deposit is supportive of protecting and enhancing Green Infrastructure assets within the County consistent with the aims of Policy 15 of FW.
Policy 16 – Heat Networks	RLDP Objectives: Objective 17 – Climate and Nature Emergency	There are no Priority Areas for District Heat Networks identified within the Monmouthshire boundary within Future Wales. The RLDP does, however, establish the

Within Priority Areas for District Heat Networks planning authorities should identify opportunities for District Heat Networks and plan positively for their implementation. Large scale mixed-use development should, where feasible, have a heat network with a renewable / low carbon or waste heat energy source. Planning applications for such development should prepare an Energy Masterplan to establish whether a heat network is the most effective energy supply option and, for feasible projects, a plan for its implementation.	RLDP Strategic Policies: S4 – Climate Change S8 – Site Allocation Placemaking Principles	policy framework requiring residential developments to be built to net zero carbon standards, including the requirement to not connect to the gas grid and heating to be provided through low carbon heating systems. Similarly, the RLDP supports the development of renewable and low/zero carbon energy generation in principle and has allocated a potential ground mounted solar development. A Renewable and Low Carbon Energy Assessment (RLCEA) of the potential for renewable energy generation, using the Welsh Government Toolkit, has been undertaken and informed the Deposit Plan in terms of its policy approach in relation to local search areas for the potential for types of renewable and low/zero carbon energy and renewable energy targets. The assessment reviews the potential for District Heat Networks in Monmouthshire and concludes that there is very little potential for financially viable traditional heat networks (50 kWh/m2 and greater). This corresponds with the Welsh Government's heat mapping for Future Wales.
Policy 17 – Renewable and Low Carbon Energy and Associated Infrastructure The Welsh Government strongly supports the principle of developing renewable and low carbon energy from all technologies and at all scales to meet our future energy needs.	RLDP Objectives: Objective 17 – Climate and Nature Emergency RLDP Strategic Policies: S4 – Climate Change	There are no Pre-Assessed Areas for Wind Energy within the Monmouthshire boundary within Future Wales. Consistent with Policy 17 of Future Wales the RLDP does, however, establish the policy framework for developing renewable and low carbon energy from all technologies through Strategic Policy S4 – Climate Change and associated detailed policies. An assessment of the potential for renewable energy

In determining planning applications for renewable and low carbon energy development, decision-makers must give significant weight to the need to meet Wales' international commitments and our target to generate 70% of consumed electricity by renewable means by 2030 in order to combat the climate emergency. In Pre-Assessed Areas for Wind Energy the Welsh Government has already modelled the likely impact on the landscape and has found them to be capable of accommodating development in an acceptable way. There is a presumption in favour of large-scale wind energy development (including repowering) in these areas, subject to the criteria in policy 18. Applications for large-scale wind and solar will not be permitted in National Parks and Areas of Outstanding Natural Beauty and all proposals should demonstrate that they will not have an unacceptable adverse impact on the environment. Proposals should describe the net benefits the scheme will bring in terms of social, economic, environmental and cultural improvements to local communities. New strategic grid infrastructure for the transmission and distribution of energy should be designed to minimise visual impact on nearby communities. The Welsh Government will work with stakeholders, including National Grid and Distribution Network Operators, to transition to a multi-vector grid network and reduce the barriers to the implementation of new grid infrastructure.		generation, using the Welsh Government Toolkit, has been undertaken and informed the Deposit Plan's approach to the identification of local search areas for different types of renewable and low/zero carbon energy. Consistent with FW, the Renewable and Low Carbon Energy Assessment (RLCEA) concludes that there is limited wind resource in Monmouthshire. It does, however, identify significant solar resource. However, this resource is reduced significantly when Best and Most Versatile Agricultural Land is excluded, with the remaining 'less constrained' areas being sparse, distinct land parcels distributed throughout the County rather than broad areas. Therefore, given the prevalence of high-quality agricultural land in the County, the RLDP does not allocate Local Search Areas for either wind or solar, it does, however, include a criteria-based policy to determine proposals on a site-by-site basis. The findings of the RLCEA have also been used to inform the RLDP renewable energy generation targets. The Plan also allocates a potential ground mounted solar development.

Policy 18 – Renewable and Low Carbon Energy Developments of National Significance Proposals for renewable and low carbon energy projects (including repowering) qualifying as Developments of National Significance will be permitted subject to policy 17 and the following criteria: 1. outside of the Pre-Assessed Areas for wind developments and everywhere for all other technologies, the proposal does not have an unacceptable adverse impact on the surrounding landscape (particularly on the setting of National Parks and Areas of Outstanding Natural Beauty); 2. there are no unacceptable adverse visual impacts on nearby communities and individual dwellings; 3. there are no adverse effects on the integrity of Internationally designated sites (including National Site Network sites and Ramsar sites) and the features for which they have been designated (unless there are no alternative solutions, Imperative Reasons of Overriding Public Interest (IROPI) and appropriate compensatory measures have been secured); 4. there are no unacceptable adverse impacts on national statutory designated sites for nature conservation (and the features for which they have been designated), protected habitats and species; 5. the proposal includes biodiversity enhancement measures to provide a net benefit for biodiversity;		Policy 18 of Future Wales sets out the criteria Welsh Government will use to assess renewable and low carbon energy developments of national significance. The RLDP is therefore considered to have a neutral impact on its delivery as it is not Monmouthshire's policy framework being used to determine the proposals. As noted above, an assessment of the potential for renewable energy generation, using the Welsh Government Toolkit, has been undertaken and informed the Deposit Plan's approach to the identification of local search areas for different types of renewable and low/zero carbon energy. Consistent with FW, the Renewable and Low Carbon Energy Assessment (RLCEA) concludes that there is limited wind resource in Monmouthshire. It does, however, identify significant solar resource. However, this resource is reduced significantly when Best and Most Versatile Agricultural Land is excluded, with the remaining 'less constrained' areas being sparse, distinct land parcels distributed throughout the County rather than broad areas. Therefore, given the prevalence of high-quality agricultural land in the County, the RLDP does not allocate Local Search Areas for either wind or solar, it does, however, include a criteria-based policy to determine proposals on a site-by-site basis. The findings of the RLCEA have also been used to inform the RLDP renewable energy

6. there are no unacceptable adverse impacts on statutorily protected built heritage assets; 7. there are no unacceptable adverse impacts by way of shadow flicker, noise, reflected light, air quality or electromagnetic disturbance; 8. there are no unacceptable impacts on the operations of defence facilities and operations (including aviation and radar) or the Mid Wales Low Flying Tactical Training Area (TTA-7T); 9. there are no unacceptable adverse impacts on the transport network through the transportation of components or source fuels during its construction and/or ongoing operation; 10. the proposal includes consideration of the materials needed or generated by the development to ensure the sustainable use and management of resources; 11. there are acceptable provisions relating to the decommissioning of the development at the end of its lifetime, including the removal of infrastructure and effective restoration. The cumulative impacts of existing and consented renewable energy schemes should also be considered.		generation targets. The Plan also allocates a potential ground mounted solar development.
Policy 19 – Strategic Policies for Regional Planning Strategic Development Plans should embed placemaking as an overarching principle and should establish for the	RLDP Objectives: Objective 1 – Economic Growth / Employment Objective 5 – Minerals and Waste	A Strategic Development Plan for the South East Wales region is yet to commence. However, the preparation of the RLDP has involved a regional and coordinated approach to the collection of evidence including a Regional Assessment of Future Growth and Migration

region (and where required constituent Local Development Plans): 1. a spatial strategy; 2. a settlement hierarchy; 3. the housing provision and requirement; 4. the gypsy and traveller need; 5. the employment provision; 6. the spatial areas for strategic housing, employment growth and renewable energy; 7. the identification of green belts, green corridors and nationally important landscapes where required; 8. the location of key services, transport and connectivity infrastructure; 9. a framework for the sustainable management of natural resources and cultural assets; 10. ecological networks and opportunities for protecting or enhancing the connectivity of these networks and the provision of green infrastructure; and 11. a co-ordinated framework for minerals extraction and the circular economy, including waste treatment and disposal. The Welsh Government requires the adoption of Strategic Development Plans in the North, Mid Wales, South West and South East regions.	Objective 7 – Natural Resources Objective 10 – Housing Objective 14 – Infrastructure RLDP Strategic Policies: S1 – Growth Strategy S2 – Spatial Distribution of Development – Settlement Hierarchy S6 – Infrastructure Provision S7 – Affordable Housing S8 – Site Allocation Placemaking Principles S9 – Gypsy and Travellers S10 – Employment Sites Provision S13 – Sustainable Transport S16- Minerals S17 – Sustainable Waste Management	for the Cardiff Capital Region (CCR), commissioned on behalf of local authorities in the South East Wales region. Further evidence has been approached with a regionally agreed methodology including population projection modelling, regional employment study, Renewable and Low Carbon Energy Assessment and Integrated Sustainability Assessment and Habitats Regulations Assessment. This has provided a consistent and comparable approach to methodologies and a basis to consider the evidence and any implications on a more regional basis as well as at a local level. Similarly, a number of jointly commissioned pieces of evidence have also informed the RLDP including a Development Viability Model and a Strategic Flood Consequence Assessment. Long standing regional working methods associated with areas such as waste and minerals are continued and reflected in the Plan. This regional approach to many of the policy areas covered in the RLDP will provide a substantial evidence base for the preparation of the South East Wales SDP.

Policy 33 – National Growth Area – Cardiff, Newport and the Valleys Cardiff, Newport and the Valleys will be the main focus for growth and investment in the South East region. Strategic and Local Development Plans should recognise the National Growth Area as the focus for strategic economic and housing growth; essential services and facilities; advanced manufacturing; transport and digital infrastructure. The Welsh Government will work with regional bodies and local authorities in the region and in neighbouring regions of England to promote and enhance Cardiff, Newport and the Valleys' strategic role and ensure key investment decisions support places in the National Growth Area and the wider region. The Welsh Government supports Cardiff's status as an internationally competitive city and a core city on the UK stage. Cardiff will retain and extend its role as the primary national centre for culture, sport, leisure, media, the night time economy and finance. The Welsh Government supports an increased strategic role for Newport as a focus for sustainable, long-term growth and investment. The Welsh Government will work with authorities within the region and in England to promote Newport's strategic role and ensure key investment decisions in Wales and England support Newport.	RLDP Objectives: Objective 1 – Economic Growth / Employment Objective 6 – Land Objective 9 – Demography Objective 10 – Housing Objective 12 – Communities Objective 13 – Rural Communities Preferred Strategy Strategic Policies: S1 – Growth Strategy S2 – Spatial Distribution of Development – Settlement Hierarchy S7 – Affordable Homes S8 – Site Allocation Placemaking Principles S10 – Employment Sites Provision S13 – Sustainable Transport	Monmouthshire is not identified as a growth area in Future Wales, however, the policy supports development in the wider region which addresses the opportunities and challenges arising from the region's geographic location and its functions as a Capital Region. The RLDP growth level has emerged from an understanding of the issues, challenges and needs of Monmouthshire as well as a sound, logical and robust evidence base. The Council has considered how best to progress the RLDP having regard to a number of challenges that have arisen following stakeholder consultation and engagement on the non-statutory stages. In response to the Preferred Strategy (Dec 2022), consultation Welsh Government formally responded with a 'green' rating and noting that *"Future Wales places great emphasis on the development of National Growth Areas and the need for additional affordable housing. The Preferred Strategy is in general conformity with Policies 1, 7 and 33 of Future Wales and does not undermine the role of Cardiff, Newport and the Valleys as the main focus for growth and investment in the south east region, but reflects the urgent need to increase the supply of affordable housing in Monmouthshire."* In this respect the overarching strategy of the Deposit Plan has been accepted as being in conformity with Future Wales by Welsh Government.

The Welsh Government supports co-ordinated regeneration and investment in the Valleys area to improve well-being, increase prosperity and address social inequalities. The Welsh Government will work with regional bodies, local authorities, businesses, the third sector, agencies and stakeholders to support investment, including in the manufacturing sector, and to ensure a regional approach is taken to addressing socio-economic issues in the Valleys. The Welsh Government supports development in the wider region which addresses the opportunities and challenges arising from the region's geographic location and its functions as a Capital Region.		Although Monmouthshire is not within the national growth area identified in Future Wales 2040: The National Plan, our evidence shows that the proposed level of growth is essential to deliver our local evidence-based issues and objectives and to ensure the RLDP is 'sound'. It is supported by policies 3, 4, 5 and 7, which support public leadership and the use of public land to deliver on ambitious affordable housing targets, demographically balanced rural communities, the rural economy and the delivery of affordable homes. The background evidence to the RLDP shows that the proposed level of growth is essential to deliver our local evidence-based issues and objectives and ensure the RLDP is 'sound' in respect of all tests of soundness. The RLDP growth strategy will assist in addressing our core issues without harming or compromising Welsh Government's objectives for the wider South Wales region. The RLDP seeks to build on Monmouthshire's key strategic location that benefits from good links to Cardiff, Bristol and the Midlands. The RLDP recognises that given Monmouthshire position as the gateway to Wales combined with the wider opportunities associate with the Cardiff Capital Region City Deal, South East Wales Metro and the County's strategic location between the Great Western Cities of Cardiff,

		Newport and Bristol, the County has potential to contribute to the aims for the wider region.
Policy 34 – Green Belts in the South East The Welsh Government requires the Strategic Development Plan to identify a green belt to the north of Cardiff, Newport and the eastern part of the region to manage urban form and growth. The Strategic Development Plan must consider the relationship of the green belts with the green belt in the West of England. Local Development Plans and development management decisions should not permit major development in the areas shown for consideration for green belts, except in very exceptional circumstances, until the need for green belts and their boundaries has been established by an adopted Strategic Development Plan.	RLDP Objectives: Objective 3 – Green Infrastructure, Biodiversity and Landscape Objective 6 – Land RDLP Strategic Policies: S2 – Spatial Distribution of Development – Settlement Hierarchy S5 – Green Infrastructure, Landscape and Nature Conservation S8 – Site Allocation Placemaking Principles	The South East Wales Regional Strategic Diagram (page 163 of Future Wales) provides an indicative plan of the area for consideration with the detailed boundary to be defined through the preparation of the SDP. In advance of an SDP, the area shown for consideration in Future Wales should be treated as a designated Green Belt. In assessing the spatial strategy for distributing growth within the County consideration has been given to PPW12 which states that "when considering a Green Belt designation, a sufficient range of development land which is suitably located in relation to the existing urban edge should be made available, having regard to the longer term need for development land, the effects of development pressures in areas beyond the Green Belt and the need to minimise demand for travel. This may require land to be safeguarded, and boundaries of proposed Green Belts must be carefully defined to achieve this". In this respect, the RLDP is considered to facilitate the identification of a green belt in southern Monmouthshire with the primary settlements situated outside the broad designation, consistent with the indicative plan and meeting the aims of Policy 34 but allowing for an appropriate level of growth in Monmouthshire to address its local challenges and

		issues. The Council still has significant concerns, however, regarding the Green Belt designation as a permanent designation that would have long-term policy implications for future growth and prosperity in Monmouthshire.
Policy 35 – Valleys Regional Park The Welsh Government supports the establishment of the Valleys Regional Park. Strategic and Local Development Plans should embed its principles into their planning frameworks. The Welsh Government will work with local authorities, the third sector and key partners to support the Valleys Regional Park and maximise opportunities for new development.		Policy 35 – Valleys Regional Park is not considered to be directly related to Monmouthshire. The RLDP is therefore considered to have a neutral impact of achieving its aims.
Policy 36 – South East Metro The Welsh Government supports the development of the South East Metro and will work with Transport for Wales, local authorities and other partners to enable its delivery and maximise associated opportunities. Strategic and Local Development Plans must support the South East Metro. Planning authorities should plan growth and regeneration to maximise the opportunities arising from better regional connectivity, including identifying opportunities for higher density, mixed-use and car-free development around new and improved metro stations.	RLDP Objectives: Objective 14 – Infrastructure Objective 15 – Accessibility Objective 17 – Climate and Nature Emergency RLDP Strategic Policies: S4 – Climate Change S6 – Infrastructure Provision S13 – Sustainable Transport	Preferred Strategy Policy S13 – Sustainable Transport, sets out the policy framework to promote sustainable travel in the County with specific reference to developing the role of Monmouthshire's Primary settlements in accordance with the South East Wales Regional Plan and Monmouthshire's Local Transport Plan around which low carbon sustainable transport opportunities can be developed and linked to the South East Wales Metro. The RLDP identifies site alocations within Monmouthshire's most sustainable locations that have opportunities and potential to connect and link with regional travel aspirations, in particular identified opportunities at Severn Tunnel Junction and the South East Wales Metro Scheme.

		An updated Monmouthshire Local Transport Plan taking account of recent key evidence including the South East Wales Transport Commission Final Recommendations Plan: November 2020 and South East Metro has been prepared alongside the RLDP. The Plan supports the transport schemes identified within the updated LTP, and where appropriate, safeguards land for key transport proposals.

Conclusion

3.5. As the assessment above demonstrates, the RLDP aligns with the objectives of Future Wales and establishes a policy framework that is in general conformity with Future Wales and makes a positive contribution to its policy aims. At a local and regional level, the RLDP is well-placed to implement the vision and objectives of Future Wales by ensuring that it includes policies that adhere to principles of placemaking and sustainable development.

3.6. Future Wales includes policy provisions for issues at a national level such as International Connectivity and Renewable and Low Carbon Energy Developments of National Significance. These are shown in yellow above, to indicate that the RLDP makes a neutral contribution to these areas. Similarly, a neutral affect is indicated for policies areas where locations are yet to be published such as Planning Mobile Action Zones and Policy 35 relating to the Valleys Regional Park which is not directly relevant to Monmouthshire. Whilst the RLDP does not directly include provisions for these issues, they are not considered to have a material impact on the ability of the RLDP to align with the over-arching vision and objectives of Future Wales.

APPENDIX 9: Equality and Future Generations Evaluation

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Equality and Future Generations Evaluation

Name of the Officer completing the evaluation Criag O'Connor **Phone no:** 07816175737 **E-mail:** craigoconnor@monmouthshire.gov.uk	**Please give a brief description of the aims of the proposal** To seek Council's endorsement of the Deposit Replacement Local Development Plan (RLDP) to commence statutory consultation/engagement with communities and key stakeholders, and to seek Council's agreement of the revised RLDP Delivery Agreement for submission to Welsh Government for approval.
Name of Service area Planning (Planning Policy)	**Date 08/10/2024**

Are your proposals going to affect any people or groups of people with protected characteristics? Please explain the impact, the evidence you have used and any action you are taking below.

Protected Characteristics	Describe any positive impacts your proposal has on the protected characteristic	Describe any negative impacts your proposal has on the protected characteristic	What has been/will be done to mitigate any negative impacts or better contribute to positive impacts?
Age	The Deposit RLDP aims to have a positive impact on people of all ages, particularly through increasing opportunities for the younger population to both live and work within Monmouthshire to assist in ensuring a balanced demography whilst also supporting the needs of the older population socially, economically and by ensuring an appropriate housing mix to meet different needs. This would benefit younger people but not to the detriment of older age groups.	None	The Deposit Plan seeks to provide a more balanced demographic profile for Monmouthshire. It progresses the evidence gathering, stakeholder engagement and Pre-Deposit work undertaken to date, and sets out the strategy, proposals and detailed policies for the future use and development of land in Monmouthshire (excluding the area within the Bannau Brycheiniog National Park (BBNP)) over the period 2018-2033. The Plan identifies how much sustainable growth is needed and where this growth will located. Placemaking is embedded throughout the Plan, including detailed placemaking, design and site allocation policies, ensuring that exemplar places are created that are safe, accessible and pleasant for all.

Protected Characteristics	Describe any positive impacts your proposal has on the protected characteristic	Describe any negative impacts your proposal has on the protected characteristic	What has been/will be done to mitigate any negative impacts or better contribute to positive impacts?
Disability	The Deposit RLDP recognises the need to ensure the provision of a wide-ranging choice of homes including meeting affordable and accessible housing needs as far as possible. It also recognises the importance of the health and well-being of people and aims to create attractive, safe and accessible places to live, work and visit.	None	The Deposit Plan aims to support the well-being of current and future generations that are more inclusive, cohesive, prosperous and vibrant. It sets out the strategy, proposals and detailed policies for the future use and development of land in Monmouthshire (excluding the area within the BBNP) over the period 2018-2033, identifying how much sustainable growth is needed and where this growth will be located. Placemaking is embedded throughout the Plan, including detailed placemaking, design and site allocation policies, ensuring that exemplar places are created that are safe, accessible and pleasant for alll.
Gender reassignment	None.	None.	Placemaking is embedded throughout the Plan, including detailed placemaking, design and site allocation policies, ensuring that exemplar places are created that are safe, accessible and pleasant for all.

Protected Characteristics	Describe any positive impacts your proposal has on the protected characteristic	Describe any negative impacts your proposal has on the protected characteristic	What has been/will be done to mitigate any negative impacts or better contribute to positive impacts?
Marriage or civil partnership	None.	None.	N/A
Pregnancy or maternity	None.	None.	Placemaking is embedded throughout the Plan, including detailed placemaking, design and site allocation policies, ensuring that exemplar places are created that are safe, accessible and pleasant for all.
Race	.None.	None.	Placemaking is embedded throughout the Plan, including detailed placemaking, design and site allocation policies, ensuring that exemplar places are created that are safe, accessible and pleasant for all.
Religion or Belief	None.	None.	Placemaking is embedded throughout the Plan, including detailed placemaking, design and site allocation policies, ensuring that exemplar places are created that are safe, accessible and pleasant for all.

Protected Characteristics	Describe any positive impacts your proposal has on the protected characteristic	Describe any negative impacts your proposal has on the protected characteristic	What has been/will be done to mitigate any negative impacts or better contribute to positive impacts?
Sex	One of the challenges facing the County is the imbalance between male and female earnings, although this situation is improving. The Deposit RLDP aims to provide economic growth and employment provision, which could indirectly impact on wage equality and therefore access to housing and quality of life.	The jobs in the foundation economy are disproportionately occupied by females. This sector is vital to support our communities, as are jobs in tourism. Neither sectors are generally well-paid, although they often offer flexible working conditions that can assist work-life balance. Wage levels are not within the remit of planning policy and policies to try to seek only high paid jobs could be to the detriment of this vital economic sector.	The Deposit Plan aims to support economic growth and prosperity. It sets out the strategy, proposals and detailed policies for the future use and development of land in Monmouthshire (excluding the area within the BBNP) over the period 2018-2033, identifying how much sustainable growth is needed and where this growth will be located. Other policy tools beyond the RLDP are available to the Council could assist with securing well-paid employment opportunities within the County. Placemaking is embedded throughout the Plan, including detailed placemaking, design and site allocation policies, ensuring that exemplar places are created that are safe, accessible and pleasant for all.
Sexual Orientation	None.	None.	Placemaking is embedded throughout the Plan, including detailed placemaking, design and site allocation policies, ensuring that exemplar places are created that are safe, accessible and pleasant for all.

2. The Socio-economic Duty and Social Justice

The Socio-economic Duty requires public bodies to have due regard to the need to reduce inequalities of outcome which result from socio-economic disadvantage when taking key decisions This duty aligns with our commitment as an authority to Social Justice.

	Describe any positive impacts your proposal has in respect of people suffering socio economic disadvantage	**Describe any negative impacts your proposal has in respect of people suffering socio economic disadvantage.**	**What has been/will be done to mitigate any negative impacts or better contribute to positive impacts?**

Socio-economic Duty and Social Justice	The Social Justice strategy focuses on three main areas: tackling loneliness and isolation; tackling poverty and promoting equitable economic prosperity; and giving children the best start in life. The Deposit RLDP seeks to tackle house price unaffordability, which currently prevents some of our communities accessing suitable housing within the County, by maximising affordable housing delivery on new housing allocations, reflecting the Council's commitment to deliver 50% affordable homes on new housing sites. This is likely to benefit younger people in particular, which in turn will make our ageing communities more socially sustainable. Good quality and affordable housing is important in achieving poverty reduction and equitable prosperity, and supporting the best start in life. Good spatial planning helps to build cohesive communities. The provision of affordable housing combined with policy interventions in relation to the requirement of a mix of market housing will increase opportunities for those in poverty to access	People in poverty or on low incomes might not be able to access digital opportunities to work from home and/or are more likely to be employed in roles that cannot work from home.	The Deposit Plan sets out the planning policy framework to assist in addressing these key issues. It sets out our commitment to maximising the provision of affordable homes on new housing allocations and to deliver net zero carbon new homes. The Deposit Plan also includes: • A housing mix policy to control the housing mix of the market housing on development sites, which will assist in creating mixed communities and support the retention of younger people who can afford an open market home were there sufficient supply of 2 and 3 bedroom homes. • Residential allocations in some of our most sustainable rural settlements to delivery 50% affordable homes. • Climate change policies to minimise the carbon footprint of new development, and therefore mitigate negative impacts associated with the proposed growth. • Nature recovery policies to protect and enhance Monmouthshire's landscapes and biodiversity to help address the climate and nature emergency. • A policy requirement for broadband infrastructure provision in new residential developments will maximise opportunities for all to access the

			technology to work from home where possible, reducing commuting and associated costs.

3. Policy making and the Welsh language.

How does your proposal impact on the following aspects of the Council's Welsh Language Standards:	Describe the positive impacts of this proposal	Describe the negative impacts of this proposal	What has been/will be done to mitigate any negative impacts or better contribute to positive impacts
Policy Making Effects on the use of the Welsh language, Promoting Welsh language Treating the Welsh language no less favourably	The Welsh language is a material planning consideration and is included within the RLDP Objective relating to Culture, Heritage and Welsh Language to ensure there is no negative impact. Any level of growth for the County relies on in-migration, some of which, whether English or Welsh or other nationality, will choose Welsh Medium education for their children. Also in-migration to Monmouthshire comes from other areas in Wales (including rural Welsh speaking areas e.g. Pembrokeshire, Ceredigion, Gwynedd, Ynys Môn, Denbighshire). This is in the main due to the significantly increased employment opportunities offered in Cardiff, Newport and in adjacent areas of England e.g. Bristol, Gloucester etc. Monmouthshire with its border location and transport links is accessible to all of these areas. This in-migration, together with the ambition to retain and attract younger families, will expose more children to Welsh curriculum education in all schools, increasing the number of Welsh speakers in the County. The RLDP is subject to a Welsh Language Impact Assessment (WLIA) as part of the	Any level of growth for the County relies on in-migration, being a border County a proportion of this is likely to be from England.	The Deposit Plan aims to support culture and the Welsh language. We will continue to liaise with the Local Education Authority to understand if the proposed growth and spatial strategy necessitates additional Welsh medium school provision. There are already significant plans and proposals in place in terms of expanding Welsh Medium education in Monmouthshire. This is due to a number of factors: - the increased popularity of the Welsh Language. - the opportunity for children to be become bilingual - the increased employment opportunities that this affords them in Wales.

	wider Integrated Sustainability Appraisal (ISA).		
Operational Recruitment & Training of workforce	An expansion of the provision of Welsh Medium education in the County will increase the opportunities for Welsh speakers to apply for vacancies within the Council thus increasing the Council's Welsh speaking capacity.	None of the current Planning Policy Team are fluent Welsh speakers, however, there are robust systems in place to deal with phone calls and correspondence without delaying the provision of the service.	N/A
Service delivery Use of Welsh language in service delivery Promoting use of the language	All statutory documentation on the RLDP and associated consultation along with notices, social media and general correspondence will be bilingual. A document will be in English only if it comes from an external source that is not subject to compliance with the Welsh Language (Wales) Measure 2011**.** Emails/letters etc will make it clear that correspondence in Welsh is welcome and will not lead to a delay in response or a lesser standard of service . When requests are made for people to be added to the RLDP consultation database we will record language choice and communicate accordingly.	None of the Planning Policy team are Welsh speakers, however, there are robust systems in place to deal with phone calls and correspondence without delaying the provision of the service.	The Welsh language is a material planning consideration and is included within the RLDP Objective relating to Culture, Heritage and Welsh Language to ensure there is no negative impact. The Deposit Plan is subject to a Welsh Language Impact Assessment (WLIA) as part of the wider Integrated Sustainability Appraisal (ISA). We will review this further if any additional assessment is required as we go through the RLDP process.

4. Does your proposal deliver any of the well-being goals below? Please explain the impact (positive and negative) you expect, together with suggestions of how to mitigate negative impacts or better contribute to the goal. There's no need to put something in every box if it is not relevant!

Well Being Goal	Does the proposal contribute to this goal? Describe the positive and negative impacts.	What actions have been/will be taken to mitigate any negative impacts or better contribute to positive impacts?
A prosperous Wales Efficient use of resources, skilled, educated people, generates wealth, provides jobs	**Positive**: The Deposit Plan identifies the level of growth over the RLDP period and spatial distribution of this growth, including proposed site allocations for residential and employment uses, together with the detailed planning policy framework. As well as housing growth, the RLDP aims to provide economic growth and employment provision in both urban and rural areas. **Negative:** Careful site selection has sought to minimise loss of best and most versatile agricultural land and mineral resource.	The Deposit Plan includes RLDP Objectives relating to economic growth/employment and town/local centres, which have been set in order to address the identified issues relating to creating a prosperous Wales.
A resilient Wales Maintain and enhance biodiversity and ecosystems that support resilience and can adapt to change (e.g. climate change)	**Positive:** The Deposit Plan incorporates RLDP Objectives including the impact of development on the natural environment in already constrained areas. It is, however, recognised that developments could improve connectivity through opportunities to create new linkages. The limited supply of brownfield land within the County is a recognised issue. The Deposit Plan recognises that we are in a climate and nature emergency by including a specific climate and nature emergency objective. It sets out a commitment to delivering net zero carbon homes. Resilience of new development to aspects of climate change can be achieved via the design and location of new developments. All developments can provide	The Deposit Plan includes RLDP Objectives relating to Green Infrastructure, Biodiversity and Landscape, Flood Risk, Minerals and Waste, Land and Natural Resources which have been set in order to address the identified issues relating to creating a resilient Wales. There are water quality issues in the River Usk and River Wye SACs. There is a legal and national policy requirement to maintain and enhance ecology.

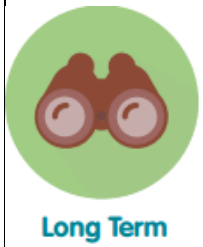
Well Being Goal	Does the proposal contribute to this goal? Describe the positive and negative impacts.	What actions have been/will be taken to mitigate any negative impacts or better contribute to positive impacts?
	opportunities to minimise carbon by providing opportunities for renewable energy generation, seeking to reduce commuting, supporting the use of ultra-low emission vehicles and public transport, and the provision of quality Green Infrastructure. The Plan sets out policies to protect and enhance Monmouthshire's special and unique spaces, heritage assets, landscapes and biodiversity. **Negative:** Additional growth would likely result in further pressure on the natural environment. New developments can nevertheless improve Green Infrastructure and ecological connectivity through opportunities to create new linkages. The Plan sets out policies to protect and enhance Monmouthshire's special and unique spaces, heritage assets, landscapes and biodiversity.	
A healthier Wales People's physical and mental wellbeing is maximized and health impacts are understood	**Positive:** The Deposit Plan identifies the level of growth over the RLDP period and spatial distribution of this growth, including proposed site allocations for residential and employment uses, together with the detailed planning policy framework. It is recognised that any developments will be encouraged to support healthier lifestyles and provide sufficient open space. The RLDP will encourage Active Travel and will reflect the Integrated Network Maps. The need for affordable housing, both in terms of purchase/rent and living costs, is being exacerbated	The Deposit Plan includes RLDP Objectives relating to Health and Well-being in order to address the identified issues relating to creating a healthier Wales.

Well Being Goal	Does the proposal contribute to this goal? Describe the positive and negative impacts.	What actions have been/will be taken to mitigate any negative impacts or better contribute to positive impacts?
	by the current cost of living crisis. The RLDP seeks to maximise affordable housing through delivery of 50% affordable homes on all new site allocations and provision of net zero carbon homes. **Negative:** Additional growth has the potential to increase commuting which could affect areas with air quality problems, however, the RLDP seeks to provide for jobs within the County.	
A Wales of cohesive communities Communities are attractive, viable, safe and well connected	**Positive:** The Deposit Plan identifies the level of growth over the RLDP period and spatial distribution of this growth, including proposed site allocations for residential and employment uses, together with the detailed planning policy framework. It also considers the balance of housing, employment and infrastructure in both urban and rural areas. **Negative:** None	The Deposit Plan has been assessed against the RLDP Objectives including housing, place-making, communities, rural communities, infrastructure and accessibility in order to address the identified issues relating to creating a Wales of cohesive communities. Placemaking is embedded throughout the Plan, including detailed placemaking, design and site allocation policies, ensuring that exemplar places are created that are safe, accessible and pleasant for all.
A globally responsible Wales Taking account of impact on global well-being when considering local social, economic and environmental wellbeing	**Positive:** The Deposit Plan identifies the level of growth over the RLDP period and spatial distribution of this growth, including proposed site allocations for residential and employment uses, together with the detailed planning policy framework. It includes a specific climate and nature emergency objective. This recognises that we are in a climate emergency and has committed to strive to limit the increase in	The Deposit Plan includes a specific climate and nature emergency objective which has been set in order to address the identified issues relating to creating a globally responsible Wales. Climate change considerations inform the RLDP's planning policy framework including policies, proposals and land use allocations.

Well Being Goal	Does the proposal contribute to this goal? Describe the positive and negative impacts.	What actions have been/will be taken to mitigate any negative impacts or better contribute to positive impacts?
	global temperatures to 1.5ºC. The Deposit Plan sets out a commitment to delivering net zero carbon new homes reflecting our commitment to respond to the climate emergency. In addition, the recent pandemic has demonstrated that a significant proportion of our communities can work from home which is likely to continue over the longer term. The RLDP seeks to reduce the commuting ratio and to enable home-working, reflective of recent trends. The Plan also includes a specific policies relating to climate change and nature recovery. **Negative:** None.	Section 6 of the Environment Act already requires biodiversity enhancement, which will help address the emergency. This is reflected in the RLDP policy framework.
A Wales of vibrant culture and thriving Welsh language Culture, heritage and Welsh language are promoted and protected. People are encouraged to do sport, art and recreation	**Positive:** The Deposit Plan identifies the level of growth over the RLDP period and spatial distribution of this growth, including proposed site allocations for residential and employment uses, together with the detailed planning policy framework. The RLDP includes an objective relating to Culture, Heritage and the Welsh language. **Negative:** Any level of growth for the County relies on in-migration, being a border County a proportion of this is likely to be from England.	The Deposit Plan includes an objective relating to Culture, Heritage and the Welsh language which has been set in order to address the identified issues relating to creating a Wales of vibrant culture and thriving Welsh Language. We will continue to liaise with the Local Education Authority to understand if the proposed growth necessitates additional Welsh medium school provision.
A more equal Wales People can fulfil their potential no matter what their background or circumstances	**Positive:** The Preferred Strategy identifies the level of growth over the RLDP period and spatial distribution of this growth, including proposed site allocations for residential and employment uses, together with the detailed planning policy framework.	The Deposit Plan includes an objective relating to demography which has been set in order to address the identified issues relating to creating a more equal Wales. It seeks to take action to enable younger people who are currently priced-out of the

Well Being Goal	Does the proposal contribute to this goal? Describe the positive and negative impacts.	What actions have been/will be taken to mitigate any negative impacts or better contribute to positive impacts?
	Housing and economic growth in both urban and rural areas will assist in balancing the demography across the County and in addressing the County's affordability challenges. The RLDP aims to address the higher proportion of older age groups and lower proportion of young adults compared to the Welsh average. One of the key objectives of the RLDP is to deliver much needed affordable housing, having a safe secure and suitable home gives people the best start in life. **Negative:** None.	County an opportunity to remain living here by striving to maximise affordable housing delivery to help tackle this. It also seeks to provide additional jobs.

5. How has your proposal embedded and prioritised the sustainable governance principles in its development?

Sustainable Development Principle	Does your proposal demonstrate you have met this principle? If yes, describe how. If not explain why.	Are there any additional actions to be taken to mitigate any negative impacts or better contribute to positive impacts?
 Balancing short term need with long term and planning for the future	The Deposit Plan sets out the level of growth for housing/employment and the spatial distribution of this growth across the County, including proposed site allocations for residential and employment uses, together with the detailed planning policy framework. It also sets out the RLDP vision, the role of which is to clarify the core purpose of the RLDP and provides the framework for the Plan's strategy and policies. The Vision sets the overarching context for Monmouthshire for the period up to 2033.	A total of 17 RLDP Objectives are included in the Deposit Plan in order to address the issues, challenges, and opportunities facing the County.

Sustainable Development Principle	Does your proposal demonstrate you have met this principle? If yes, describe how. If not explain why.	Are there any additional actions to be taken to mitigate any negative impacts or better contribute to positive impacts?
Working together with other partners to deliver objectives	The Deposit Plan has been informed by a range of evidence. We have engaged with consultees at key stages from the outset of the RLDP process to build consensus including on the issues, vision and objectives, the growth and spatial options and Preferred Strategy. Plan preparation and engagement has also included: collaborative working with neighbouring local authorities; Member involvement; discussions with key stakeholders including internal departments and external organisations, including key infrastructure providers. We engaged/consulted on the Preferred Strategy including through methods listed above, two virtual events for members of the public, a virtual event for Town and Community Councils and eight in person drop-in sessions at various settments across the County. The responses received to this engagement/consultation have shaped the Deposit Plan. Further enegagment will take place during the consultation on the Deposit Plan, including via the methods listed above. We will continue to seek to engage with seldom heard groups in particular young people, via the Youth Council, and Gypsy and Travellers via the GTAA work.	The RLDP Delivery Agreement ensures full stakeholder /community's involvement to shape the RLDP. We engaged/consulted on the Preferred Strategy including through methods listed above, two virtual events for members of the public, a virtual event for Town and Community Councils and eight in person drop-in sessions at various settments across the County. The responses received to this engagement/consultation have shaped the Deposit Plan. Further enegagment will take place during the Deposit Plan consultation.

Sustainable Development Principle	Does your proposal demonstrate you have met this principle? If yes, describe how. If not explain why.	Are there any additional actions to be taken to mitigate any negative impacts or better contribute to positive impacts?
Involving those with an interest and seeking their views	The Deposit Plan has been informed by a range of evidence. We have engaged with consultees at key stages from the outset of the RLDP process to build consensus including on the issues, vision and objectives, the growth and spatial options and Preferred Strategy. Plan preparation and engagement has also included: collaborative working with neighbouring local authorities; Member involvement; discussions with key stakeholders including internal departments and external organisations including key infrastructure providers. The RLDP Delivery Agreement Community Involvement Scheme sets out the way in which the Council proposes to involve the local community and other stakeholders in the preparation of the RLDP. We will continue to engage with Cabinet Member for Equalities and Engagement to discuss how this area can be strengthened.	The revised Delivery Agreement ensures full stakeholder /community's involvement to shape the RLDP. We engaged/consulted on the Preferred Strategy including through methods listed above, two virtual events for members of the public, a virtual event for Town and Community Councils and eight in person drop-in sessions at various settments across the County. The responses received to this engagement/consultation have shaped the Deposit Plan. Further enegagment will take place during the Deposit Plan consultation.

Sustainable Development Principle	Does your proposal demonstrate you have met this principle? If yes, describe how. If not explain why.	Are there any additional actions to be taken to mitigate any negative impacts or better contribute to positive impacts?
Putting resources into preventing problems occurring or getting worse	The Deposit RLDP sets out the level of growth for housing/employment and the spatial distribution of this growth across the County to address the core issues of delivering much needed affordable housing at pace and scale, responding to the climate and nature emergency by delivering net zero carbon new homes in exemplar places, supporting economic prosperity, and sustaining and ensuring our communities are socially and economically sustainable by attracting and retaining younger people to rebalance our ageing demographic.	The Deposit Plan seeks to address our key issues/challenges/opportunities (in a land use context) and support delivery of the Council's vision for the future of the County and its communities. The RLDP Delivery Agreement seeks to ensure that the Plan will be delivered in accordance with the project timetable and ensures full stakeholder /community involvement to shape the RLDP. A revised Delivery Agreement which amends the project timetable for Plan preparation, will be reported to Council in October 2024 alongside the Deposit RLDP.

Sustainable Development Principle	Does your proposal demonstrate you have met this principle? If yes, describe how. If not explain why.	Are there any additional actions to be taken to mitigate any negative impacts or better contribute to positive impacts?
Considering impact on all wellbeing goals together and on other bodies	The Deposit RLDP sets out the level of growth for housing/employment and the spatial distribution of this growth across the County, including proposed site allocations, together with the detailed planning policy framework. It seeks to address the issues/challenges/opportunities identified (in a land use context) and support delivery of the Council's vision/objectives for the future of the County and its communities. The Deposit Plan is subject to an Integrated Sustainability Appraisal (ISA) including Strategic Environmental Assessment (SEA), Well-being of Future Generations Assessment (WBFG), Health Impact Assessment (HIA), Equality Impact Assessment (EqIA), and Welsh Language Impact Assessment (WLIA)), whose findings have been used to inform the development of the RLDP strategy, policies and site allocations in order to ensure that the Plan will be promoting sustainable development. The Deposit Plan also sets out the Vision which will set the overarching context for Monmouthshire for the period up to 2033. MCC recognises that we are in a climate emergency and nature emergency and has committed addressing these. The RLDP will have a key role in addressing these issues.	The Deposit Plan is subject to an Integrated Sustainability Appraisal (ISA) including Strategic Environmental Assessment (SEA), Well-being of Future Generations Assessment (WBFG), Health Impact Assessment (HIA), Equality Impact Assessment (EqIA), and Welsh Language Impact Assessment (WLIA)), whose findings have been used to inform the development of the RLDP strategy, policies and site allocations in order to ensure that the Plan will be promoting sustainable development. We will continue to work closely with our neighbours, both in Wales and England, including the joint procurement of evidence as applicable. The RLDP will align with the new Integrated Network Maps for Active Travel, and the Deposit Plan will be accompanied by an Infrastructure Plan, Local Transport Strategy and Economy, Employment and Skills Strategy. The ISA is an iterative process throughout the Plan process. This will ensure the Plan is promoting sustainable development.

6. **Council has agreed the need to consider the impact its decisions has on the following important responsibilities: Corporate Parenting and Safeguarding. Are your proposals going to affect any of these responsibilities?**

	Describe any positive impacts your proposal has	**Describe any negative impacts your proposal has**	**What will you do/ have you done to mitigate any negative impacts or better contribute to positive impacts?**
Safeguarding	None.	None.	N/A
Corporate Parenting	The RLDP will provide affordable homes, the delivery and allocation of which should be cognisant of the needs of children leaving care.	None.	N/A

7. **What evidence and data has informed the development of your proposal?**

A range of evidence and data has been used to inform the Deposit RLDP, from a wide range of sources both internal and external to the Council, including:

- Initial Consultation Report (October 2024)
- Housing Background Paper (October 2024)
- Issues, Vision and Objectives Paper (Updated September 2024)
- Monmouthshire Local Development Plan Annual Monitoring Reports (2014- 2023)
- Integrated Sustainability Appraisal Report (AECOM, September 2024)
- HRA of the Monmouthshire Deposit RLDP (AECOM, September 2024)
- RLDP revised Delivery Agreement (October 2024)
- Candidate Site Assessment Report (October 2024)
- Candidate Sites High Level Assessment (August 2022)
- Monmouthshire RLDP Candidate Sites Register (updated July 2023)
- Local Housing Market Assessment Updated 2022-2037

External sources of data include Welsh Government, Cadw, Natural Resources Wales, Hometrack, Office for National Statistics and Stats Wales.

- *Equalities dashboard link*. Equality data dashboard for EQIA's 2020.xlsx

8. **SUMMARY: As a result of completing this form, what are the main positive and negative impacts of your proposal, how have they informed/changed the development of the proposal so far and what will you be doing in future?**

Positive - The Deposit RLDP sets out the level of growth for housing/employment and the spatial distribution of this growth, including proposed site allocations, together with the detailed planning policy framework to address the core issues of delivering much needed affordable homes, responding to the climate and nature emergency by delivering net zero carbon new homes in exemplar places, supporting economic prosperity, and ensuring our communities are socially and economically sustainable by attracting and retaining younger people to rebalance our ageing demographic. This is a positive impact for social justice. **Negative –** People in poverty or on low incomes might not be able to access digital opportunities to work from home and/or are more likely to be employed in roles that cannot work from home. There are no negative implications for corporate parenting or safeguarding.

9. ACTIONS: As a result of completing this form are there any further actions you will be undertaking? Please detail them below, if applicable.

What are you going to do	When are you going to do it?	Who is responsible
Seek Council's endorsement of the Deposit RLDP to commence statutory consultation/engagement with communities and key stakeholders. Seek Council's agreement of the revised Delivery Agreement for submission to Welsh Government for approval.	Council 24th October 2024.	Head of Placemaking Planning Policy Team

10. VERSION CONTROL: The Equality and Future Generations Evaluation should be used at the earliest stage, such as informally within your service, and then further developed throughout the decision making process. It is important to keep a record of this process to demonstrate how you have considered and built in equality and future generations considerations wherever possible.

Version No.	Decision making stage	Date considered	Brief description of any amendments made following consideration
0.0	LDP Review Report and Delivery Agreement	20/04/2018	Draft for Council 10th May 2018
1.0	Issues, Vision and Objectives scrutiny	01/02/2019	Draft for Economy & Development Select Committee 14th February 2019
1.1	Issues, Vision and Objectives endorsement following consultation	09/04/2019	Draft for Cabinet 5th June 2019
1.2	Issues, Vision and Objectives endorsement following consultation	14/06/2019	Amended for Cabinet 3rd July 2019 to reflect 16th May 2019's Climate Emergency declaration by Council
2.0	Growth and Spatial Options endorsement to consult	07/06/2019	Draft for Cabinet 3rd July 2019
2.1	Growth and Spatial Options scrutiny	09/07/2019	Draft for Economy & Development Select Committee 17th July 2019
3.0	Preferred Strategy endorsement to consult	11/12/2019	Draft for Council report 5th March 2020
3.1	Preferred Strategy endorsement to consult	17/02/2020	Social Justice Strategy reviewed with Judith Langdon
4.0	Revised Delivery Agreement	05/03/2020	Timetable amended further to account for slippage as a result of the pre-election period preceding the December 2019 General Election, the additional time and work needed to inform the Preferred Strategy and delays associated with joint working with neighbouring local authorities on joint evidence base work.
4.1	Revised Delivery Agreement and review of Issues, Vision and Objectives and of evidence base in the light of the Covid-19 pandemic.	07/10/2010	Timetable amended further to account for Covid-19 pandemic and revised Welsh Government population and household projections.
5.0	Revised Growth and Spatial Options scrutiny	17/11//2020	Draft for Economic Development Select Committee 10th December 2020
5.1	Revised Growth and Spatial Options endorsement to consult, including identifying growth option 5 and spatial option 2 as the proposals at this stage of the process.	03/12/2020	Draft for Cabinet report 16th December 2020

6.0	Preferred Strategy Consultation endorsement to consult.	24/06/2021	Draft for Council Report 24th June 2021
7.0	Pre-decision scrutiny by Place Scrutiny Committee of the proposal to progress the Replacement Local Development Plan (RLDP) prior to it being reported to Council on 27th September 2022.	26/09/2022	Draft for Scrutiny Committee and Council reports
7.1	Council endorsement on proposal to progress the Replacement Local Development Plan (RLDP).	27/09/2022	Draft for Council Report 27th September 2022
8.0	Pre-decision scrutiny by Place Scrutiny Committee of the Replacement Local Development Plan (RLDP) new Preferred Strategy prior to it being reported to Council on 1st December 2022 to seek Council's endorsement for the new Preferred Strategy to be issued for statutory consultation/engagement and stakeholder involvement.	10/11/2022	Draft for Scrutiny Committee and Council reports
8.1	Council endorsement of the Replacement Local Development Plan (RLDP) new Preferred Strategy to be issued for statutory consultation/engagement and stakeholder involvement in December 2022 - January 2023.	01/12/2022	Draft for Council Report 1st December 2022
8.2	Pre-decision scrutiny by Place Scrutiny Committee of post-consultation updates to the Replacement Local Development Plan (RLDP) Preferred Strategy, prior to it being reported to Council on 26th October 2023 to seek endorsement of the amendments as the basis for preparing the Deposit Plan.	28/09/2023	Draft for Scrutiny Committee and Council Reports

9.0	Pre-decision scrutiny on the Deposit Replacement Local Development Plan (RLDP), prior to it being reported to Council on 24th October 2024 to seek Council's endorsement of the Deposit Plan to commence statutory consultation/engagement with communities and key stakeholders.	10/10/2024	Draft for Place Scrutiny Report (10th October 2024)
9.1	Council endorsement of the Deposit Replacement Local Development Plan (RLDP) to commence statutory consultation/engagement with communities and key stakeholders, and to seek Council's agreement of the revised RLDP Delivery Agreement for submission to Welsh Government for approval.	24/10/2024	Draft for Council Report (24th October 20024)

Place Scrutiny 10th October 2024

Note: Minutes do not serve as a verbatim record of the meeting but provide a summary of the Committee's discussion. For the full discussion, please access the recording of the meeting:

www.youtube.com/watch?v=Ie1EoOVikQo&list=PLLmqn4nAaFJAaDA9m3C2P8ZdJsca-bkSU&index=18

1. Apologies for Absence

None.

2. Declarations of Interest

None.

3. Public Open Forum

The Chair advised that many submissions had been received and that it would not be possible to read them out at the meeting due to the significant number. She advised that written submissions received in sufficient time ahead of the meeting had been shared with the committee, Cabinet Member and officers, and that any submissions received since, would be forwarded to the Cabinet Member and officers for further consideration.

The Chair noted receipt of 15 written submissions objecting to site CS0270 in the plan, and a further two objecting to land at Mounton Road and land west of Usk, Penperllenni. Three members of the public spoke at the meeting about CS0270 raising a number of concerns:

- Sufficiency of infrastructure, how homes will be zero carbon when the developer has not committed to it until 2050, potential increases in phosphate discharge which already exceed permissible levels, questioning whether sufficient funds will be available, asking why the 270 homes can't be added to Abergavenny, and suggesting it is too far from the town centre for walking or cycling whereas at Abergavenny the homes would be closer to the train station.

- Noting that CS0270 is a special site given its beauty and location, its importance to the greater horseshoe bats, its visibility from the Area of Outstanding Natural Beauty and proximity to a scheduled ancient monument, objecting to the loss of prime agricultural land – suggesting that CS0274 would therefore be a better alternative.

- Raising concerns about traffic emissions and air quality monitoring in Monmouth, suggesting that the current methodology is flawed and lacks sufficient data on real or projected emissions.

The Chair thanked the public for their input, through sending written submissions and by contributing to the meeting via the Public Open Forum.

4. RLDP Deposit Plan

Cabinet Member Paul Griffiths introduced the report, delivered a presentation, and answered the members' questions with Craig O'Connor. In his presentation of the report, Councillor Griffiths acknowledged the following:

- Demographic Trends: He highlighted the decline in school-age and working-age populations in Monmouthshire, contrasting with the growth in the over-65 population, emphasizing the need to reverse these trends to maintain sustainable communities.

- Housing and Affordability: He stressed the importance of increasing the supply of housing, particularly affordable housing, to retain young people in the county, highlighting that 50% of the population cannot afford to purchase homes on the open market, necessitating a high level of affordable housing in the plan.

- Plan Proposals: He outlined the plan to provide 2000 new homes over 15 years, with 50% being affordable, explaining that 660 of these would be social housing for rent, with 330 being low-cost home ownership options.

- Employment Land: He discussed the provision of 48 hectares of employment land to support job growth and address the lack of land for business expansion.

- Sustainability and Infrastructure: He emphasized that new homes will be within walking distance of existing settlements, will be net zero carbon, and will be supported by necessary infrastructure.

- Overall Vision: He explained that the plan aims to create younger, more sustainable communities by providing appropriate housing and job opportunities, whilst protecting the environment, and supporting existing town centres.

The Chair thanked the Cabinet Member for presenting the report and proceeded to take questions and key points from the Committee, with answers being given by the Cabinet Member and officers.

Questions and key points raised by the Committee:

- A member asked whether in relation to candidate site CSO270, what the impact would be of the influx of residents arising from the rollover sites from the previous LDP of 280 homes, and how this would affect the number of vehicles on the roads.

  They were advised that the_planning policy team have reviewed the sites and considered the impact on existing infrastructure and that the Dixton Road site was identified as the most appropriate and sustainable option.

- It was asked whether the 5.8-hectare candidate employment site is sufficient to provide enough employment opportunities for those living in the new homes, in order that Monmouth's residents fulfil the criterion of living sustainable lifestyles. The member raised their concerns about further exacerbation of road congestion.

  They were advised that there is 4.5 hectares of employment land allocated at the Wonastow Rd site, and that this should create jobs within the area to balance the housing.

- A member asked how Monmouth qualifies as a sustainable development considering the severe lack of public transport links.

  They were advised that Monmouth was allocated a site to keep the community sustainable and ensure a balanced demographic. They also confirmed that the strategic phosphate solution for Monmouth enables sustainable development.

- A member asked why the local transport strategy isn't included within the RLDP and why transport assessments aren't conducted until the planning stage.

  Officers advised that infrastructure considerations are part of the planning process, and transport assessments are typically conducted during the planning stage.

- A question was asked as to what processes can be put in place to mitigate the potential harms caused by the post-development loss of green spaces, which could increase surface runoff and intensify flooding.

They were advised that all developments in Wales are subject to sustainable drainage requirements, meaning that runoff must be managed within the site itself to prevent increased flood consequences.

- A member questioned whether the 'dark skies policy' will sufficiently mitigate the harms caused to the greater horseshoe bats, when taking into account the urbanisation of the site and the loss of their feeding locations.

  The officers reassured that environmental considerations, including the impact on local wildlife, are part of the planning process and will be taken into account.

- A member asked about the land ownership of the proposed Abergavenny East development; specifically if the landowner of CS0293 has agreed to the master plan, and if the land within Monmouth Housing Association's control is within its control. The member expressed concerns about the ability to deliver the proposed master plan if these conditions are not met.

  Officers confirmed that both landowners have put their sites forward for development, but that neither has fully agreed to the master plan. The master plans are developed based on the planning policy framework that the Council wishes to impose. Negotiations and detailed conversations with all partners will continue, to ensure that the development proposal is realised.

- A member queried whether the Council is the Council prepared to use compulsory purchase orders (CPOs) as a policy principle to advance key strategic developments.

  The Cabinet Member advised that a range of opportunities are available to the Council, and that the approach will be pragmatic and effective, with negotiation being the first priority.

- A member asked about the potential harms from post-development urbanisation, specifically the paving of gardens, which they were concerned could increase runoff and intensify flooding. The member asked whether anything can be done to mitigate such potential harms.

  Officers responded that this was a valid point and suggested that the Planning Committee could reduce permitted development rights further if there is evidence that it would result in additional surface runoff. Additionally, any application will need to submit a flood consequence assessment at the planning stage.

- A member highlighted the need to ensure good connections for the large development on the eastern side of Abergavenny, and stressed they felt it was

important to achieve a balance between housing and employment land across the county. They raised their concern about pedestrians crossing the AA465 and emphasised the need to integrate travel infrastructure in Abergavenny, asking for reassurance about travel connections if the Abergavenny East development goes ahead.

The Cabinet Member advised that discussions with the developer, the Design Commission, and the Trunk Road Agent have indicated plans for three crossing places across the A465, controlled by lights, to ensure safe pedestrian and driver experiences. He explained that the infrastructure would aim to ensure residents feel comfortable crossing the road and would integrate the new development with the town.

- Concern was expressed by a member about the significant infrastructure gaps in areas like Monmouth, Caldicot, and Chepstow, particularly in terms of transport, healthcare, and education. They asked how the plan would ensure that communities wouldn't be even more strained in terms of essential services. They also expressed concerns about the practicality of walking and cycling for working couples and young families and their view that there is a lack of clear commitments and timelines for improving the infrastructure.

  The Cabinet Member and officers responded that the RLDP is a high-level document and advised that detailed planning applications will follow for all sites. They emphasised that active travel links are being integrated from the early stages to encourage walking and cycling. They also advised that there is ongoing work with the Health Board to manage and respond to healthcare pressures and they stressed the importance of achieving balanced development across the county.

- Another member echoed their concerns around the lack of infrastructure and stated that there is a need for detailed planning to support the proposed developments.

  The Cabinet Member and officers discussed the infrastructure delivery plan, which includes provisions for transport, education, and healthcare facilities to support the new developments.

- A member questioned the viability of the RLDP without an in-depth viability statement, especially for major sites. They asked how 50% affordable housing and net zero carbon ready homes would be achieved.

  Officers explained that the RLDP allocates land for development, and that the Council has other strategies to attract businesses and create jobs. The economic

strategy for example, aims to create a mix of job opportunities, including high-value jobs. The officer confirmed that the viability of 50% affordable housing has been assessed and has been deemed achievable.

- It was questioned why Caldicot East/Portskewett was being identified for a significant share of the county's housing needs and what was the rationale for concentrating development in an area with already limited amenities. The member asked for clarification on plans to address these issues before construction begins.

  Officers responded that Caldicot is considered to be a sustainable place for development due to its amenities and connections. Members were advised that the development will include a new primary school and active travel links to ensure sustainability. Officers confirmed that the Council is working to ensure that infrastructure and amenities are in place to support the new development.

- A member asked for clarity on the land grade for the employment land north of the Portskewett site and raised their concern as to whether farmers are being kept up to date with the process, highlighting a farmer who was unaware of the proposals.

  Officers acknowledged the need to engage with all landowners and farmers and promised to follow up on the specific case mentioned, reiterating that the Council is committed to ensuring that all stakeholders are informed and involved in the process.

- A member raised concerns about the traffic congestion at High Beech Roundabout in relation to the Mountain Road site and suggested that sites in Chepstow should be contingent on High Beech roundabout improvements. The member expressed concern that there are so few references to road infrastructure in the main body of the report and highlighted the need for site-specific requirements for road infrastructure improvements, similar to those in previous plans.

  The Cabinet Member and officers responded that High Beech Roundabout is part of the Welsh Government's trunk road network, and that improvements are being considered through a Welsh Government study. They advised that the RLDP includes safeguarding land for potential improvements and confirmed that the development will incorporate necessary mitigations as they are identified.

- It was asked whether the 26 houses at the Shirenewton site are in addition to the 11 houses previously planned at Clearview Court and how concerns about sewage capacity in the area will be addressed.

Officers clarified that the development boundary has changed, and that the 26 houses are the new allocation, with the previous 11 houses no longer included. They acknowledged the existing sewage issues and reassured that they are committed to working with Welsh Water and NRW to address them.

- A member emphasised the need for affordable housing to be available to local people in the Shirenewton area and suggested a mix of housing sizes, including three-bedroom homes, to accommodate young families.

  Officers stated that they agreed on the importance of a housing mix and confirmed that the allocation process would prioritise local needs. The advised that the policy framework aims to provide a variety of housing options, including two, three, and one-bedroom properties, to meet the needs of the community.

- It was questioned how the public consultation for the RLDP will ensure that the voices of people who are intended to benefit from the plan can be heard, particularly working-age people and those with young children. They emphasized the need to engage this underrepresented group effectively.

  The Cabinet Member responded that the consultation process will include exhibitions, online consultations, public meetings, and drop-in opportunities in all population areas. Efforts will be made to advertise these events widely, including using gazebos on High Streets to increase visibility. He also highlighted the role of local councillors in encouraging community engagement and ensuring a balanced representation of views.

- A member sought reassurance that the RLDP will protect the Nedern and the living levels, emphasising the environmental importance of these areas and the need to balance housing development with environmental protection.

  The Cabinet Member advised the committee that the Nedern and the green land around the castle are not only protected but celebrated in the plan. He emphasised that these areas are seen as assets that will connect the existing town with the new development, ensuring their protection and integration into the community.

- The Chair expressed concerns about the removal of habitat in relation to CS0270, and the claim that a buffer would improve it, and expressed concern about the best quality land being removed.

Officers responded, advising that while development will result in the loss of some agricultural land, the plan includes measures to enhance the remaining habitat, in line with planning policy requirements.

- Concerns were expressed about traffic congestion issues at the proposed site, given the increase in cars, as well as pollution, and it was asked how the exit on to Hereford Road can qualify as an emergency exit. A member queried whether there are any guarantees that the site will not grow further.

  The Cabinet Member and officers responded, discussing the infrastructure requirements, including improvements to the local bus network and safeguarding land for potential road improvements. They confirmed that detailed transport assessments will be conducted at the planning application stage. The Cabinet Member acknowledged the importance of addressing pollution and mentioned that the environmental health team would review the concerns raised about air quality.

- Another member questioned the possibility of extending the consultation period.

  The Cabinet Member explained that there are various engagement methods for the consultation process, and he emphasised the role of local councillors in encouraging community participation.

- A question was asked as to whether the affordable housing can really be considered as 'affordable' and whether there would be a consequent impact on the Section 106 monies associated with developments.

  Officers explained that viability assessments will ensure the 50% affordable housing target is achievable and that the mix of social rent, shared ownership, and market housing options will address affordability. The Cabinet Member Griffiths addressed concerns about the affordability of housing, explaining that the proposals are based on the local housing needs assessment. He emphasized that 50% of the population can afford market housing, 17% can afford low-cost home ownership or shared equity, and the remainder would need social rent. He also mentioned that shared equity properties revert to the Council or social landlord at the point of sale to ensure they remain affordable.

  The Cabinet Member also sought to reassure the committee that the sums required for Section 106 contributions in the future are comparable to those achieved in the past, indicating that the stress on affordable and zero-carbon housing will not squeeze out funding for necessary infrastructure.

Additional Comments from Members

- A member expressed their concern about the visibility of the site from the Area of Outstanding Natural Beauty and the effect on the view when entering Monmouth.

- Another member emphasised the need to encourage more working age people and retain younger people in the county.

- It was also queried how the Council plans to avoid the risk of Monmouthshire becoming more of a commuter zone than it already is.

Chair's Summary:

As part of her summary, the Chair highlighted the following key points and issues raised by members during the debate:

- Active travel concerns and traffic growth.
- Concerns about commuting traffic due to higher-paid jobs outside the area.
- Concerns about amenities in the Portskewett ward.
- Concerns about the healthcare infrastructure in all areas.
- Monmouth's lack of travel links.
- Concerns about traffic congestion at the Mounton Road site.
- Some concerns about car emissions and pollution, members stressing the need to protect the Nedern and Castle grounds.
- Dark skies policy and bat habitat concerns.
- The need to balance development with environmental protection.
- Concern about the Sewage issues in the Mounton Brook area.
- The need for affordable housing for local people and appropriate housing sizes for growing families, particularly the importance of housing for younger people.
- Questions around Abergavenny East development, concerns particularly relating to transportation and active travel, the master plan, land ownership, and compulsory purchase considerations.
- Ensuring local voices are heard and engaging the community effectively.

The Chair acknowledged the substantial public input into the meeting, both in terms of speakers and written submissions and advised that all written submissions would be forwarded to the Cabinet Member and officers following the meeting for their ongoing consideration.

Thanks were given to the public for their input and the Chair explained that the Place Scrutiny Committee was unable to make decisions, but having scrutinised the RLDP

Deposit Plan would be offering its feedback to the Cabinet Member and Officers, as to whether the Committee supports the plan in its current form.

A vote took place, with four members of the committee expressing they were not in favour of the plan in its current form and four members supporting the plan in its current form (1 member having left early).

5. Place Scrutiny Committee Forward Work Programme and Action List

The Forward Work Programme was noted and the timescales for the Parking Review would be clarified.

6. Cabinet and Council Forward Plan

The plan was noted.

7. To confirm the minutes of previous meetings:

- 11th July 2024
- 24th July 2024 (Special)
- 3rd September 2024 (Special)

The minutes were confirmed, proposed by Councillor Lucas and seconded by Councillor Wright.

8. Next Meeting: Confirmed as 7th November 2024

Meeting Close

Monmouthshire Scrutiny

Place Scrutiny Committee ~ Feedback from the committee on 10th October 2024

Note: This provides feedback from the committee. It does not serve as a verbatim record of the meeting. The minutes of the meeting will provide a fuller discussion, or please access the recording of the meeting:

www.youtube.com/watch?v=le1EoOVikQo&list=PLLmqn4nAaFJAaDA9m3C2P8ZdJsca-bkSU&index=18

Report Item 3: Public Open Forum

The Chair noted receipt of 15 written submissions objecting to site CS0270 in the plan, and a further two objecting to land at Mounton Road and land west of Usk, Penperlleni. Three members of the public spoke at the meeting about CS0270, in particular, raising a number of concerns:

- Sufficiency of infrastructure, how homes will be zero carbon when the developer has not committed to it until 2050, potential increases in phosphate discharge which already exceed permissible levels, questioning whether sufficient funds will be available, asking why the 270 homes can't be added to Abergavenny, and suggesting it is too far from the town centre for walking or cycling whereas at Abergavenny the homes would be closer to the train station.
- Noting that CS0270 is a special site given its beauty and location, its importance to the greater horseshoe bats, its visibility from the Area of Outstanding Natural Beauty and proximity to a scheduled ancient monument, objecting to the loss of prime agricultural land – suggesting that CS0274 would therefore be a better alternative.
- Raising concerns about traffic emissions and air quality monitoring in Monmouth, suggesting that the current methodology is flawed and lacks sufficient data on real or projected emissions.

Report Item 4: RLDP Deposit Plan

Key points raised by the Committee Members:

Significant discussion took place, with the following questions and key points raised by the Committee for consideration by the Cabinet Member:

- Regarding CSO270, what will be the impact of the influx of residents from the rollover sites from the previous LDP of 280 homes, and how will this affect the number of vehicles on the roads?
- Is the 5.8-hectare candidate employment site sufficient to provide enough employment opportunities to potentially fill the new homes in order that Monmouth's residents fulfil the criterion of living sustainable lifestyles? What about the further exacerbation of road congestion?
- How does Monmouth qualify as a sustainable development considering the severe lack of public transport links?
- Why is the local transport strategy not bundled with the RLDP documents, and are transport assessments not conducted until the planning stage?
- What processes can be put in place to mitigate the potential harms caused by the post-development loss of green spaces, which could increase surface runoff and intensify flooding?
- Will the dark skies policy be enough to mitigate the harms caused to the greater horseshoe bats, considering the urbanisation of the site and the loss of their feeding locations?
- Has the landowner of CS0293 agreed to the masterplan, and is CS0213 indeed within Monmouth Housing Association's control?
- Is the Council prepared to use compulsory purchase orders (CPOs) as a policy principle to advance key strategic developments?
- A member noted the importance of achieving a balance between housing and employment land across the county, and emphasised the importance of integrating travel infrastructure in Abergavenny, especially given concern about crossing the A465
- Can the committee have reassurance about travel connections if the Abergavenny East development goes ahead?
- A member expressed concern about the significant infrastructure gaps in areas like Monmouth, Caldicot, and Chepstow, particularly in terms of transport, healthcare, and education. They expressed concerns about the practicality of walking and cycling for working couples and young families and the lack of clear commitments and timelines for improving infrastructure
- How will the plan ensure that communities won't see even more strain on services?

- How can the committee endorse the plan with large gaps e.g. the lack of an in-depth viability statement, especially for major sites?
- How will the cost of 50% affordable housing and net zero carbon ready homes be borne?
- Why is Caldicot East/Portskewett being earmarked for such a significant share of the county's housing needs? What is the rationale behind concentrating development in an area with already limited amenities?
- How does the Council plan to avoid the risk of Monmouthshire becoming more of a commuter zone than it already is?
- Can the committee have clarity on the land grade for the employment land being proposed north of the Portskewett site?
- Can members have clarity about farmers being kept up to date, as at least one local farmer has reported that he is unaware of the proposals?
- A member raised concerns about the traffic congestion at High Beech Roundabout in relation to the Mountain Road site and suggested that sites in Chepstow should be contingent on High Beech roundabout improvements.
- A member expressed concern that there are so few references to road infrastructure in the main body of the report.
- Are the 26 houses at the Shirenewton site in addition to the 11 houses previously planned at Clearview Court? How will concerns about sewage capacity in the area be addressed?
- A member emphasised the need for affordable housing to be available to local people in the Shirenewton area and suggested a mix of housing sizes, including three-bedroom homes, to accommodate young families.
- A member emphasised the need to encourage more working age people and retain younger people in the county
- How will the public consultation for the RLDP ensure that the voices of people who are intended to benefit from the plan be heard, particularly working-age people and those with young children?
- Can we have reassurance that the RLDP will protect the Nedern and the living levels?
- A member expressed concerns about the removal of habitat in relation to CS0270, and the claim that a buffer would improve it, and expressed concern about the best quality land being removed.

- A member expressed concern about the visibility of the site from the Area of Outstanding Natural Beauty and the effect on the view when entering Monmouth.
- Concerns were expressed about traffic congestion issues at the proposed site, given the increase in cars, as well as pollution, and it was asked how the exit on to Hereford Road can qualify as an emergency exit.
- Would it be possible to extend the consultation period?
- Can the affordable housing really be considered as such, and will there be an impact on Section 106 money?
- Can there be any guarantees that the site will not grow further?

The Chair thanked the officers and Cabinet Member for the report and their responses to the committee's questions, and thanked the public for their contributions. The Chair reminded members and the public that the committee does not have decision-making powers but noted that when put to a vote, four members of the committee were not in favour of the plan in its current form (with 4 members for, 1 member having left early). The committee's feedback and the submissions from the public will be sent to the Cabinet Member and officers for their consideration.

MONMOUTHSHIRE COUNTY COUNCIL
REPORT

SUBJECT: **Statement of Gambling Policy and Proposals for Casinos**

DIRECTORATE: **Social Care, Safeguarding and Health**
MEETING: **Full Council**
Date to be considered: 24th October 2024
DIVISION/WARDS AFFECTED: All Wards

1. PURPOSE:

1.1 To consider the Council's existing resolution to not permit casinos within the County of Monmouthshire.

1.2 To agree the Council's 'Statement of Gambling Policy 2025'.

2. RECOMMENDATION(S):

2.1 To refuse any casino applications made under the Gambling Act 2005, and stated within the Authority's Gambling Policy.

2.2 To adopt the 'Statement of Gambling Policy 2025' for Monmouthshire County Council, provided in Appendix A (changes highlighted in red).

3. KEY ISSUES

3.1 Section 349 of the Gambling Act 2005 requires that before each successive period of three years, the Council, in its role as the Licensing Authority, prepares and publishes a policy statement that it proposes to apply in exercising its functions under the Act during that period. The current Gambling policy covers the three-year period that began on 31 January 2022. A review must therefore be undertaken and the next Gambling policy published before 31 January 2025.

3.2 The Council will need to consider firstly if they wish to continue with the resolution not to have a casino within the County. The decision on this will then be inserted into the revised Gambling Policy that will be published on 31 January 2025.

3.3 Central Government upon the advice of the Casino Advisory Panel permitted 8 large and 8 small casinos along with those who had grandfather rights when the Act came into force, which have all been duly issued. There is currently no further provision for more casinos to be allocated. However, the Council still need to consider the course of action they wish to take with casinos and place this within the Gambling Policy should the availability of casinos change.

3.4 Before any licence for a Casino is granted, the Casino Advisory Panel will advise Central Government that the area is in need of regeneration and Monmouthshire would have to satisfy them that this is the case along with the type of area, social impact, community benefits and unique characteristics.

3.5 With regards to the Policy and how the Council will discharge their functions. The Policy must contain objectives regarding the following;

- Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime,
- Ensuring that gambling is conducted in a fair and open way, and
- Protecting children and other vulnerable persons from being harmed or exploited by gambling.

The Council will also need to have regard to any relevant code of practice issued by the Secretary of State, guidance issued by the Gambling Commission, how they exercise their functions consistent with the objectives and in accordance with the policy itself.

3.6 The Policy must be approved by Full Council and can last for a period of three years, in accordance with Section 154(2) of the Gambling Act 2005. It further states within Section 349 the prior to approval consultation must take place with:-

- The Chief Officer of police for the Authority's area;
- One or more persons who appear to the Authority to represent the interests of persons carrying on gambling businesses in the Authority's area, and
- One or more persons who appear to the Authority to represent the interests of persons who are likely to be affected by the exercise of the Authority's functions under the Act.

3.7 The revised policy must be published and in place for commencement on 31st January 2025. Licensing Officers within Monmouthshire, Torfaen, Caerphilly, Blaenau Gwent and Newport has worked collaboratively with the aim of all five Authorities adopting this Policy, subject to changes pertinent to each Authorities area and character.

3.8 At the Licensing and Regulatory Committee on 21st May 2024, Members agreed in principle to retain the current resolution not to issue casino licences within the County of Monmouthshire prior to consideration at Full Council. They further agreed at this meeting to review the 'Statement of Gambling Policy 2025', following the consultation period of this document, which ended on 31st August 2024. Responses were received on this consultation from GambleAware, Aneurin Bevan Public Health Team, Aneurin Bevan University Health Board and GamCare and their recommendations has been included under Section 2.6 of the proposed policy. Members reviewed the recommended Policy following consultation at the Licensing and Regulation on 17th September 2024 prior to submission at Full Council.

3.9 At these meetings, Members were made aware that since its publication in January 2022, the current Gambling policy has proved effective in guiding Officers, Members, the holders of licences and other authorisations granted under the Gambling Act 2005, plus members of the public, in understanding how the Authority will apply its' discretion and use its powers under the Act. It is therefore not considered necessary to greatly change the information contained in the current Gambling policy.

3.10 Additionally, it was noted that the Gambling Commission is currently undertaking a review of the Social Responsibility Code of Practice, which will be done in stages with the final changes likely to be in force on 17th January 2025. The commission will review test purchasing, strengthen age verificaton from 'Think 21' to a 'Think 25' approach (if a person looks under 25 they will be asked to verify their age to prove they are in fact over 18 years old and permitted to gamble) and will also look at financial vulnerability checks.

The Gambling Commission has indicated that Local Authorities should still proceed with their updated Policy as the proposals in the Code of Practice should not impact the Local Authority statement of policy – refer to Gambling Commission statement.

4. REASONS:

4.1 The policy is necessary to guide consistent decisions and takes account of guidance.
4.2 There is a need to take account of collaborative approaches
4.3 To ensure that applications with no relevant information to consider can be dealt with without unnecessary delay.
4.4 To enforce the provisions of the Gambling Act 2005 effectively.

5. RESOURCE IMPLICATIONS:

5.1 Any additional costs will be absorbed within our existing licensing budget.

6. WELLBEING AND FUTURE GENERATIONS IMPLICATIONS

6.1 The 'Future Generations' template is attached as Appendix B. In summary, currently the Authority has a resolution not to permit casinos within the County. If this resolution is lifted it may promote excessive gambling within casinos. This may in turn impact on those who are vulnerable or addicted to gambling.

6.2 If the resolution not to permit casinos is maintained, this protects children and so contributes positively to the wellbeing of existing and future generations.

6.3 It is a statutory requirement to compile a Gambling Policy, as outlined in Section 3. Although not a 'proposal' (therefore not requiring full assessment) it does contribute positively to protecting children and other vulnerable persons from being harmed or exploited by gambling.

7. CONSULTEES:

- SLT
- Cabinet Members
- Chairs of Select Committee
- Head of Legal Services
- Relevant bodies as outlines in 3.6 and 3.7 above
- The Licensing and Regulatory Committee (21st May 2024 and 17th September 2024)

8. BACKGROUND PAPERS:

1. Monmouthshire County Council's Statement of Gambling Policy 2022
2. Gambling Act 2005
3. The Gambling Act 2005 (Licensing Authority Policy Statement) (England and Wales) Regulations 2006
4. Gambling Commission Guidance to Local Authorities

9. AUTHOR:

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Gambling Act 2005
Statement of Licensing Policy 2025

January 2025

Further information can be obtained from:
Licensing Section
Monmouthshire County Council
Abergavenny Community Education Centre
Old Hereford Road
Abergavenny
NP7 6EL
Tel: 01873 735420
Email: licensing@monmouthshire.gov.uk
Website: www.monmouthshire.gov.uk/licensing

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1. Statement of Licensing Policy

1.1 Introduction

The Gambling Act 2005 requires the Council to prepare and publish a "Statement of Licensing Policy" that sets out the principles the Council proposes to apply in exercising its licensing functions when dealing with applications for Premises Licences, as required by the Act.

This Policy Statement takes effect on 31st January 2025. This Licensing Authority will update and publish a new Licensing Policy whenever necessary but in any case within 3 years of the date of this Policy, and will fully consult with partners, trade associations and residents groups as appropriate at that time, any representations received will be considered at that time.

However where updates are required due to changes in national legislation, statutory guidance or contact details the council reserves the right to amend this policy without consultation where it is necessary to ensure the policy reflects national legislation or statutory guidance.

In producing the final Policy Statement the Council declares that it has had regard to the licensing objectives of the Gambling Act 2005, the Guidance to Licensing Authorities issued by the Gambling Commission, any codes of practice and any responses from those consulted on the Policy Statement.

The Council has a legal obligation to comply with all legislation that promotes equality it has a policy in place to promote equality to all. The Neighbourhoods Planning and Public Protection Service Area has its own equalities framework which is available for inspection on our website. Licensing of persons and premises under the Gambling Act 2005 will actively promote equality of service and enforcement to all members of the community.

The Human Rights Act 1998 incorporates the European Convention on Human Rights and makes it unlawful for a local authority to act in a way that is incompatible with such a right. The council will have regard to the Human Rights Act when considering any licensing issues, and particularly in respect of the way in which applications are considered and enforcement activities are carried out.

The council acknowledges that it may need to depart from this Policy and from the guidance issued under the Act in individual and exceptional circumstances, and where the case merits such a decision in the interests of the promotion of the licensing objectives. Any such decision will be taken in consultation with the appropriate legal advisors for the Licensing Authority, and the reasons for any such departure will be fully recorded.

1.2 Profile of Monmouthshire

The County of Monmouthshire is mainly rural in character. The County has five main towns namely Monmouth, Abergavenny, Caldicot, Chepstow and Usk, which are surrounded by numerous villages, each with their own individual character.

The area has a population of approximately 93,000. Monmouthshire is not densely populated, there is approximately 1 person per hectare, although there are concentrations of housing in some areas.

Figure 1

Monmouthshire County Council

Figure 2

Monmouthshire in Wales UK

1.3 Objectives

In exercising most of its functions under the Gambling Act 2005 the Council, as the Licensing Authority, must have regard to the following licensing objectives:

- **Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime;**
- **Ensuring that gambling is conducted in a fair and open way;**
- **Protecting children and other vulnerable persons from being harmed or exploited by gambling.**

It should be noted that the Gambling Commission has stated: "The requirement in relation to children is explicitly to protect them from being harmed or exploited by gambling".

The Council is aware that, as per Section 153, in making decisions about premises licences and temporary use notices it should aim to permit the use of premises for gambling insofar as it thinks it:

- **In accordance with any relevant code of practice issued by the Gambling Commission;**
- **In accordance with any relevant guidance issued by the Gambling Commission;**
- **Reasonably consistent with the licensing objectives;**
- **In accordance with the Council's Statement of Licensing Policy.**

1.4 The Licensing Authority Functions

The Council is required under the Act to:

- Be responsible for the licensing of premises where gambling activities are to take place by issuing Premises Licences;
- Issue Provisional Statements;
- Regulate members' clubs and miners' welfare institutes who wish to undertake certain gaming activities via issuing Club Gaming Permits and/or Club Machine Permits;
- Issue Club Machine Permits to Commercial Clubs;
- Grant permits for the use of certain lower stake gaming machines at unlicensed family entertainment centres;
- Receive notification from alcohol licensed premises (under the Licensing Act 2003) of the use of two or fewer gaming machines;
- Issue Licensed Premises Gaming Machine Permits for premises licensed to sell/supply alcohol for consumption on the licensed premises, under the Licensing Act 2003, where there are more than two machines;
- Register small society lotteries below prescribed thresholds;
- Issue Prize Gaming Permits;
- Receive and endorse Temporary Use Notices;
- Receive Occasional Use Notices;
- Provide information to the Gambling Commission regarding details of licences issued (see section below on information exchange);
- Maintain registers of the permits and licences that are issued under these functions.

It should be noted that local licensing authorities are not involved in licensing remote gambling at all, which is regulated by the Gambling Commission via Operator Licences.

The Council recognises that the licensing function is only one means of promoting delivery of the three objectives and should not therefore be seen as a means for solving all problems within the community. The Council will therefore continue to work in partnership with neighbouring authorities, Heddlu Gwent Police, the Community Safety Partnership, Public Health, local businesses, local people and those involved in child protection to promote the

licensing objectives as outlined. In addition, the Council recognises its duty under Section 17 of the Crime and Disorder Act 1998, with regard to the prevention of crime and disorder.

1.5 Consultation

The Council has consulted widely upon this Statement before finalising and publishing. A list of those persons consulted is provided below, in line with the Act and the Gambling Commission's Guidance. Further details, together with a list of comments made and the consideration by the Council of those comments is available on request.

- The Chief Officer of Police;
- The Fire Authority;
- Representatives of the holders of various licences for premises within the County who will be affected by this Policy;
- Bodies representing businesses and residents in the County;
- Departments (including Responsible Authorities) within the Council with an interest in the licensing of gambling;
- Local Safeguarding Children Board;
- County Councillors
- Community and Town Councils;
- Other organisations as appear to be affected by licensing matters covered by this Statement;
- H.M. Revenue and Customs.
- Local Health Board

Consultation took place between 1st June 2024 and 31st August 2024 and, as far as practicable, the Council followed the Consultation Principles issued by the government which is available at https://www.gov.uk/government/publications/consultation-principles-guidance

This policy was approved at a meeting of the Full Council on XXXXX and was published on 3rd January 2025, as well as being available at www.monmouthshire.gov.uk

1.6 Responsible Authorities

In exercising the Council's powers under Section 157(h) of the Act to designate, in writing, a body that is competent to advise the Council about the protection of children from harm, the following principles have been applied:

- The need for the body to be responsible for an area covering the whole of the Council's area;
- The need for the body to include senior and responsible representatives of appropriate public bodies in the county borough area, who have as a principal duty, responsibility for the protection of children from harm

In accordance with the Gambling Commission's Guidance this Council designates the Social Care, Safeguarding and Health Department for this purpose. Details of the bodies identified under the Act that are to be treated as Responsible Authorities are available via the Council's website.

1.7 Interested Parties

Interested Parties can make representations about licence applications, or apply for a review of an existing licence based on the three licensing objectives as detailed in paragraph 1.3 of this Policy Statement.
An Interested Party is someone who:-

(a) Lives sufficiently close to the premises to be likely to be affected by the authorised activities;
(b) Has business interests that might be affected by the authorised activities; or
(c) Represents persons in either of the two groups above.

The principles the Council will apply to determine whether a person is an Interested Party are:

Each case will be decided upon its merits. This Council will not apply a rigid rule to its decision-making. It will consider the examples of considerations provided in the Gambling Commissions' Guidance for local authorities. It will also consider the Gambling Commission's Guidance that "business interests" should be given the widest possible interpretation and include partnerships, charities, faith groups and medical practices and Local Health Board.

Interested Parties can be persons who are democratically elected, such as Councillors and MP's. No specific evidence of being asked to represent an interested person will be required as long as the Councillor/MP represents the ward likely to be affected. Likewise, Town and Community Councils likely to be affected will be considered as interested parties. Other than these, however, this Council will generally require written evidence that a person, body (e.g. an advocate/relative) 'represents' someone who either lives sufficiently close to the premises to be likely to be affected by the authorised activities and/or business interests that might be affected by the authorised activities. Correspondence from one of these persons, requesting the representation is sufficient.

If individuals wish to approach Councillors to ask them to represent their views, then care should be taken that the Councillors are not part of the Licensing and Regulatory Sub-Committee dealing with the licence application or in any other way have a personal interest that would preclude them from participating in a hearing. If there are any doubts then please contact the Licensing Section.

1.8 Exchange Of Information

The principle that the Council will apply in respect of the exchange of information between it and the Gambling Commission and those bodies listed in Schedule 6 of the Act is that it will act in accordance with the provisions of the Gambling Act 2005 which includes the provision that the data protection legislation, as defined in section 3 of the Data Protection Act 2018, will not be contravened. The Council will also have regard to any guidance issued by the Gambling Commission to Local Authorities on this matter, as well as any relevant regulations issued by the Secretary of State under the powers provided in the Gambling Act 2005.

1.9 Enforcement

The Council's principles are that it will be guided by the Gambling Commission's Guidance to local authorities, the Regulators Code and the council's enforcement policy. It will endeavour to be:

- Proportionate: regulators should only intervene when necessary, remedies should be appropriate to the risk posed, and costs identified and minimised;
- Accountable: regulators must be able to justify decisions, and be subject to public scrutiny;
- Consistent: rules and standards must be joined up and implemented fairly;
- Transparent: regulators should be open, keep regulations simple and user friendly; and
- Targeted: regulation should be focused on the problem, and minimise side effects.

As per the Gambling Commission's Guidance to Licensing Authorities, the Council will endeavour to avoid duplication with other regulatory regimes so far as possible.

The Council has adopted and implemented a risk-based inspection programme, based on:

- The licensing objectives;
- Relevant codes of practice;
- Guidance issued by the Gambling Commission
- The principles set out in this Statement of Licensing Policy.
- The council's enforcement policy.

The main enforcement and compliance role for this Council in terms of the Gambling Act 2005 is to ensure compliance with the Premises Licences and other permissions, which it authorises. The Gambling Commission is the enforcement body for the Operator and Personal Licences. Concerns about manufacture, supply or repair of gaming machines are dealt with by the Council but should be notified to the Gambling Commission.

The council will take account of the Gambling Commissions guidance document 'Approach to Test Purchasing' when considering making test purchases at gambling premises. The council will also follow its own policies and procedures regarding the use of underage test purchasers.

The Council also keeps itself informed of developments as regards the work of the Better Regulation Delivery Office in its consideration of the regulatory functions of local authorities.

1.10 Fundamental Rights

Under the terms of the Act any individual/company may apply for a variety of permissions and have their applications considered on their individual merits. Equally, any Interested Party or Responsible Authority has a right to make relevant representations on an application or to seek a review of a licence or certificate where provision has been made for them to do so in the Act.

Applicants and those making relevant representations in respect of applications to the Council have a right of appeal to the Magistrates Court against the decisions of the Council.

1.11 Integrating Strategies and Avoiding Duplication

By consulting widely prior to this Policy Statement being published, the Council will take full account of local policies covering crime prevention, culture, transport, planning and tourism as part of an integrated strategy for the Council, Police and other agencies. Many of these strategies may not be directly related to the promotion of the three licensing objectives, but may indirectly impact upon them.

When considering any application, the Council will avoid duplication with other regulatory regimes so far as possible. Therefore, the Council will not attach conditions to a licence unless they are considered necessary, reasonable and proportionate to the use of premises for gambling consistent with the licensing objectives.

1.12 Wellbeing of Future Generations

The Wellbeing and Future Generations (Wales) Act 2015 requires all Welsh local authorities to consider the long-term impact of their decisions, to work better with people, communities and each other, and to prevent persistent problems such as poverty, health inequalities and climate change.

Monmouthshire County Council's Community and Corporate Plan sets out the wellbeing objectives for the County
https://www.monmouthshire.gov.uk/app/uploads/2023/07/MMCCommCorpPlan_Final_EN.pdf

The local strategic partnership, Monmouthshire along with the Gwent Public Service Board sets out the Well-being Assessment and Well-being Plan which you can see here https://www.gwentpsb.org/en/

Under the Crime and Disorder Act 1998 local authorities must have regard to the likely effect of the exercise of their functions on, and do all they can to prevent crime and disorder in the area. The Council will have particular regard to the likely impact of licensing on related crime and disorder in the County, particularly when considering the location, impact, operation and management of all proposed licence/permit applications, renewals and variations of conditions.

2. Premises Licences

2.1 General Principles

Premises Licences authorise the provision of gambling facilities on the following:-

- Casino Premises;
- Bingo Premises;
- Betting Premises (including race tracks used by betting intermediaries);
- Adult Gaming Centres (AGCs);
- Family Entertainment Centres (FECs).

Except in the case of Tracks (where the occupier may not be the person offering gambling), Premises Licences will only be granted to those issued with an Operating Licence by the Gambling Commission.

Premises Licences are subject to the requirements set out in the Gambling Act 2005 and regulations, as well as specific mandatory and default conditions, which are detailed in regulations issued by the Secretary of State. Licensing authorities are able to exclude default conditions and also attach others, where it is believed to be appropriate.

The Council is aware that in making decisions about Premises Licences it should aim to permit the use of premises for gambling insofar as it thinks it:-

- In accordance with any relevant code of practice issued by the Gambling Commission;
- In accordance with any relevant guidance issued by the Gambling Commission;
- Reasonably consistent with the licensing objectives; and
- In accordance with this Policy Statement.

This Council may also consider measures to meet the licensing objectives when making such decisions, for example:

- Proof of age schemes
- CCTV
- Supervision of entrances/machine areas
- Physical separation of areas
- Location of entry
- Notices/signage
- Specific opening hours
- Self-exclusion schemes
- Provision of information leaflets/helpline numbers for organisations such as GamCare;
- Measures/training for staff on how to deal with children on the premises, for example, suspected truancy from school.

This list is not mandatory, nor exhaustive, and is merely indicative of example measures.

It is appreciated that as per the Gambling Commission's Guidance for local authorities "moral objections to gambling are not a valid reason to reject applications for Premises Licences" and also that unmet demand is not a criterion for a licensing authority.

The Licence Conditions and Code of Practice (LCCP) issued by the Gambling Commission places the onus on licence holders to complete a risk assessment. The council will have regard to this when considering applications. This is covered in detail in Section 6 of this statement.

Definition of "Premises":

Premises is defined in the Act as "any place". Section 152 therefore prevents more than one premises licence applying to any place. But a single building could be subject to more than one premises licence, provided they are for different parts of the building and the different parts of the building can be reasonably regarded as being different premises. This approach has been taken to allow large, multiple unit premises such as a pleasure park, pier, track or shopping mall to obtain discrete premises licences, where appropriate safeguards are in place. However, licensing authorities should pay particular attention if there are issues about sub-divisions of a single building or plot and should ensure that mandatory conditions relating to access between premises are observed.

The Gambling Commission states in its Guidance to Licensing Authorities that: "In most cases the expectation is that a single building/plot will be the subject of an application for a licence. But, that does not mean that a single building plot cannot be the subject of separate premises licence, e.g. the basement and ground floor, if they are configured acceptably. Whether different parts of a building can properly be regarded as being separate premises will depend on the circumstances. The location of the premises will clearly be an important consideration and the suitability of the division is likely to be a matter for discussion between the operator and the licensing officer.

However, the Commission does not consider that areas of a building that are artificially or temporarily separated, for example, by ropes or moveable partitions, can properly be regarded as different premises."

The Council takes particular note of the Gambling Commission's Guidance for local authorities which states that licensing authorities should take particular care in considering applications for multiple licences for a building and those relating to a discrete part of a building used for other (non-gambling) purposes. In particular, they should be aware of the following –

- The third licensing objective seeks to protect children from being harmed by gambling. In practice that means not only preventing them from taking part in gambling, but also preventing them from being in close proximity to gambling. Therefore, premises should be configured so that children are not invited to participate in, have accidental access to or closely observe gambling where they are prohibited from participating;
- Entrances to and exits from parts of a building covered by one or more premises licences should be separate and identifiable so that the separation of different premises is not compromised and people do not "drift" into a gambling area. In this context it should normally be possible to access the premises without going through another licensing premises or premises with a permit;
- Customers should be able to participate in the activity named on the premises licence.

The Guidance also gives a list of factors, which the licensing authority should be aware of, which may include:

- Do the premises have a separate registration for business rates?
- Is the Premises' neighbouring premises owned by the same person or someone else?
- Can each of the premises be accessed from the street or a public passageway?
- Can the premises only be accessed from any other gambling premises?

2.2 Appropriate Licence Environment

The Guidance to Local Authorities and the Licence Conditions and Codes of Practice (LCCP), set out additional matters that the council should take into account when considering licence applications for premises licences.

The Guidance prescribe restrictions on gambling activities on premises, previously known as primary gambling activity. The council will consider any application based on the provisions in these codes and guidance.

Where gambling facilities are provided at premises as a supplementary activity to the main purpose of the premises; e.g. motorway service areas and shopping

malls, the council will expect the gambling area to be clearly defined to ensure that customers are fully aware that they are making a choice to enter into the gambling premises, and that the premises is adequately supervised at all times.

The Council will consider these and any other relevant factors in making its decision, depending on all the circumstances of the case.

The Gambling Commission's Guidance for relevant access provisions for each premises type is reproduced in Appendix A:

2.3 Premises "ready for gambling"

The Guidance states that a licence to use premises for gambling should only be issued in relation to premises that the licensing authority can be satisfied are going to be ready to be used for gambling in the reasonably near future, consistent with the scale of building or alterations required before the premises are brought into use.

If the construction of a premises is not yet complete, or if they need alteration, or if the applicant does not yet have a right to occupy them, then an application for a provisional statement should be made instead.

In deciding whether a premises licence can be granted where there are outstanding construction or alteration works at a premises, the Council will determine applications on their merits, applying a two stage consideration process:

- First, whether the premises ought to be permitted to be used for gambling;
- Second, whether appropriate conditions can be put in place to cater for the situation that the premises are not yet in the state in which they ought to be before gambling takes place.

Applicants should note that this authority is entitled to decide that it is appropriate to grant a licence subject to conditions, but it is not obliged to grant such a licence.

More detailed examples of the circumstances in which such a licence may be granted can be found in the Guidance.

2.4 Other Considerations

Location:

The Council is aware that demand issues cannot be considered with regard to the location of premises but that considerations in terms of the licensing objectives are relevant to its decision making. As per the Gambling Commission's Guidance for local authorities, the Council will pay particular

attention to the protection of children and vulnerable persons from being harmed or exploited by gambling, as well as issues of crime and disorder. Should any specific policy be decided upon as regards areas where gambling premises should not be located, this Statement will be updated. It should be noted that any such policy does not preclude any application being made and each application will be decided on its merits, with the onus upon the applicant showing how potential concerns can be overcome.

Planning

The Gambling Commission Guidance to Licensing Authorities states:

- In determining applications the licensing authority has a duty to take into consideration all relevant matters and not to take into consideration any irrelevant matters, i.e. those not related to gambling and the licensing objectives. One example of an irrelevant matter would be the likelihood of the applicant obtaining planning permission or building regulations approval for their proposal.

The Council will not take into account irrelevant matters as per the above guidance. In addition, the Council notes the following excerpt from the Guidance:

- When dealing with a premises licence application for finished buildings, the licensing authority should not take into account whether those buildings have or comply with the necessary planning or building consents. Those matters should be dealt with under relevant planning control and building regulation powers, and not form part of the consideration for the premises licence. Section 210 of the 2005 Act prevents licensing authorities taking into account the likelihood of the proposal by the applicant obtaining planning or building consent when considering a premises licence application. Equally the grant of a gambling premises licence does not prejudice or prevent any action that may be appropriate under the law relating to planning or building.

2.5 Duplication with other Regulatory Regimes:

The Council seeks to avoid any duplication with other statutory/regulatory systems where possible, including planning. The Council will not consider whether a licence application is likely to be awarded planning permission or building regulations approval in its consideration of it. It will though listen to, and consider carefully, any concerns about conditions, which are not able to be met by licensees due to planning restrictions, should such a situation arise.

When dealing with a premises licence application for finished buildings, the Council will not take into account whether those buildings have to comply with the necessary planning or building consents. Fire or health and safety risks will not be taken into account, as these matters are dealt with under relevant planning control, buildings and other regulations and must not form part of the consideration for the premises licence.

2.6 Licensing Objectives:

Premises licences granted must be reasonably consistent with the licensing objectives. With regard to these objectives, the Council has considered the Gambling Commission's Guidance to licensing authorities and some comments are made below.

Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime:

The Council is aware that the Gambling Commission takes a leading role in preventing gambling from being a source of crime. The Gambling Commission's Guidance does, however, envisage that licensing authorities should pay attention to the proposed location of gambling premises in terms of this licensing objective. Thus, where an area has known high levels of organised crime, the Council will consider carefully whether gambling premises are suitable to be located there and whether conditions may be suitable such as the provision of door supervisors. The Council is aware of the distinction between disorder and nuisance and will consider factors such as whether police assistance was required and how threatening the behaviour was to those who could see it, so as to make that distinction. Issues of nuisance cannot be addressed via the Gambling Act provisions.

Ensure that gambling is conducted in a fair and open way:

The Council has noted that the Gambling Commission states that it does not expect licensing authorities to become concerned with ensuring that gambling is conducted in a fair and open way, as this will be addressed via operating and personal licences. There is, however, more of a role with regard to tracks, which is explained in more detail in the "tracks" section.

Protecting children and other vulnerable persons from being harmed or exploited by gambling:

The Council has noted the Gambling Commission's Guidance for local authorities states that this objective means preventing children from taking part in gambling (as well as restriction of advertising so that gambling products are not aimed at or are, particularly attractive to children). The Council will, therefore, consider, as suggested in this Guidance, whether specific measures are required at particular premises, with regard to this licensing objective. Appropriate measures may include supervision of entrances/machines, segregation of areas, etc.

The Council is also aware of the Codes of Practice, which the Gambling Commission issues as regards this licensing objective, in relation to specific premises.

As regards the term "vulnerable persons" it is noted that the Gambling Commission does not seek to offer a definition but states that "it will for

regulatory purposes assume that this group includes people who gamble more than they want to; people who gamble beyond their means; and people who may not be able to make informed or balanced decisions about gambling due to a mental impairment, alcohol or drugs". The Council will consider this licensing objective on a case by case basis.

The Gambling Commission Guidance to Local Authorities sets out considerations that an operator must make in order to protect children and young people from accessing gambling premises.

The Licence Conditions and Codes of Practice (LCCP) prescribe how operators must prevent children from using age restricted gaming or gambling activities, particularly where gaming machines are licensed.

In particular operators must ensure that;

- all staff are trained (training is available from a number of sources including Addiction Recovery Agency (ARA) and GamCare.
- that all customers are supervised when on gambling premises
- must have procedures for identifying customers who are at risk of gambling related harm and also where to signpost people for support.
- GambleAware recently published interactive maps which will be used by local authorities. The maps show the prevalence of problem gambling severity in each area as well as usage of, and reported demand for, treatment and gambling harms. It is recommended also that operators are familiar with such maps.
- There are a number of sources that can be used to signpost people for support including GamCare, and also as well as providing training, ARA provides a free Gambling Addiction Treatment

The council will expect all operators to have policies and procedures in place as required by the LCCP codes on social responsibility to cover all aspects of the code, in particular staff training records and self-exclusion records

Further provisions with regard to self-exclusion and marketing are included in the social responsibility code. The council will take all conditions and codes into account when considering applications or performing enforcement activities.

See section 6 of this policy statement for further details and on the council's requirements in relation to the LCCP.

The Council will have regard to the Gambling Act 2003, the Gambling Commission's Guidance. The Council will also have regard the Chief Medical Officer for Wales report to support the licensing objective in order to protect children and other vulnerable persons from being harmed or exploited by gambling. It has been recognised in the joint report on the 'True Cost of Gambling' by Public Health Wales and Bangor University that population groups at greater risk of experiencing problem gambling and/or gambling related harms include:

- Children, either because of their own gambling or because of parental or carer gambling.
- Individuals living in most deprived areas, with problem gambling being over seven times higher compared to individuals living in least deprived areas.

The Council would expect applicants and licence holders to carry out the necessary checks on all relevant members of staff to ensure their suitability for employment, particularly in respect of premises where children and vulnerable people have access. The Council is guided by the recommendation of the Local Government Association's publication on the approach Council's should take to tackle gambling related harm.

2.7 Bet-Watch:

The council encourage and will support local operators to create and maintain an information sharing network to discuss issues of problem gamblers that are identified. This will also be an opportunity for operators to discuss issues with the licensing officers.

2.8 Conditions:

Any conditions attached to licences will be proportionate and will be:

- Relevant to the need to make the proposed building suitable as a gambling facility;
- Directly related to the premises and the type of licence applied for;
- Fairly and reasonably related to the scale and type of premises; and
- Reasonable in all other respects.

Decisions upon individual conditions will be made on a case by case basis, although there will be a number of measures the Council will consider utilising should there be a perceived need, such as the use of supervisors, appropriate signage for adult only areas, etc. Specific regard will be against the local risk assessment for each premise, when making such decisions. There are specific comments made in this regard under some of the licence types below. The Council will also expect the licence applicant to offer his/her own suggestions as to ways in which the licensing objectives can be met effectively, in conjunction with mandatory conditions specified in the Gambling Act 2005 (Mandatory and Default Conditions) (England and Wales) Regulations 2007.

Conditions the Council may impose on a licence could include;

Security conditions

- A minimum of two members of staff after 10pm;
- The premises will have an intruder alarm and panic button;
- A monitor shall be placed inside the premises above the front door showing CCTV images of customers entering the premises.

Anti-social behaviour conditions

- The licensee shall develop and agree a protocol with the police as to incident reporting, including the type and level of incident and mode of communication, so as to enable the police to monitor any issues arising at or in relation to the premises;
- The licensee shall place and maintain a sign at the entrance which states that 'only drinks purchased on the premises may be consumed on the premises';
- The licensee shall implement a policy of banning any customers who engage in crime or disorder within or outside the premises.

Underage controls

- Customers under 21 will have to provide ID;
- No machines in the Unlicensed Family Entertainment Centre to be sited within one metre of the Adult Gaming Centre entrance;
- Staff training records or certified copies should be available at the premises for inspection.

Player protection controls

- There shall be no cash point or ATM facilities on the premises;
- The licensee shall train staff on specific issues related to the local area and shall conduct periodic refresher training. Participation in the training shall be formally recorded and the records produced to the police or licensing authority upon request;
- Prominent GamCare documentation will be displayed at the premises.

This list is not exhaustive and merely gives an example of the type of conditions which may be imposed depending on the circumstances at each premises.

The Council will also consider specific measures, which may be required for buildings, which are subject to multiple premises licences. Such measures may include the supervision of entrances; segregation of gambling from non-gambling areas frequented by children; and the supervision of gaming machines in non-adult gambling specific premises in order to pursue the licensing objectives. These matters are in accordance with the Gambling Commission's Guidance and Codes of Practice(s).

The Council will also ensure that where category C or above machines are on offer in premises to which children are admitted:

- All such machines are located in an area of the premises which is separated from the remainder of the premises by a physical barrier which is effective to prevent access other than through a designated entrance;
- Only adults are admitted to the area where these machines are located;
- Access to the area where the machines are located is supervised;
- The area where these machines are located is arranged so that it can be observed by the staff or the licence holder; and

- At the entrance to and inside any such areas there are prominently displayed notices indicating that access to the area is prohibited to persons under 18.

These considerations will apply to premises, including buildings where multiple premises licences are applicable.

The Council is aware that tracks may be subject to one or more than one premises licence, provided each licence relates to a specified area of the track. As per the Gambling Commission's Guidance, this Council will consider the impact upon the third licensing objective and the need to ensure that entrances to each type of premises are distinct and that children are excluded from gambling areas where they are not permitted to enter.

It is noted that there are conditions, which the Council cannot attach to premises licences, which are:

- Any condition on the premises licence which makes it impossible to comply with an operating licence condition;
- Conditions relating to gaming machine categories, numbers, or method of operation;
- Conditions which provide that membership of a club or body be required (the Gambling Act 2005 specifically removes the membership requirement for casino and bingo clubs and this provision prevents it being reinstated); and
- Conditions in relation to stakes, fees, winning or prizes.

2.9 Door Supervisors:

The Gambling Commission advises in its Guidance to licensing authorities that if it is concerned that a premises may attract disorder, or be subject to attempts at unauthorised access (e.g. by children and young persons) then it may require that the entrances to the premises are controlled by a door supervisor, and is entitled to impose a premises licence to this effect.

Where it is decided that supervision of entrances/machines is appropriate for particular cases, a consideration of whether these need to be SIA licensed or not will be necessary. It will not be automatically assumed that they need to be licensed as the statutory requirements for different types of premises vary.

2.10 Adult Gaming Centres

The Council will specifically have regard to the need to protect children and vulnerable persons from harm or being exploited by gambling and will expect the applicant to satisfy the Council that there will be sufficient measures to, for example, ensure that under 18 year olds do not have access to the premises.

Where gambling facilities are provided at premises as a supplementary activity to the main purpose of the premises; e.g. motorway service areas and shopping malls, the council will expect the gambling area to be clearly defined to ensure

that customers are fully aware that they are making a choice to enter into the gambling premises and that the premises is adequately supervised at all times.

The Council will expect premises that are solely used for Adult Gaming to have windows and doors covered in such a way to stop children from looking into the venue as an extra measure to prevent the facilities appealing to children and young people. e.g. Window film, privacy screen on exit and egress points to preclude viewing inside.

2.11 (Licensed) Family Entertainment Centres

The Council will specifically have regard to the need to protect children and vulnerable persons from harm or being exploited by gambling and will expect the applicant to satisfy the Council, for example, that there will be sufficient measures to ensure that under 18 year olds do not have access to the adult only gaming machine areas. The applicant for a Family Entertainment Centre provide evidence that a suitable criminal record check with the Disclosure and Barring Service (DBS) has been conducted on all staff in his/her employment.

Children and young persons are permitted entry to licensed FECs but are not permitted to play Category C machines. The Council expects the applicant to ensure that there will be sufficient measures in place to prevent under 18 year olds having access to the adult only gaming machine areas. The Council will expect applicants to meet the licensing objectives and comply with all mandatory conditions and Codes of Practice issued by the Gambling Commission.

There is a requirement that there must be clear segregation between the types of machine in order that children do not have access to Category C machines. All Category C machines must be located in an area of the premises which is separate from the remainder of the premises by a physical barrier, which will prevent access other than through a designated entrance. The Council will seek to ensure that:

- only adults are admitted to the area where the machines are located;
- access to the area where the machines are located is supervised;
- the area where the machines are located is arranged so that it can be observed by staff of the operator or the licence holder; and
- at the entrance to, and inside any such area there are prominently displayed notices indicating that access to the area is prohibited to persons under 18

2.12 Casinos

There are currently no casinos operating within the County. Following considerable debate at full Council on XXXXX a resolution was passed to issue/not to issue casino licences within the County of Monmouthshire as provided for in section 166 Gambling Act 2005. This resolution may be reviewed as necessary, and at least every three years in line with the adoption

of the Statement of Gambling Policy. There is no right of appeal against this resolution. Potential licence applicants should note that as a 'no-casino' resolution has been passed by this Council no applications for casino premises licence will be considered. Any applications received will be returned with a notification that a 'no casino' resolution is in place.

2.13 Bingo Premises

Licensing Authorities will need to satisfy themselves that bingo can be played in any bingo premises for which they issue a premises licence. This will be a relevant consideration where the operator of an existing bingo premises applies to vary their licence to exclude an area of the existing premises from its ambit and then applies for a new premises licence, or multiple licences, for that or those excluded areas.

A holder of bingo premises licences may make available for use of a number of category B gaming machines, not exceeding 20% of the total number of gaming machines, which are available for use on the premises

Children and young people are allowed into bingo premises; however, they are not permitted to participate in the bingo and if category B or C machines are made available for use, these must be separated from areas where children and young people are allowed.

Where Category C or above machines are available in the bingo premises to which children are admitted, the Council will seek to ensure that;

- all such machines are located in an area of the premises separate from the remainder of the premises by a physical barrier to prevent access other than through a designated entrance;
- only adults are admitted to the area where the machines are located;
- access to the area where the machines are located is supervised;
- the area where the machines are located is arranged so that it can be observed by staff or the licence holder; and
- at the entrance to, and inside any such area, notices are prominently displayed indicating that access to the area is prohibited to persons under 18.

Where bingo is permitted in alcohol-licensed premises, this must be low turnover bingo only and applicants are expected to comply with any Codes of Practice and advice issued by the Gambling Commission. High turnover bingo will require a Bingo Operating Licence.

2.14 Betting Premises

Betting machines:

Self Service Betting Terminals (SSBTs):

The Act provides that a machine is not a gaming machine if it is designed or adapted for use to bet on future real events. Betting premises may make available machines that accept bets on live events, such as horseracing, as a substitute for placing a bet over the counter. These "betting machines" are not gaming machines: they merely automate the process, which can be conducted in person and, therefore, do not require regulation as a gaming machine.

However, where a machine is made available to take bets on virtual races (that is, results and/or images generated by computer to resemble races or other events) that machine **is** a gaming machine and counts towards the maximum permitted number of gaming machines, and must meet the relevant category limitations for the premises.

The Council will, as per the Gambling Commission's Guidance, take into account the size of the premises, the number of counter positions available for person-to-person transactions, and the ability of staff to monitor the use of the machines by children and young persons (it is an offence for those under 18 to bet) or by vulnerable people, when considering the number/nature/circumstances of betting machines an operator wants to offer. The premises should also display notices with contact for help organisations e.g. GamCare.

The Authority recognises that certain bookmakers have a number of premises within its area. In order to ensure that any compliance issues are recognised and resolved at the earliest stage, operators are requested to give the authority a single named point of contact who should be a senior individual and to whom the Authority will contact first should any compliance queries or issues arise.

2.15 Tracks

The Council is aware that tracks may be subject to one or more than one premises licence, provided each licence relates to a specified area of the track. As per the Gambling Commission's Guidance, the Council will especially consider the impact upon the third licensing objective (i.e. protection of children and vulnerable persons from being harmed or exploited by gambling) and the need to ensure that entrances to each type of premises are distinct and that children are excluded from gambling areas where they are not permitted to enter.

The Council will therefore expect the premises licence applicant to demonstrate suitable measures to ensure that children do not have access to adult only gaming facilities. It is noted that children and young persons will be permitted to enter track areas where facilities for betting are provided on days when dog racing and/or horse racing takes place, but that they are still prevented from entering areas where gaming machines (other than category D machines) are provided.

2.16 Gaming Machines:

There are many categories of gaming machine permitted at licensed and other premises and the number of such machines that may be permitted in each type of gambling premises are set out in the Act. The Council does not have the power to set different limits or further expand or restrict the categories of machine that are permitted. The exception to this is alcohol-licensed premises that hold gaming machine permits, where licensing authorities have discretion to specify the number of permitted gaming machines. In addition, limits are set separately in the Act for certain types of permit issued by licensing authorities. A table setting out gaming machine entitlement at each type of premises is attached at Appendix C.

There is a minimum age of 18 for all players for all category A, B and C machines, including category B3A gaming machines offering lottery style games. However there is no minimum age for players of category D machines. The holder of any permit or premises licence must comply with the codes of practice issued by the Commission on the location of and access to gaming machines by children and young persons, and the separation from category C and B machines where those are also located on the same premises.

Where the applicant holds a pool betting operating licence and is going to use the entitlement to four gaming machines, machines (other than Category D machines) should be in areas from which children are excluded.

2.17 Betting Machines:

The Council will, as per the Gambling Commission's Guidance, take into account the size of the premises and the ability of staff to monitor the use of machines by children and young persons (it is an offence for those under 18 to bet) or by vulnerable people, when considering the number/nature/circumstances of betting machines an operator wants to offer.

2.18 Applications and plans:

The Gambling Act and Regulations requires applicants to submit plans of the premises with their application, in order to ensure that the Council has the necessary information to make an informed judgement about whether the premises are fit for gambling. They will also be used for the Council to plan future premises inspection activity.

Plans for tracks should be drawn to scale sufficiently detailed to include the information required by regulations.

Some tracks may be situated on agricultural land where the perimeter is not defined by virtue of an outer wall or fence, such as point-to-point racetracks. In such instances, where an entry fee is levied, track premises licence holders may erect temporary structures to restrict access to premises.

In the rare cases where the outer perimeter cannot be defined, it is likely that the track in question will not be specifically designed for the frequent holding of sporting events or races. In such cases betting facilities may be better provided

through occasional use notices where the boundary premises do not need to be defined.

The Council appreciates that it is sometimes difficult to define the precise location of betting areas on tracks. The precise location of where betting facilities are provided is not required to be shown on track plans, both by virtue of the fact that betting is permitted anywhere on the premises and because of the difficulties associated with pinpointing exact locations for some types of track. Applicants should provide sufficient information that this Council can satisfy itself that the plan indicates the main areas where betting might take place. For racecourses in particular, any betting area subject to the "five times rule" (commonly known as betting rings) must be indicated on the plan.

2.19 Travelling Fairs

This Council is responsible for deciding whether, where category D machines and/or equal chance prize gaming without a permit is to be made available for use at travelling fairs, the statutory requirement that the facilities for gambling amount to no more than an ancillary amusement at the fair is met.

The Council will also consider whether the applicant falls within the statutory definition of a travelling fair contained in Section 286 of the Gambling Act 2005.

The 27-day statutory maximum for the land being used as a fair, is per calendar year, and that it applies to the piece of land on which the fairs are held, regardless of whether it is the same or different travelling fairs occupying the land. The Council will work with its neighbouring authorities to ensure that land, which crosses our boundaries, is monitored so that the statutory limits are not exceeded.

2.20 Provisional Statements

Developers may wish to apply to this Council for provisional statements before entering into a contract to buy or lease property or land to judge whether a development is worth taking forward in light of the need to obtain a premises licence. There is no need for the applicant to hold an operating licence in order to apply for a provisional statement.

Section 204 of the Gambling Act provides for a person to make an application to the Council for a provisional statement in respect of premises that he or she:

- expects to be constructed;
- expects to be altered; or
- expects to acquire a right to occupy.

The process for considering an application for a provisional statement is the same as that for a premises licence application. The applicant is obliged to give notice of the application in the same way as applying for a premises licence. Responsible authorities and interested parties may make representations and there are rights of appeal.

In contrast to the premises licence application, the applicant does not have to hold or have applied for an operating licence from the Gambling Commission (except in the case of a track) and they do not have to have a right to occupy the premises in respect of which their provisional application is made.

The holder of a provisional statement may then apply for a premises licence once the premises are constructed, altered or acquired. The Council will be constrained in the matters it can consider when determining the premises licence application, and in terms of representations about premises licence applications that follow the grant of a provisional statement, no further representations from relevant authorities or interested parties can be taken into account unless:

- they concern matters which could not have been addressed at the provisional statement stage; or
- they reflect a change in the applicant's circumstances.

In addition, the Council may refuse the premises licence (or grant it on terms different to those attached to the provisional statement) only by reference to matters:

- which could not have been raised by objectors at the provisional statement stage;
- which in the Council's opinion reflect a change in the operator's circumstances; or
- where the premises have not been constructed in accordance with the plan submitted with the application. This must be a substantial change to the plan and this Council notes that it can discuss any concerns it has with the applicant before making a decision.

3. Permits/Temporary And Occasional Use Notices

These forms of authorisations are as follows;

- Unlicensed Family Entertainment Centres (uFEC) Permits
- Prize Gaming Permits
- Licensed Premises Gaming Machine Permits
- Club Gaming Permits
- Club Gaming Machine Permits
- Temporary Use Notices (TUNs)
- Occasional Use Notices (OUNs)

A table setting out gaming machine entitlement is attached at Appendix D.

3.1 Unlicensed Family Entertainment Centre Gaming Machine Permits

Only premises that are wholly or mainly used for making gaming machines available may hold an Unlicensed Family Entertainment Centre. As a result, it is generally not permissible for such premises to correspond to an entire shopping centre, airport, motorway service station or similar. Typically, the machines will be in a designated enclosed area and clearly defined when making an application to the Council.

Where a premise does not hold a Premises Licence but wishes to provide category D gaming machines, it may apply to the Council for this permit.

It should be noted that the applicant must show that the premises will be wholly or mainly used for making gaming machines available for use and would, therefore, exclude any premises primarily used for any other purposes, e.g. canteens, fast food takeaways, leisure centres, garages and petrol filling stations, taxi offices.

An application for a permit may be granted only if the Council is satisfied that the premises will be used as an unlicensed Family Entertainment Centre and the Chief Officer of Police has been consulted on the application.

The Council will expect the applicant to show that there are policies and procedures in place to protect children from harm. Harm in this context is not limited to harm from gambling but includes wider child protection considerations. The efficiency of such policies and procedures will each be considered on their merits. However, they may include appropriate measures/training for staff as regards suspected truant school children on the premises, measures/training covering how staff would deal with unsupervised very young children being on the premises, or children causing perceived problems on/around the premises.

This Council will also expect, as per Gambling Commission Guidance, that applicants demonstrate:-

- A full understanding of the maximum stakes and prizes of the gambling that is permissible in unlicensed Family Entertainment Centres;
- That the applicant has no relevant convictions (those that are set out in Schedule 7 of the Act);
- That staff are trained to have a full understanding of the maximum stakes and prizes.

It should be noted that the Council cannot attach conditions to this type of permit.

3.2 (Alcohol) Licensed Premises Gaming Machine Permits

There is provision in the Act for premises licensed to sell alcohol for consumption on the premises, to automatically have 2 gaming machines, of categories C and/or D. The premises merely need to notify the licensing authority. The Council can remove the automatic authorisation in respect of any particular premises if:

- Provision of the machines is not reasonably consistent with the pursuit of the licensing objectives;
- Gaming has taken place on the premises that breaches a condition of Section 282 of the Gambling Act (i.e. that written notice has been provided to the licensing authority, that a fee has been provided and that any relevant code of practice issued by the Gambling Commission about the location and operation of the machine has been complied with);
- The premises are mainly used for gaming; or
- An offence under the Gambling Act has been committed on the premises.

If a premises wishes to have more than 2 machines, then an application for a permit must be submitted and the Council must consider that application based upon the licensing objectives, any guidance and codes of practice issued by the Gambling Commission and "*such matters as the Council think relevant*." The Council considers that "such matters" will be decided on a case by case basis but generally there will be regard to the need to protect children and vulnerable persons from harm or being exploited by gambling and will expect the applicant to satisfy the Council that there will be sufficient measures to ensure that under 18 year olds do not have access to the adult only gaming machines. Measures which will satisfy the Council that there will be no access may include the adult machines being in sight of the bar, or in the sight of staff who will monitor that the machines are not being used by those under 18. Notices and signage may also be of help. As regards the protection of vulnerable persons, applicants may wish to consider the provision of information leaflets/helpline numbers for organisations such as GamCare.

It is recognised that some alcohol licensed premises may apply for a premises licence for their non-alcohol licensed areas. Any such application would most likely need to be applied for, and dealt with as an Adult Gaming Centre premises licence.

It should be noted that the Council can decide to grant the application with a smaller number of machines and/or a different category of machines than that applied for. Conditions (other than these) cannot be attached.

It should also be noted that the holder of a permit must comply with any Code of Practice issued by the Gambling Commission about the location and operation of the machine.

3.3 Prize Gaming Permits

The Council has the right in accordance with this 'Statement of Principles' to specify matters that this authority propose to consider in determining the suitability of the applicant for a permit.

It also specifies that the applicant should set out the types of gaming that he or she is intending to offer and that the applicant should be able to demonstrate:-

- That they understand the limits to stakes and prizes that are set out in Regulations;
- And that the gaming offered is within the law;
- Clear policies that outline the steps to be taken to protect children from harm.

In making its decision on an application for this permit the licensing authority does not need to have regard to the licensing objectives but must have regard to any Gambling Commission guidance.

It should be noted that there are conditions in the Gambling Act 2005 by which the permit holder must comply, but that the licensing authority cannot attach conditions. The conditions in the Act are:-

- The limits on participation fees, as set out in regulations, must be complied with;
- All chances to participate in the gaming must be allocated on the premises on which the gaming is taking place and on one day; the game must be played and completed on the day the chances are allocated; and the result of the game must be made public in the premises on the day that it is played;
- The prize for which the game is played must not exceed the amount set out in regulations (if a money prize), or the prescribed value (if non-monetary prize); and
- Participation in the gaming must not entitle the player to take part in any other gambling.

3.4 Club Gaming and Club Machines Permits

Members Clubs and Miners' Welfare Institutes (but not Commercial Clubs) may apply for a Club Gaming Permit or a Club Gaming Machines Permit. The Club Gaming Permit will enable the premises to provide gaming machines (3 machines of categories B, C or D), equal chance gaming and games of chance. Members Clubs and Miners' Institutes and also Commercial Clubs may apply for a Club Machine Permit. A Club Gaming Machine Permit will enable the premises to provide gaming machines (3 machines of categories B, C or D). Commercial Clubs may not site category B3A gaming machines offering lottery games in their club.

The Council has to satisfy itself that the club meets the requirements of the Act to obtain a club gaming permit. In doing so it will take into account a number of matters as outlined in the Gambling Commission's Guidance. These include the constitution of the club, the frequency of gaming, and ensuring that there are more than 25 members.

The club must be conducted "wholly or mainly" for purposes other than gaming, unless the gaming is permitted by separate regulations. The Secretary of State has made regulations and these cover bridge and whist clubs.

The Council may only refuse an application on the grounds that:

(a) The applicant does not fulfil the requirements for a members' or commercial club or miners' welfare institute and therefore is not entitled to receive the type of permit for which it has applied;
(b) The applicant's premises are used wholly or mainly by children and/or young persons;
(c) An offence under the Act or a breach of a permit has been committed by the applicant while providing gaming facilities;
(d) A permit held by the applicant has been cancelled in the previous ten years; or
(e) An objection has been lodged by the Commission or the police.

There is also a 'fast-track' procedure available under the Act for premises which hold a Club Premises Certificate under the Licensing Act 2003 (Schedule 12 paragraph 10). Commercial clubs cannot hold Club Premises Certificates under the Licensing Act 2003 and so cannot use the fast track procedure. As the Gambling Commission's Guidance for local authorities states: "Under the fast-track procedure there is no opportunity for objections to be made by the Commission or the police, and the grounds upon which an authority can refuse a permit are reduced." and "The grounds on which an application under the process may be refused are:

(a) That the club is established primarily for gaming, other than gaming prescribed under schedule 12;
(b) That in addition to the prescribed gaming, the applicant provides facilities for other gaming; or
(c) That a club gaming permit or club machine permit issued to the applicant in the last ten years has been cancelled."

There are statutory conditions on club gaming permits that no child uses a category B or C machine on the premises and that the holder complies with any relevant provision of a code of practice about the location and operation of gaming machines.

3.5 Temporary Use Notices

Temporary Use Notices allow the use of premises for gambling where there is no premises licence but where a gambling operator wishes to use the premises temporarily for providing facilities for gambling. Premises that might be suitable for a Temporary Use Notice, according to the Gambling Commission, would include hotels, conference centres and sporting venues.

The Council can only grant a Temporary Use Notice to a person or company holding a relevant operating licence, i.e. a non-remote casino operating licence.

The Secretary of State has the power to determine what form of gambling can be authorised by Temporary Use Notices. The Gambling Act 2005 (Temporary Use Notices) Regulations 2007) state that Temporary Use Notices can only be used to permit the provision of facilities or equal chance gaming, where the

gaming is intended to produce a single winner, which in practice means poker tournaments.

There are a number of statutory limits as regards temporary use notices. The meaning of "premises" in part 8 of the Act is discussed in the Gambling Commission Guidance. As with "premises", the definition of "a set of premises" will be a question of fact in the particular circumstances of each notice that is given. In the Act "premises" is defined as including "any place". In considering whether a place falls within the definition of "a set of premises", the Council needs to look at, amongst other things, the ownership/occupation and control of the premises.

This Council expects to object to notices where it appears that their effect would be to permit regular gambling in a place that could be described as one set of premises; as recommended by the Gambling Commission's Guidance to licensing authorities.

3.6 Occasional Use Notices

Where there is betting on a track on 8 days or fewer in a calendar year, betting may be permitted by an occasional use notice (OUN)without the need for a full premises licence. The intention behind OUNs is to permit licensed betting operators with appropriate permission from the Commission, to use tracks for short periods for conducting betting, where the event upon which the betting is to take place is of a temporary, infrequent nature (the OUN dispenses with the need for a betting premises licence for the track in these circumstances).

Non-commercial, fundraising race nights can be run as betting events at sporting venues under the authority of an OUN, whether or not the sporting event on which the bets are taken is held at that venue. The sporting event on which the bets are or will be taken also need not be taking place at the same time as the betting under the OUN.

The Council has very little discretion as regards these notices aside from ensuring that the statutory limit of 8 days in a calendar year is not exceeded. The Council will though consider the definition of a 'track' and whether the applicant is permitted to avail him/herself of the notice.

4. Small Society Lotteries

The Gambling Act 2005 sets out a definition of a lottery, detailed below, and provides that promoting or facilitating a lottery is illegal, unless it falls into one of two categories of permitted lottery, namely:

- licensed lotteries – these are large society lotteries and lotteries run for the benefit of local authorities that are regulated by the Commission and require operating licences;

- exempt lotteries – there are four types of exempt lottery that are expressly permitted under Schedule 11 of the Act, including the small society lottery.

A lottery is any arrangement that satisfies all of the criteria contained within the statutory description of either a simple lottery or a complex lottery, in accordance with section 14 of the Act.

A 'society' is the society, or any separate branch of such a society, on whose behalf a lottery is to be promoted, and has been established as a non-commercial organisation. Section 19 of the Act defines a society as such if it is established and conducted:

- for charitable purposes, as defined in section 2 of the Charities Act 2006;
- for the purpose of enabling participation in, or of supporting, sport, athletics or a cultural activity;
- for any other non-commercial purpose other than that of private gain.

The society must have been established for one of the permitted purposes as set out in section 19 of the Act, and that the proceeds of any lottery must be devoted to those purposes. It is not permissible to establish a society whose sole purpose is to facilitate lotteries.

Local authorities are entitled to operate their own lotteries, but may only do so if licensed by the Gambling Commission. Local authorities must commit a minimum of 20% of the proceeds from such lotteries for a purpose for which they have power to incur expenditure, and must also adhere to the other relevant provisions in the Act. They may also need to hold a remote gambling operating licence, in the event that they wish to sell lottery tickets via electronic or other remote technological methods such as over the telephone, email or via the internet.

Applications for small society lottery registrations must be in the form prescribed by the Secretary of State and must be accompanied by a registration fee and a copy of the terms and conditions and the constitution to prove that they are a non-commercial society. Paragraphs 47 and 48 of Schedule 11 of the Act set out the grounds for licensing authorities to refuse a small society lottery registration application, whilst Paragraph 50 allows a Licensing Authority to revoke an existing small society registration in cases where they think that they would be obliged or permitted to refuse an application for the registration were it being made anew.

The Council will adopt a risk based approach towards its enforcement responsibilities for small society lotteries. The Council considers that the following list, although not exclusive, could affect the risk status of the operator:

- submission of late returns (returns must be submitted no later than three months after the date on which the lottery draw was held)

- submission of incomplete or incorrect returns
- breaches of the limits for small society lotteries
- Conviction(s) for relevant offences as detailed in Schedule 7 of the Gambling Act 2005.

Non-commercial gaming is permitted if it takes place at a non-commercial event, either as an incidental or principal activity at the event. Events are non-commercial if no part of the proceeds is for private profit or gain. The proceeds of such events may benefit one or more individuals if the activity is organised:

- by, or on behalf of, a charity or for charitable purposes
- to enable participation in, or support of, sporting, athletic or cultural activities.

Charities and community groups should contact the Council via e-mail to licensing@monmouthshire.gov.uk or by letter at Licensing Section, Monmouthshire County Council, Abergavenny Community Education Centre, Old Hereford Road, Abergavenny NP7 6EL to register the lottery and to provide proof the collection is for charitable purposes, to support sporting, athletic or cultural activities. Guidance on the usage and types of lotteries is provided by the Gambling Commission.

5. Decision Making

5.1 Administration, Exercise and Delegation of Functions

The powers and duties of the Council under the Act may be carried out by the Licensing Committee, by a Sub-Committee or by one or more officers acting under delegated authority.

It is considered that many of the functions will be largely administrative in nature with no perceived areas of contention. In the interests of efficiency and cost effectiveness these will, for the most part, be carried out by officers.

The following schedule sets out the recommended delegation of functions and decisions by guidance. The Council may, nevertheless, refer any matter to the Licensing Committee or Sub-Committee.

The schedule of delegation of licensing functions is attached at Appendix B.

5.2 Appeals Procedure

Entitlements to appeal for parties aggrieved by decisions of the Council are set out in Sections 206 to 209 of the 2005 Act. Appeals must be made to the Magistrates Court for the area in which the licensing authority, which has considered the application, is situated.

An appeal has to be commenced by giving notice of the appeal by the appellant to; The Clerk to the Justices, Gwent Magistrates Court, The Law Courts, Faulkner Road, Newport, NP20 4PR, within a period of 21 days, beginning with the day on which the appellant was notified by the Council of the decision to be appealed against.

On determining an appeal, the Court may:

- Dismiss the appeal;
- Substitute the decision appealed against with any other decision that could have been made by the licensing authority;
- Remit the case to the licensing authority to dispose of the appeal in accordance with the direction of the Court.
- Make an order about costs.

5.3 Giving Reasons for Decisions

In anticipation of such appeals, the Council will give comprehensive reasons for its decisions. The Council will address the extent to which decisions have been made with regard to any relevant codes of practice and guidance issued by the Gambling Commission, reasonably consistent with the licensing objectives and in accordance with this Policy Statement.

5.4 Implementing the Determination of The Magistrates' Court

As soon as the decision of the Magistrates' Court has been notified to all parties, the Council will not delay its implementation and necessary action will be taken forthwith unless ordered by a higher court to suspend such action (for example, as a result of an ongoing judicial review). The Act provides for no other appeal against the determination of the Magistrates' Court.

5.5 Complaints against Licensed Premises

The Council will investigate complaints against licensed premises in relation to matters relating to the licensing objectives for which it has responsibility. In the first instance, complainants are encouraged to raise the complaint directly with the licence holder or business concerned to seek a local resolution.

Where an interested party has made either a valid representation about licensed premises or a valid application for a licence to be reviewed, the Council may initially arrange a conciliation meeting to address and clarify the issues of concern.

This process will not override the right of any interested party to ask that the Licensing and Gambling Sub-Committee consider their valid objections, or for any licence holder to decline to participate in a conciliation meeting.

Due consideration will be given to all relevant representations unless they fit the exceptions in 5.6 below.

5.6 Reviews

Requests for a review can be made by Interested Parties or Responsible Authorities. However, it is for the Council to decide whether the review is to be carried out based upon any relevant codes of practice and guidance issued by the Gambling Commission, reasonably consistent with the licensing objectives and in accordance with this Policy Statement.

The request for the review will also be subject to the consideration by the Council as to whether it is frivolous, vexatious, or whether it will not cause this Council to alter/revoke/suspend the licence, or whether it is substantially the same as previous representations or requests for review.

The Council can also initiate a review of a particular premises licence, or a particular class of premises licence on the basis of any reason, which it thinks is appropriate.

Once a valid application for a review has been received by the Council, representations can be made by responsible authorities and interested parties during a 28 day period. This period begins 7 days after the application was received by the Council, who will publish notice of the application within 7 days of receipt.

The Council must carry out the review as soon as possible after the 28 day period for making representations has passed.

The purpose of the review will be to determine whether the Council should take any action in relation to the licence. If action is justified, the options open to the Council are:-

- add, remove or amend a licence condition imposed by the Council;
- exclude a default condition imposed by the Secretary of State (e.g. opening hours) or remove or amend such an exclusion;
- suspend the premises licence for a period not exceeding three months; and
- revoke the premises licence.

In determining what action, if any, should be taken following a review, the Council must have regard to the principles set out in Section 153 of the Act, as well as any relevant representations.

In particular, the Council may also initiate a review of a premises licence on the grounds that a premises licence holder has not provided facilities for gambling at the premises. This is to prevent people from applying for licences in a speculative manner without intending to use them.

Once the review has been completed, the Council must, as soon as possible, notify its decision to:

- the licence holder;
- the applicant for review (if any);
- the Commission;
- any person who made representations;
- the chief officer of police or chief constable; and
- Her Majesty's Commissioners for Revenue and Customs.

6. Licensing Conditions and Codes of Practice 2024 (LCCP)

The Gambling Act 2005 requires the Gambling Commission to issue one or more codes of practice about the manner in which facilities for gambling are provided. The codes may be directed at the holders of operating or personal licences, or any other person involved in providing facilities for gambling.

The Act also requires licensing authorities to take into account when exercising their functions, any relevant code of practice issued by the Commission under section 24, in this case:-

- The Commission's *Licence conditions and codes of practice* (LCCP), which apply to holders of Gambling Commission operating or personal licences;
- Other codes - these are the Commission's code of practice for equal chance gaming and its code of practice for gaming machines in clubs and premises with an alcohol licence

The LCCP contains two types of code provision:

Social responsibility code provisions

These are provisions describing arrangements which should be made by persons providing facilities for gambling for the purpose of:-

(a) ensuring that gambling is conducted in a fair and open way;
(b) protecting children and other vulnerable persons form being harmed or exploited by gambling; and
(c) making assistance available to persons who are or may be affected by problems related to gambling.

Compliance with these is a condition of operator licences; therefore any breach of them by a licensed operator may lead the Commission to review the operator's licence with a view to suspension, revocation or the imposition of a financial penalty and would also expose the operator to the risk of prosecution; these provisions are in shaded boxes in the remainder of this document.

Ordinary code provisions

These do not have the status of licence conditions in the case of licensed operators, but set out good practice; these code provisions are in the unshaded boxes in this document.
Codes of practice are admissible in evidence in criminal or civil proceedings and must be taken into account in any case in which the court or tribunal think them relevant, and by the Commission in the exercise of its functions; any departure from code provisions by an operator may be taken into account by the Commission, for example on a licence review (but could not lead to imposition of a financial penalty).

However, the Commission has made it clear that licensed operators may adopt alternative approaches to those set out if they have actively taken account of the provision and can demonstrate that an alternative approach is reasonable in the particular circumstances; or that to take an alternative approach would be acting in a similarly effective manner.

Risk Assessments - Premises

The LCCP requires all existing licensees that provide gambling at their premises to assess the local risks to the licensing objectives and have policies, procedures and control measures to reduce those risks. Licensees must take into account any relevant matters identified in the licensing authorities (gambling) Statement of Policy when making their risk assessments.

A local risk assessment should also be undertaken or updated by a licensee, when applying for:-

- A new premises licence;
- When applying for a variation of an existing premises licence;
- To take into account any local significant changes in the local area;
- When there are significant changes within their premises that may affect the existing local risk assessment.

Operators are required to make the risk assessment available to licensing authorities when an application is submitted and a copy should be kept at the premises or otherwise on request, and this will form part of the Council's inspection regime or investigating complaints.

The code requires the Council to set out matters they expect the operator to take account of in the risk assessment in its statement of policy and this council expects the following matters to be considered by operators when making their risk assessment.

- Information held by the licensee regarding self-exclusions and incidences of underage gambling,
- Gaming trends that may reflect benefit payments

- Arrangement for localised exchange of information regarding self-exclusions and gaming trends.
- Urban setting such as proximity to schools, commercial environment, factors affecting footfall,
- Range of facilities in proximity to the licensed premises such as other gambling outlets, banks, post offices, refreshment and entertainment type facilities
- Known problems in the area such as problems arising from street drinkers, youths participating in anti-social behaviour, drug dealing activities, etc.

Betting Track Premises – The Gambling Commission states within it's LCCP code that Operators are required to make a risk assessment. However, Betting Track Premises are not required to seek an Operators Licence with the Gambling Commission and as such are not required to conduct a risk assessment. However, in the interest of the objectives of the Gambling Act 2003, namely i) preventing gambling being a source of crime or disorder, being associated with crime or disorder or being used to support crime; ii) ensuring that gambling is conducted in a fair and open way; iii) protecting children and other vulnerable persons from being harmed or exploited by gambling, this Council would expect a Betting Track Premises to conduct a risk assessment for their premises.

The council expects the following matters to be considered by operators when making their risk assessment.

Matters relating to children and young persons, including;

- Institutions, places or areas where presence of children and young persons should be expected such as schools, youth clubs, parks, playgrounds and entertainment venues such as bowling allies, cinemas etc.;
- Any premises where children congregate including bus stops, café's, shops, and any other place where children are attracted;
- Areas that are prone to issues of youths participating in anti social behaviour, including such activities as graffiti/tagging, underage drinking, etc.;
- Recorded incidents of attempted underage gambling.

Matters relating to vulnerable adults, including;

- Information held by the licensee regarding self-exclusions and incidences of underage gambling;
- Gaming trends that may mirror days for financial payments such as pay days or benefit payments;
- Arrangement for localised exchange of information regarding self-exclusions and gaming trends;
- Proximity of premises which may be frequented by vulnerable people such as hospitals, residential care homes, medical facilities, doctor's

surgeries, council housing offices, addiction clinics or help centres, places where alcohol or drug dependant people may congregate, etc. The consideration of the location of alcohol licensed premises will also be a key consideration for gambling licence applications.

Other issues that may be considered could include;

- Matters of faith, including all religious or faith denominations including proximity to churches, mosques, temples or any other place of worship.
- the economic make-up of an area;
- the surrounding night-time economy;
- children's homes and care facilities;
- the area footfall eg. residential or commercial areas;
- banks and ATM nearby;
- known anti-social behaviour issues;
- housing facilities;
- job centres;
- hostel and support services for the homeless;
- alcohol and drug support facilities;
- pawn brokers and payday loan businesses;
- other gambling premises;
- If there is an existing cluster of gambling premises
- mental health facilities;
- community buildings;
- residential care establishments;
- transport and parking facilities eg. bus stops, taxi ranks, train stations;
- presences of rough sleepers;
- unemployment rates for area;
- types and rates of crime in the area that could impact on the premises
- areas with significant areas of children, eg parks and playgrounds.

This list is not exhaustive and other factors not in this list that are identified must be taken into consideration.

Significant changes to the premises

From time to time operators will undertake a refresh of the premises' layout and décor, which is unlikely to prompt a review of the risk assessment for that premises. However, where there is a significant change at the premises that may affect the mitigation of local risks, then an operator must review its risk assessment and if necessary update it, taking into account the change and how it may affect one or more of the licensing objectives.
It is expected that gambling operators will undertake this risk assessment process as a matter of course for any premises refit, changes to layout or internal control measures. If any changes do require a review of the risk assessments for that premises gambling operators should ensure that they have a system in place to record and action any measures identified in that review.

The gambling operator will be responsible for identifying when a significant change to the premises has occurred. In order to assist gambling operators the Council has provided the following list of examples of what could be classified as a significant change to the premises (some of which may also require a variation to the existing premises licence).

- Any building work or premises refit where gambling facilities are relocated within the premises.
- The premises licence is transferred to a new operator who will operate the premises with its own procedures and policies which are different to those of the previous licensee.
- Any change to the operator's internal policies which as a result requires additional or changes to existing control measures; and/or staff will require retraining on those policy changes.
- The entrance or entrances to the premises are changed, for example, the door materials are changed from metal with glazing to a full glass door or doors are reallocated from egress to ingress or vice versa.
- New gambling facilities are made available on the premises which were not provided previously, for example, bet in play, handheld gaming devices for customers, Self Service Betting Terminals, or a different category of gaming machine is provided.
- The premises operator makes an application for a licence at that premises to provide an activity under a different regulatory regime, for example, to permit the sale of alcohol.

As with the examples of significant changes in local circumstances, the list above is not an exhaustive list of significant changes to premises.

The Council will not, as general practice, request a copy of the reviewed risk assessment if a significant change to the licensed premises has occurred, unless the change is one that will necessitate a variation application.

Variation of the premises licence

Variations to premises licences are only those required to be made under section 187 of the Act and will not include changes of circumstances such as a change of premises' name or a change of licensee's address, etc.

The Commissions LCCP social responsibility code provision 10.1.1 requires that gambling operators must undertake a review of the local risk assessment and update it if necessary when preparing an application to vary the premises licence. Operators submitting a variation application to the Council may consider submitting a copy of the reviewed local risk assessment when submitting the application. This will then negate the need for the Council requesting to see a copy of this risk assessment and could potentially reduce the likelihood of a representation being made to the application.

If an operator wishes to vary a converted casino premises licence from one premises to another then the gambling operator should consider producing a

new risk assessment for that premises. It is advisable that a copy of that assessment is submitted to the Council with the application form.

Regular review of risk assessment

As a matter of best practice the Council recommends that operators establish a regular review regime in respect of their local risk assessments. This review programme can be carried out alongside other reviews on Health and Safety risk assessments for the premises. This review programme would ensure that, regardless of whether or not any of the trigger events set out above have occurred, these risk assessments are considered at regular intervals and updated if necessary.

It will be up to the gambling operator as to the frequency of these reviews but it is recommended that no more than three years should pass before these assessments are reviewed. Operators may wish to synchronise their reviews of the local risk assessments with the publication of the Council's Statement of Licensing Principles for Gambling. This would enable gambling operators to consider the Local Area Profile, which has been published in the Council's Statement of Licensing Principles for Gambling.

Local risks and control measures

There are two specific parts to the risk assessment process:

- the assessment of the local risks
- the determination of appropriate mitigation to reduce those risks

The risks that operators must identify relate to the potential impact a gambling premises and its operation may have on the licensing objectives. Gambling operator should identify and list all of the local risks within the assessment that they have identified. The level of such risks can range from being low to very high depending on the potential impact that the gambling operator has assessed it to have on the licensing objectives. The level of any given risk will have a direct impact on the type and extent of the control measures that the gambling operators deems as being necessary to mitigate such risk.

Operators will already be assessing locations when looking for new sites or when reviewing the performance of their premises. The design of premises is also assessed to ensure that they will meet the needs of the gambling operation, will provide protection for staff and customers; and will have facilities for recording crime. Operators will also have implemented policies and procedures for the operation of premises in line with statutory and other regulatory requirements placed upon them by the Commission and other agencies.

Operators will already be familiar with identifying risks in relation to health and safety and food hygiene legislation. Risk assessments are also used for security and crime purposes, for example for money laundering and as part of trade association best practice, such as the Safe Bet Alliance.

This local risk assessment process, although similar requires a much broader range of considerations when identifying local risk. The requirement of the Commissions LCCP social responsibility code provision 10.1.1 is that gambling operators consider the local area in which the premises are situated and the impact that the premises operation may have on the licensing objectives.

Local area risks

There are a number of factors relating to the local area that operators may consider which is independent of who the operator believes is their target market. It will be for the gambling operator to identify these risks. However, there may be occasions that the Commission or the Council will provide information on what they perceive as being a local risk. This may be specified in the Statement of Licensing Policy or in a separate guidance document, both of which will be found on the Council's website.

The local area will be different depending on the premises and the size of its operation. For example a large Bingo hall may have a wider catchment area than a neighbourhood betting shop as the Bingo hall attracts customers from further afield.

Risk Assessment

Although gambling is a legal entertainment activity it can, in some locations, have a negative impact on individuals and the wider community. The consideration of the proximity of gambling premises to locations where groups vulnerable to problematic gambling may congregate, e.g. schools, alcohol services, supported housing, will be a priority for the applicant and licensing authority. Monmouthshire Public Service Board has produced a Wellbeing Assessment as part of the Wellbeing of Future Generations Act. The Assessment considers Economic, Social, Environmental and Cultural Wellbeing in the county as a whole whilst also focusing on 5 areas based around : Abergavenny, Monmouth, Chepstow, Caldicot and Central Monmouthshire.

Full details can be found on http://www.monmouthshire.gov.uk/our-monmouthshire
Crime data for local area can be obtained from www.gwent.police.uk

Gambling operational risks

The gambling operation relates to how the premises will be or is run. This will include the operator's policies and procedures which have been put in place to meet the requirements of the business, the Act and/or specific code provisions within the LCCP.

Gambling operators should identify operational risks in the local area to the licensing objectives and then consider whether there are control measures in excess of those already in place that would mitigate the risk. For example if

there is a known illegal drug use in the local area the gambling operator may consider using control measures such as maglocks on the toilet doors or change the design to the toilet to deter people from using it for illegal drug use. It is likely that the identification of risks associated with this element of the assessment will be very similar for all premises with slight variations depending on any specific factors that relate to the premises or the local area.

The control measures that operators will put in place to mitigate any risk associated with the gambling operation will be dependent on the type of gambling activities provided, how the company operates and the size of the organisation.

Premises design risks

The design of the premises is an extremely important factor when considering local risks. For example, an Adult Gaming Centre which is located within an area which has a high number of children and young people present throughout the day may identify that the doors on either side of the premises are being used by local children as a short cut to access the adjacent street. The appropriate mitigation in this case may be that the gambling operator closes off one of the doors to prevent it being used as a short cut.

As part of the design process, the layout of the premises is a major consideration as poorly conceived design may create significant risks to one or more of the licensing objectives. Gambling operators are experienced in premises design and often these considerations are made during the planning phase. It is advisable that gambling operators ensure that there is a process in place to record these key decisions at an early stage of the planning process for the premises design so that this can be included in their risk assessment.

Interior design risks

The internal design and layout will reflect the premises operation and the type of gambling facilities that it offers. For some premises the design will be subject to certain limitations due to mandatory conditions on the gambling premises licence, such as the distance between gaming tables and other gambling facilities in casinos, and restrictions on the location of ATMs.

Operators should assess the risk presented by the internal layout of the premises and the location of gambling facilities within them. For example, if a gaming machine is placed within the direct line of sight of the cashier counter then staff will be able to monitor player behaviour and undertake interventions if there is a concern over the customers' spending habits. Staff can also monitor the use of the machines and can challenge any customers who are believed to be under the age of 18, or who damage the machines, or who appear to be attempting to launder money. By a simple assessment of the optimum location for these machines, operators can significantly reduce the risk to the licensing objectives.

Exterior design risks

The exterior of premises will be a major advertisement for the gambling operator. However, the design should be assessed based on the associated risk. Operators may identify a risk associated with the design and introduce control measures based on that perceived risk. For example, if the premises have a large amount of glass frontage in an area prone to criminal damage, operators may consider the risk of damage to the standard toughened glass to be high and introduce a control measure such as roller shutters and/or external CCTV cameras.

Control measures

Depending on the nature of the risk factors, the control measures identified to mitigate the perceived risk may be a combination of systems, design and physical measure. Control measures that relate to systems may be measures that have been put in place though policies and procedures. These can either be systems that apply to all of the operator's premises or systems that have been developed specifically for particular premises to deal with a specific local risk factor. System control measures may include staff training, security policies and procedures. They may also relate to having security personnel on entrances, implementing membership criteria and/or providing support to local vulnerable groups through financial or other means.

Design control measures are measures that are built into the design of the premises. These can include the location of gambling facilities and the design and location of cashier counters within the premises, and the exterior design of premises. For example, a control measure for the interior of the premises could involve moving a cashier counter from the rear of the premises to the front of the shop next to the main entrance. An external design control measure may involve the exterior design being tailored to address local risks, for example, more open window displays to enable staff can see out of the premises or a design to avoid attracting children to the premises.

The final control measures relate to specific physical measure that will address an identified risk factor. These physical control measures may, for example, include alarms, CCTV cameras, doors, magnetic locks, time locks on safes, spit kits, window shutters, fogging systems, UV lights in toilets.

The control measures identified to mitigate a perceived risk may involve a combination of systems, design and physical measures. For example to address the risk factors relating to children gaining access to an over 18 restricted gambling premises, the operator may identify the following control measures:

Systems: PASS card or age verification policies, challenge 21 scheme, staff training and door staff.

Design: Exterior design which will not attract children into the premises, the entrance layout will enable staff and security to watch those entering the premises and challenge them on the grounds of age.
Physical: Magnetic door locks and ID scans.

Step 1: Undertaking a local risk assessment

The risk assessment should be carried out through a step-by-step approach. Gambling operators may first assess the local area and identify the relevant risk factors, then assess the gambling operation, and finally assess the premises design, both internal and external. Once the risk factors have been identified, the control measures to mitigate the risks should be considered. These control measures will either already be in place or will need to be implemented.

- Assessors should start by identify the local risk factors surrounding the premises. The risk factors will differ from location to location so an understanding of the specific characteristics of the local area and the people who live, work or visit that area is important. Use Community wellbeing profile and local knowledge will assist.

Step 2: Gambling operation and physical design

In assessing the risk factors associated with a gambling operation the assessor should take into account the local risks which are commonly accepted by broader stakeholders and how that gambling operation may affect that risk.
The physical design of the premises is a key consideration as this could have a significant impact on the risk to the licensing objectives. In assessing the risk factors associated with the premises design and layout reference is needed to the local area risks factors already identified to ensure the design doesn't add to that risk. The design, both internal and external should be considered and specific risk factors identified and noted.

Step 3: Control measures

Once the risk factors have been identified, the assessor should seek to identify control measures that would mitigate the identified risks. Such control measures will relate to one of the three categories of control measures mentioned above (systems, design and physical). Some risk factors may require a combination of control measures to adequately mitigate the risk.

Step 4: Action Plan

Once the assessment has been carried out an action plan should be completed so that any identified actions are documented and a deadline for completing the required piece of work is set and agreed.

Completed assessment

The control measures must be implemented on the premises and, if applicable,staff on the premises should be trained in their use or trained on the new policy or procedure. The assessment must be retained and should be reviewed whenever a trigger occurs or as part of a regular review regime

7. Further Information

Further information about the Gambling Act 2005, this Statement of Licensing Policy or the application process can be obtained from:

Licensing Section
Monmouthshire County Council
Abergavenny Community Education Centre
Old Hereford Road
Abergavenny
NP7 6EL
Telephone: 01873 735420
Fax: 01633 644878
Email: licensing@monmouthshire.gov.uk
Website: www.monmouthshire.gov.uk/licensing

Information is also available from:

The Gambling Commission
Victoria Square House
Birmingham
B2 4BP
Telephone: 0121 230 6666
Fax: 0121 230 6720
Email: info@gamblingcommission.gov.uk
Website: www.gamblingcommission.gov.uk

The Department for Culture, Media & Sport
100 Parliament Street
London
SW1A 2BQ
Telephone: 020 7211 2210
Email: enquiries@dcms.gov.uk
Website: www.culture.gov.uk

Appendix A Access to Premises

Casinos

- The principal access entrance to the premises must be from a street;
- No entrance to a casino must be from premises that are used wholly or mainly by children and/or young persons;
- No customer must be able to enter a casino directly from any other premises, which holds a gambling premises licence.

Adult Gaming Centre

- No customer must be able to access the premises directly from any other licensed gambling premises.

Betting Shops

- Access must be from a street or from another premises with a betting premises licence;
- No direct access from a betting shop to another premises used for the retail sale of merchandise or services. In effect there cannot be an entrance to a betting shop from a shop of any kind and you could not have a betting shop at the back of a café – the whole area would have to be licensed.

Tracks

No customer should be able to access the premises directly from:

- a casino;
- an adult gaming centre.

Bingo Premises

No customer must be able to access the premises directly from:

- a casino;
- an adult gaming centre;
- a betting premises, other than a track.

Family Entertainment Centre

No customer must be able to access the premises directly from:

- a casino;
- an adult gaming centre;
- a betting premises, other than a track.

Part 7 of the Gambling Commission's Guidance to Licensing Authorities contains further guidance on this issue, which this authority will also take into account in its decision-making.

Appendix B Schedule of Delegation of Licensing Functions and Decisions

Matters to be dealt with	Full Council	Sub-Committee	Officers
Three year Gambling Policy	x		
Policy not to permit casinos	x		
Fee Setting – when appropriate (Fee Setting for Premises Licence be delegated to the Licensing and Regulatory Committee)		x	
Application for Premises Licence		Where representations have been received and not withdrawn	Where no representations received/representations have been withdrawn/authorised to dispense with a hearing if all parties are in agreeance/authorised to assess if a representation is valid.
Application for a variation to a licence		Where representations have been received and not withdrawn	Where no representations received/representations have been withdrawn/authorised to dispense with a hearing if all parties are in agreeance/authorised to assess if a representation is valid.
Application for a transfer of a licence		Where representations have been received from the Commission	Where no representation has been received from the Commission
Application for a provisional statement		Where representations have been received and not withdrawn	Where no representations received/representations have been withdrawn/authorised to

Matters to be dealt with	Full Council	Sub-Committee	Officers
			dispense with a hearing if all parties are in agreeance/authorised to assess if a representation is valid.
Review of a Premises Licence		x	
Revocation of a premises licence for failure to pay annual licence fee			x
Application for club gaming/club machine permits		Where objections have been made (and not withdrawn)	Where no representations received/representations have been withdrawn/authorised to dispense with a hearing if all parties are in agreeance/authorised to assess if a representation is valid.
Cancellation of club gaming/club machine permits		x	
Applications for other permits		Where objections have been made and not withdrawn	Where no representations received/representations have been withdrawn/authorised to dispense with a hearing if all parties are in agreeance/authorised to assess if a representation is valid.
Cancellation of licensed premises gaming machine permits		x	Authorised to cancel a permit, with the holder having the right to a hearing at the Sub-Committee.
Consideration of temporary use notice			Consideration/authorised to dispense with a hearing if all parties are in agreeance/authorised

Matters to be dealt with	Full Council	Sub-Committee	Officers
			to assess if objection is valid.
Decision to give a counter notice to a temporary use notice		x	
Small Society Lotteries		x	Registration, Refusal and revocation of a lottery registration with the applicant/holder having the right to a hearing at the Sub-Committee.

Appendix C Definitions

NOTE: In this Policy, the following definitions are included to provide an explanation to certain terms included in the Act and, therefore, in the Statement of Licensing Policy. In some cases they are an abbreviation of what is stated in the Gambling Act 2005 or an interpretation of those terms. For a full definition of the terms used, the reader must refer to the Gambling Act 2005.

'The Council' means Monmouthshire County Council, acting as the Licensing Authority as defined by the Gambling Act 2005.

'The Act' means the Gambling Act 2005.

'The County' means the County of Monmouthshire.

'The Licensing Authority' the authority in whose area the premises is wholly/partly situated. The Licensing Authority (as in the issuing authority) is also a responsible authority.

'The Gambling Commission' a body set up by the Government as the unified regulator for gambling, replacing the Gaming Board.

'Responsible Authority' means a public body that must be notified of certain applications for premises licences and permits, and are entitled to make representations on any of the licensing objectives.

'Children' means individuals who are less than 16 years old.

'Young person' means individuals who are aged less than 18 years old and 16 years and over.

'Vulnerable person' will not be defined but the assumption is that this group includes people who gamble more than they want to, people who gamble beyond their means, and people who may not be able to make informed or balanced decisions about gambling due to a mental impairment, alcohol or drugs.

'Mandatory Conditions' means a specified condition provided by regulations to be attached to premises licences.

'Default Conditions' means a specified condition provided for by regulations to be attached to a licence unless excluded by the Council.

'Premises' means any place, including a vessel or moveable structure.

'Tracks' means a horse-race course, dog track or other premises on any part of which a race or other sporting event takes place or is intended to take place.

Appendix D Summary of Machine Provisions by Premises

Machine category							
Premises type	**A**	**B1**	**B2**	**B3**	**B4**	**C**	**D**
Large casino (machine/table ratio of 5-1 up to maximum)				Maximum of 150 machines Any combination of machines in categories B to D (except B3A machines), within the total limit of 150 (subject to machine/table ratio)			
Small casino (machine/table ratio of 2-1 up to maximum)				Maximum of 80 machines Any combination of machines in categories B to D (except B3A machines), within the total limit of 80 (subject to machine/table ratio)			
Pre-2005 Act casino (no machine/table ratio)				Maximum of 20 machines categories B to D (except B3A machines), or any number of C or D machines instead			
Betting premises and tracks occupied by pool betting				Maximum of 4 machines categories B2 to D (except B3A machines)			
Bingo premises[1]				Maximum of 20% of the total number of gaming machines which are available for use on the premises categories B3 or B4		No limit on category C or D machines	
Adult gaming centre[2]				Maximum of 20% of the total number of gaming machines which are available for use on the premises categories B3 or B4		No limit on category C or D machines	
Licensed family entertainment centre[3]				No limit on category C or D machines			
Family entertainment centre (with permit) [3]				No limit on category D machines			
Clubs or miners' welfare institute (with permits) [4]				Maximum of 3 machines in categories B3A or B4 to D			
Qualifying alcohol-licensed premises				1 or 2 machines of category C or D automatic upon notification			
Qualifying alcohol-licensed premises (with licensed premises gaming machine permit)				Number of category C-D machines as specified on permit			
Travelling fair				No limit on category D machines			

[1] Bingo premises licence are entitled to make available for use a number of category B gaming machines not exceeding 20% of the total number of gaming machines on the premises. Where a premises licence was granted before 13 July 2011, they are entitled to make available eight (The Gambling Act 2005 (Gaming Machines in Bingo Premises) Order 2009) category B gaming machines, or 20% of the total number of gaming machines, whichever is the greater. Category B machines at bingo premises are restricted to sub-category B3 and B4 machines, but not B3A machines.

[2] Adult gaming centres are entitled to make available for use a number of category B gaming machines not exceeding 20% of the total number of gaming machines which are available for use on the premises and any number of category C or D machines. Where a premises licence was granted before 13 July 2011, they are entitled to make available four category B gaming machines, or 20% of the total number of gaming machines, whichever is the greater. Category B machines at adult gaming centres are restricted to sub-category B3 and B4 machines, but not B3A machines.

[3] Only premises that are wholly or mainly used for making gaming machines available may hold an unlicensed FEC gaming machine permit or an FEC premises licence. Category C machines may only be sited within licensed FECs and where an FEC permit is in force. They must be in a separate area to ensure the segregation and supervision of machines that may only be played by adults. There is no power for the licensing authority to set a limit on the number of machines under the FEC permit.

[4] Members' clubs and miners' welfare institutes with a club gaming permit or with a club machine permit, are entitled to site a total of three machines in categories B3A to D but only one B3A machine can be sited as part of this entitlement.

[5] Commercial clubs with club machine or gaming permits are entitled to a total of three machines in categories B4 to D.

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Integrated Impact Assessment document

(incorporating Equalities, Future Generations, Welsh Language and Socio Economic Duty)

Name of the Officer Linda O'Gorman / Jane Rodgers **Phone no:** 01633 644214 **E-mail:** lindaogorman@monmouthshire.gov.uk	**Please give a brief description of the aims of the proposal** To consider the Council's Gambling Policy and the existing resolution to not permit casinos within the County of Monmouthshire
Name of Service area Licensing	**Date** 4th October 2024

1. **Are your proposals going to affect any people or groups of people with protected characteristics?** Please explain the impact, the evidence you have used and any action you are taking below.

Protected Characteristics	Describe any positive impacts your proposal has on the protected characteristic	Describe any negative impacts your proposal has on the protected characteristic	What has been/will be done to mitigate any negative impacts or better contribute to positive impacts?
Age	Protects children by not 'normalising' gambling		
Disability	Neutral		
Gender reassignment	Neutral		
Marriage or civil partnership	Neutral		
Pregnancy or maternity	Neutral		

Protected Characteristics	Describe any positive impacts your proposal has on the protected characteristic	Describe any negative impacts your proposal has on the protected characteristic	What has been/will be done to mitigate any negative impacts or better contribute to positive impacts?
Race	Neutral		
Religion or Belief	Neutral		
Sex	Neutral		
Sexual Orientation	Neutral		

2. The Socio-economic Duty and Social Justice

The Socio-economic Duty requires public bodies to have due regard to the need to reduce inequalities of outcome which result from socio-economic disadvantage when taking key decisions This duty aligns with our commitment as an authority to Social Justice.

	Describe any positive impacts your proposal has in respect of people suffering socio economic disadvantage	Describe any negative impacts your proposal has in respect of people suffering socio economic disadvantage.	What has been/will be done to mitigate any negative impacts or better contribute to positive impacts?
Socio-economic Duty and Social Justice	The impacts of gambling addiction can include the inability to function at work, and financial problems which can lead to homelessness.		

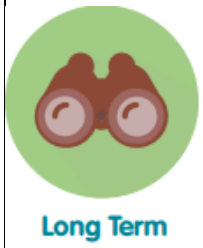
3. Policy making and the Welsh language.

How does your proposal impact on the following aspects of the Council's Welsh Language Standards:	Describe the positive impacts of this proposal	Describe the negative impacts of this proposal	What has been/will be done to mitigate any negative impacts or better contribute to positive impacts
Policy Making Effects on the use of the Welsh language, Promoting Welsh language Treating the Welsh language no less favourably	Neutral		
Operational Recruitment & Training of workforce	N/A		
Service delivery Use of Welsh language in service delivery Promoting use of the language	N/A		

4. Does your proposal deliver any of the well-being goals below? Please explain the impact (positive and negative) you expect, together with suggestions of how to mitigate negative impacts or better contribute to the goal. There's no need to put something in every box if it is not relevant!

Well Being Goal	Does the proposal contribute to this goal? Describe the positive and negative impacts.	What actions have been/will be taken to mitigate any negative impacts or better contribute to positive impacts?
A prosperous Wales Efficient use of resources, skilled, educated people, generates wealth, provides jobs	Generally considered that gambling has a negative impact on the personal wealth of participants.	Would not want to encourage wider scale gambling, as could lead to addiction and financial hardship
A resilient Wales Maintain and enhance biodiversity and land, river and coastal ecosystems that support resilience and can adapt to change (e.g. climate change)	N/A	
A healthier Wales People's physical and mental wellbeing is maximized and health impacts are understood	Could promote excessive gambling, which may impact on those who are vulnerable/addicted to gambling if Casinos are permitted	As Above
A Wales of cohesive communities Communities are attractive, viable, safe and well connected	Larger scale gambling can be problematic and have a negative impact on local communities.	
A globally responsible Wales Taking account of impact on global well-being when considering local social, economic and environmental wellbeing	The proposal has a positive impact by clearly stating casinos will not be permitted in Monmouthshire.	
A Wales of vibrant culture and thriving Welsh language Culture, heritage and Welsh language are promoted and protected. People are encouraged to do sport, art and recreation	N/A	
A more equal Wales People can fulfil their potential no matter what their background or circumstances	The impacts of gambling addiction can lead to financial problems and poverty, which can lead to homelessness.	

5. How has your proposal embedded and prioritised the sustainable governance principles in its development?

Sustainable Development Principle	Does your proposal demonstrate you have met this principle? If yes, describe how. If not explain why.	Are there any additional actions to be taken to mitigate any negative impacts or better contribute to positive impacts?
 Balancing short term need with long term and planning for the future	A resolution not to permit casinos protects vulnerable people from being harmed or exploited by gambling.	
Working together with other partners to deliver objectives	N/A	
Involving those with an interest and seeking their views	Gambling addiction is well documented.	
Putting resources into preventing problems occurring or getting worse	By preventing a casino coming to Monmouthshire protects some of our more vulnerable members of society.	

Sustainable Development Principle	Does your proposal demonstrate you have met this principle? If yes, describe how. If not explain why.	Are there any additional actions to be taken to mitigate any negative impacts or better contribute to positive impacts?
Considering impact on all wellbeing goals together and on other bodies	As above.	

6. **Council has agreed the need to consider the impact its decisions has on the following important responsibilities: Corporate Parenting and Safeguarding. Are your proposals going to affect any of these responsibilities?**

	Describe any positive impacts your proposal has	**Describe any negative impacts your proposal has**	**What will you do/ have you done to mitigate any negative impacts or better contribute to positive impacts?**
Safeguarding	The resolution to not permit a casino contributes positively to protecting children		
Corporate Parenting			

7. **What evidence and data has informed the development of your proposal?**

In their joint report on the 'True Cost of Gambling' – Published 29 January 2019, Public Health Wales and Bangor University highlighted that as well as affecting children and young people, gambling-related harm disproportionately affects certain socio-economic groups, which exacerbates existing inequalities. The report stated that population groups at greater risk of experiencing problem gambling and/or gambling related harms include:

- Children, either because of their own gambling or because of parental or carer gambling.
- Individuals living in most deprived areas, with problem gambling being over seven times higher compared to individuals living in least deprived areas.
- Those with constrained economic circumstances due to unemployment, underemployment, financial difficulties and debt.

The proposed Statement of Gambling Policy sets out how the Council will discharge their functions under the objectives under the Gambling Act 2005 regarding the following.

- Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime,
- Ensuring that gambling is conducted in a fair and open way, and
- Protecting children and other vulnerable persons from being harmed or exploited by gambling.

Regard has been given to the joint report from Public Health Wales and Bango University report above when requesting the resolution to retain within the proposed policy not to permit casinos within the County of Monmouthshire.

8. **SUMMARY: As a result of completing this form, what are the main positive and negative impacts of your proposal, how have they informed/changed the development of the proposal so far and what will you be doing in future?**

Continuing the existing resolution not to permit casinos in the County has a positive impact by protecting children and other vulnerable persons from being harmed or exploited by gambling

9. ACTIONS: As a result of completing this form are there any further actions you will be undertaking? Please detail them below, if applicable.

What are you going to do	When are you going to do it?	Who is responsible
Incorporate resolution into the Authority's Gambling Policy 2025.	By 31/1/2025	

10. VERSION CONTROL: The Equality and Future Generations Evaluation should be used at the earliest stage, such as informally within your service, and then further developed throughout the decision making process. It is important to keep a record of this process to demonstrate how you have considered and built in equality and future generations considerations wherever possible.

Version No.	Decision making stage	Date considered	Brief description of any amendments made following consideration
	Full Council	24/10/2024	
	Publication of Gambling Policy	03/01/2025	
	Commencement of Gambling Policy	31/01/2025	

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SUBJECT:	**Annual Report of the Standards Committee for 2023/24**
MEETING:	**Council**
DATE:	**24th October 2024**
DIVISION/WARDS AFFECTED:	**All**

1. PURPOSE

To present the 2023/24 annual report of the Council's Standards Committee.

2. RECOMMENDATION

That Council notes the Annual Report of the Standards Committee at Appendix 1.

3. INTRODUCTION

3.1 The Standards Committee is required by Section 63 of the Local Government and Elections (Wales) Act 2021 ("LGE 2021") to make an annual report to their authority.

3.2 Section 63 LGE 2021 prescribes the content of the annual report as set out below.

4. DISCHARGE OF THE COMMITTEE'S FUNCTIONS

4.1 The Standards Committee is composed of nine members: three County Councillors, one community member and five independent members.

4.2 The Committee met twice in 2023/24 - on Monday 12th June 2023 and on Monday 9th October 2023.

4.3 The functions of the Committee are defined in sections 54 and 56 of the Local Government Act 2000 ("LGA 2000"). The primary function is to

promote and maintain high standards of conduct by the members and co- opted members of the authority, and by the members of community councils in Monmouthshire.

5. REPORTS AND RECOMMENDATIONS FROM THE PUBLIC SERVICES OMBUDSMAN FOR WALES (PSOW)

5.1 The Standards Committee received one report from the Public Services Ombudsman for Wales ("PSOW") during the year 2023/24 following an investigation into allegations that a member of Llantilio Petholey Community Council had breached their authority's member code of conduct.

5.2 The matter was referred to a hearing of a Standards Committee Panel on 28th August 2024 and the outcome was reported on the Council's website in accordance with the Committee's procedure.

5.3 The PSOW's annual letter to the Council for the year 2023/24 is attached to this report as Appendix 1.

6. ACTIONS TAKEN BY THE COMMITTEE FOLLOWING CONSIDERATION OF PSOW REPORTS AND RECOMMENDATIONS

6.1 Not applicable.

7. NOTICES GIVEN TO THE COMMITTEE BY THE ADJUDICATION PANEL FOR WALES

7.1 No notices regarding member conduct were received from APW during the year.

7.2 No member of the County Council and no member of any community council in the area of Monmouthshire were respondents at APW tribunals.

8. TRAINING FOR MEMBERS

8.1 All members of the Council are required to undergo Code of Conduct training. Code of Conduct training was provided for all members at County Hall on 12th May 2022 in person. Further training has been made available for those members who were unable to attend this training, or who have been co-opted to the Council since this date.

8.2 All members and co-opted members have received training on the Code of Conduct, either in person or via the online format.

9. COMPLIANCE OF POLITICAL GROUP LEADERS WITH NEW CONDUCT DUTIES s 52A(1) LGA 2000

9.1 The Monitoring Officer is satisfied that all three MCC political group leaders complied with the duties set out above in s 52A(1) of LGA 2000 during the year ending 31st March 2024.

10. RECOMMENDATIONS TO THE AUTHORITY

10.1 Section 56B(5) of LGA 2000 states that:

An annual report by a standards committee of a relevant authority may include recommendations to the authority about any matter in respect of which the committee has functions.

10.2 The committee has no recommendations for the authority.

11. CONCLUSION

11.1 The standards committee strongly commends all members of the authority for continuing to maintain high standards of conduct throughout 2023/24.

12. RESOURCE IMPLICATIONS

None.

13. BACKGROUND PAPERS

Appendix 1 - PSOW's annual letter to the Council for the year 2023/24

14. CONSULTEES

Standards Committee
Monitoring Officer – James Williams

15. AUTHOR AND CONTACT DETAILS

Peter Easy, Chair, on behalf of the Standards Committee

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Ask for: Communications
01656 641150
Caseinfo@ombudsman.wales

Date: 6 September 2024

Councillor Mary Ann Brocklesby
Monmouthshire County Council

By email only
maryannbrocklesby@monmouthshire.gov.uk
paulmatthews@monmouthshire.gov.uk
JamesWilliams@monmouthshire.gov.uk

Annual Letter 2023/24

Dear Councillor Brocklesby

Role of PSOW

As you know, the role of the Public Services Ombudsman for Wales is to consider complaints about public services, to investigate alleged breaches of the councillor Code of Conduct, to set standards for complaints handling by public bodies and to drive improvement in complaints handling and learning from complaints. I also undertake investigations into public services on my own initiative.

Purpose of letter

This letter is intended to provide an update on the work of my office, to share key issues for local government in Wales and to highlight any particular issues for your organisation, together with actions I would like your organisation to take.

Overview of 2023/24

This letter, as always, coincides with my Annual Report – "A New Chapter Unfolds" – and comes at a time when public services continue to be in the spotlight, and under considerable pressures. My office has seen another increase in the number of people asking for our help – a 17% increase in overall contacts compared to the previous year, with nearly 10,000 enquiries and complaints received. Our caseload has increased substantially - by 37% - since 2019.

ombwdsmon.cymru
holwch@ombwdsmon.cymru
0300 790 0203
1 Ffordd yr Hen Gae, CF 35 5LJ
Rydym yn hapus i dderbyn ac ymateb i ohebiaeth yn y Gymraeg.

ombudsman.wales
ask@ombudsman.wales
0300 790 0203
1 Ffordd yr Hen Gae, CF 35 5LJ
We are happy to accept and respond to correspondence in Welsh.

During 2023/24 we considered and closed more enquiries and complaints than we ever have done before, and we reduced the average cost for each case and investigation. We started the year with a focus on reducing our aging cases, those over 12 months old, by 50% by the end of the year. These cases are often the most complex and distressing for the people making the complaint. I am extremely pleased to say we exceeded this target, reducing our aged investigations by over 70%. We are now well on track to meeting our objective to complete investigation of complaints within 12 months.

Public Services Complaints and compliance with recommendations

In total 1,108 complaints about local authorities were made to us last year – broadly the same number as the previous year. During this period, we intervened in (upheld, settled or resolved at an early stage) 14% of local authority complaints – a similar proportion to recent years.

We received 29 complaints about Monmouthshire County Council in 2023/24 and closed 32 - some complaints were carried over from the previous year. Monmouthshire County Council's intervention rate was 9%. Further information on complaints about your organisation can be found in the appendices.

We made 4 recommendations to your council during the year. To ensure that our investigations and reports drive improvement, we follow up compliance with the recommendations agreed with your organisation. In 2023/24, 4 recommendations were due and 25% were complied with in the timescale agreed. The remainder were complied with, but outside the timescales agreed or remain outstanding as at 9 April 2024.

Recommendations and timescales for complying with recommendations are always agreed with the public body concerned before being finalised, and we therefore expect organisations to comply within the timescales agreed.

Our Code of Conduct work

My role is to investigate allegations that councillors have breached their Code of Conduct. Where an investigation finds evidence to support the complaint on a matter which is serious enough to require a referral in the public interest, these cases are referred either to the local Standards Committee or to the Adjudication Panel for Wales for consideration.

In 2023/24, we received 16% more Code of Conduct complaints than the previous year, relating to both Principal Councils and Town and Community Councils. My office made 21 referrals – to Standards Committees or the Adjudication Panel for Wales, an increase from 12 the previous year.

I am grateful to your Monitoring Officer for their positive engagement with my office over the last year. We will continue to engage with them on matters relating to the ethical standards framework, including Local Resolution Procedures this year.

Independent Review

As you will be aware, I became aware of inappropriate comments, of a political nature, made by a member of my staff via social media. These comments were widely reported in the media. The member of staff in question was suspended and subsequently resigned. However, the comments prompted questions about my office's work on councillor Code of Conduct cases.

In view of the seriousness of the matter, I commissioned Dr Melissa McCullough to conduct an independent review of our Code of Conduct work, and I have published the full Terms of Reference for that review. I and my staff are engaging closely with the Monitoring Officer Group and the National Forum for Standards Committee Chairs in relation to this matter. I will be publishing Dr McCullough's final report on completion of the review and sharing it with the Senedd's Finance Committee this Autumn.

Supporting improvement of public services

We continued our work on supporting improvement in public services last year and worked on our second wider Own Initiative investigation. The investigation includes four local authorities and considers carers' needs assessments. I am grateful to the investigated authorities for their co-operation and candour throughout the year, and we look forward to sharing our finalised report this Autumn. This will make recommendations to the investigated authorities and will ask all local authorities across Wales to make similar improvements.

We have continued our work on complaints handling standards for public bodies in Wales and now have 56 public bodies following our model complaints handling policy. These public bodies account for around 85% of the complaints we receive. We have continued our work to publish complaints statistics, gathered from public bodies, with data published twice a year.

We continued our work to publish complaints statistics into a third year, with data now published twice a year. This data allows us to see information with greater context – for example, last year 15% of complaints made to Monmouthshire County Council's went on to be referred to PSOW.

Action we would like your organisation to take

Further to this letter can I ask that your Council takes the following actions:

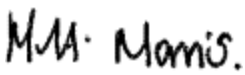
- Present my Annual Letter to the Cabinet and to the Governance and Audit Committee at the next available opportunity and notify me of when these meetings will take place.

- Consider the data in this letter, alongside your own data, to understand more about your performance on complaints, including any patterns or trends and your organisation's compliance with recommendations made by my office.

- Inform me of the outcome of the Council's considerations and proposed actions on the above matters at the earliest opportunity.

I would like to thank you, and your officers, for your continued openness and engagement with my office. Our information shows that local authorities are looking into more complaints than ever before and are using information from complaints to deliver better outcomes for the people of Wales.

Yours sincerely,



Michelle Morris
Public Services Ombudsman

Cc. Paul Matthews, Chief Executive, Monmouthshire County Council
James Williams, Monitoring Officer, Monmouthshire County Council

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Factsheet

Appendix A - Complaints Received

Local Authority	Complaints Received	Received per 1,000 residents
Blaenau Gwent County Borough Council	15	0.22
Bridgend County Borough Council	59	0.41
Caerphilly County Borough Council	56	0.32
Cardiff Council*	149	0.41
Carmarthenshire County Council	69	0.37
Ceredigion County Council	32	0.45
Conwy County Borough Council	36	0.31
Denbighshire County Council**	31	0.32
Flintshire County Council	51	0.33
Cyngor Gwynedd	38	0.32
Isle of Anglesey County Council	38	0.55
Merthyr Tydfil County Borough Council	12	0.20
Monmouthshire County Council	29	0.31
Neath Port Talbot Council	35	0.25
Newport City Council	52	0.33
Pembrokeshire County Council	40	0.32
Powys County Council	54	0.41
Rhondda Cynon Taf County Borough Council	64	0.27
Swansea Council	81	0.34
Torfaen County Borough Council	14	0.15
Vale of Glamorgan Council	77	0.58
Wrexham County Borough Council	76	0.56
Total	**1108**	**0.36**

* inc 2 Rent Smart Wales

** inc 1 Wales Penalty Processing Partnership

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Appendix B - Received by Subject

Monmouthshire County Council	Complaints Received	% share
Adult Social Services	0	0%
Benefits Administration	1	3%
Children's Social Services	7	24%
Community Facilities, Recreation and Leisure	0	0%
Complaints Handling	5	17%
Covid-19	0	0%
Education	0	0%
Environment and Environmental Health	0	0%
Finance and Taxation	1	3%
Housing	3	10%
Licensing	0	0%
Planning and Building Control	4	14%
Roads and Transport	4	14%
Various Other	4	14%
Total	**29**	

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Appendix C - Complaint Outcomes
(* denotes intervention)

Monmouthshire County Council		% Share
Out of Jurisdiction	6	19%
Premature	10	31%
Other cases closed after initial consideration	13	41%
Early Resolution/ voluntary settlement*	3	9%
Discontinued	0	0%
Other Reports - Not Upheld	0	0%
Other Reports Upheld*	0	0%
Public Interest Reports*	0	0%
Special Interest Reports*	0	0%
Total	**32**	

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Appendix D - Cases with PSOW Intervention

	No. of interventions	No. of closures	% of interventions
Blaenau Gwent County Borough Council	1	16	6%
Bridgend County Borough Council	8	59	14%
Caerphilly County Borough Council	3	48	6%
Cardiff Council	28	144	19%
Cardiff Council - Rent Smart Wales	0	3	0%
Carmarthenshire County Council	8	60	13%
Ceredigion County Council	7	32	22%
Conwy County Borough Council	0	37	0%
Denbighshire County Council	2	32	6%
Denbighshire County Council - Wales Penalty Processing Partnership	0	1	0%
Flintshire County Council	8	57	14%
Cyngor Gwynedd	6	39	15%
Isle of Anglesey County Council	10	41	24%
Merthyr Tydfil County Borough Council	3	14	21%
Monmouthshire County Council	3	32	9%
Neath Port Talbot Council	5	34	15%
Newport City Council	5	51	10%
Pembrokeshire County Council	7	38	18%
Powys County Council	7	53	13%
Rhondda Cynon Taf County Borough Council	11	63	17%
Swansea Council	12	77	16%
Torfaen County Borough Council	2	14	14%
Vale of Glamorgan Council	15	71	21%
Wrexham County Borough Council	7	79	9%
Total	**158**	**1095**	**14%**

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Appendix E – Compliance performance comparison

Local Authority	Number of recommendations made in 2023-24	Number of recommendations falling due in 2023-24	% of recommendations, complied with on time
Blaenau Gwent County Borough Council	1	1	100%
Bridgend County Borough Council	18	20	35%
Caerphilly County Borough Council	9	9	11%
Cardiff Council	74	75	92%
Carmarthenshire County Council	25	25	52%
Ceredigion County Council	23	23	78%
Swansea Council	29	32	63%
Conwy County Borough Council	0	1	0%
Denbighshire County Council	5	6	67%
Flintshire County Council	17	17	59%
Cyngor Gwynedd	12	19	74%
Isle of Anglesey County Council	26	24	92%
Merthyr Tydfil County Borough Council	11	9	56%
Monmouthshire County Council	4	4	25%
Neath Port Talbot Council	14	14	29%
Newport City Council	10	7	43%
Pembrokeshire County Council	24	23	96%
Powys County Council	18	16	31%
Rhondda Cynon Taf County Borough Council	26	26	77%
Torfaen County Borough Council	3	3	67%
Vale of Glamorgan Council	50	48	92%
Wrexham County Borough Council	16	19	42%

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Appendix F - Code of Conduct Complaints

	Monmouthshire County Council
Decision not to investigate	15
Discontinued	0
No evidence of breach	0
No action necessary	1
Refer to Adjudication Panel	0
Refer to Standards Committee	0
Total	**16**

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Appendix G - Town/Community Council Code of Complaints

		Investigations					
Town/Community Council	**Decision not to investigate**	**Discontinued**	**No evidence of breach**	**No action necessary**	**Refer to Adjudication Panel**	**Refer to Standards Committee**	**Total**
Caerwent Community Council	0	0	0	0	0	0	0
Llantilio Pertholey Community Council	0	0	0	0	0	1	1
Monmouth Town Council	0	0	0	0	0	0	0
Raglan Community Council	1	0	0	0	0	0	1

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Information Sheet

Appendix A shows the number of complaints received by PSOW for all Local Authorities in 2023/24. These complaints are contextualised by the population of each authority.

Appendix B shows the categorisation of each complaint received, and what proportion of received complaints represents for the Local Authority.

Appendix C shows outcomes of the complaints which PSOW closed for the Local Authority in 2023/24. This table shows both the volume, and the proportion that each outcome represents for the Local Authority.

Appendix D shows Intervention Rates for all Local Authorities in 2023/24. An intervention is categorised by either an upheld complaint (either public interest or non-public interest), an early resolution, or a voluntary settlement.

Appendix E shows the compliance performance of each Local Authority.

Appendix F shows the outcomes of Code of Conduct complaints closed by PSOW related to Local Authority in 2023/24.This table shows both the number, and the proportion that each outcome represents for the Local Authority.

Appendix G shows the outcomes of Code of Conduct complaints closed by PSOW related to Town and Community Councils in the Local Authority's area in 2023/24. This table shows both the number, and the proportion that each outcome represents for each Town or Community Council.

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SUBJECT:	**Safeguarding Annual Evaluation Report**
MEETING:	**Council**
DATE:	**24th October 2024**
Division /Ward Affected :	**All**

1. PURPOSE:

The purpose of this report is:

- To evaluate the progress of Monmouthshire County Council's key safeguarding priorities during 2023 / 2024 highlighting progress, identifying risks and setting out actions and priorities for 2024 - 2025.
- To inform Members about the effectiveness of safeguarding in Monmouthshire and the work that is in progress to support the Council's aims in protecting children and adults at risk from harm and abuse.
- To inform Members about the progress made towards meeting the standards in the Council's Corporate Safeguarding Policy approved by Council in July 2017, amended July 2022 and November 2023.

2. RECOMMENDATIONS:

- For Council to receive and endorse the Annual Safeguarding Report 2023/24.
- That Council tasks the Chief Officer of Social Care, Safeguarding and Health to maintain focus on the priority actions as set out in the Whole Authority Action Plan (appendix 4).

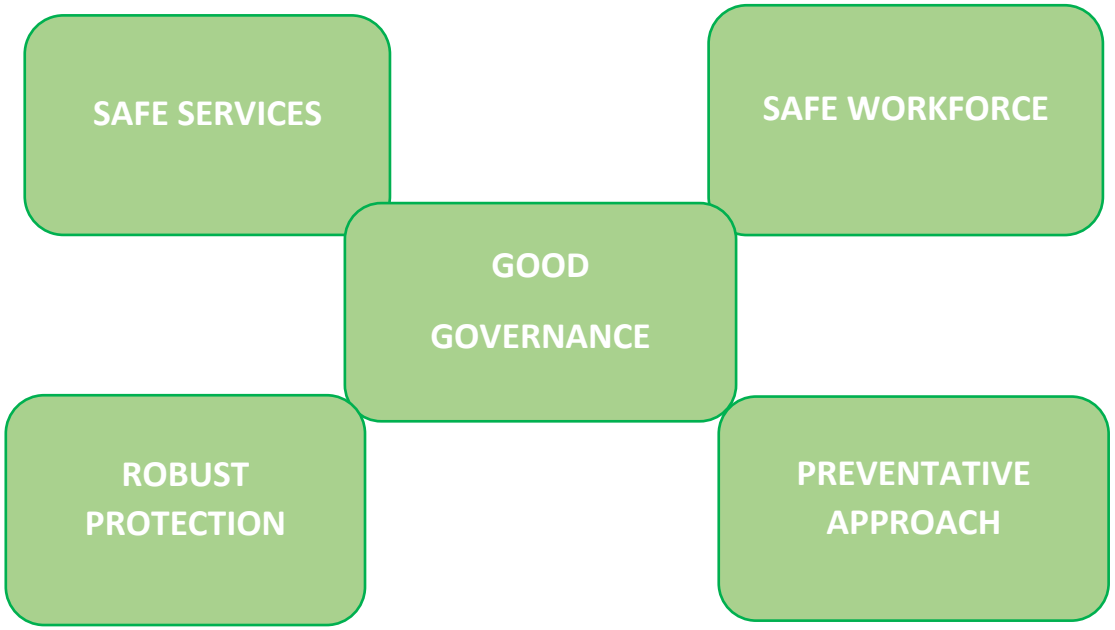
3. KEY ISSUES:

3.1 Monmouthshire County Council's Corporate Safeguarding Policy, which covers duties for both children and adults at risk in line with the Social Services and Well Being [Wales] Act [2014] and Wales Safeguarding Procedures, has helped to inform this evaluation report. The analysis reflects progress against priority areas set out within the policy and draws on data and information regarding both children and adults at risk.

3.2 2023-24 was a period of time when there were key pressures on service provision with increased demand for assessment and services for both children and adults at risk. The financial context required savings to be implemented across the Council creating additional pressure on services and resources. Budget pressures across the public sector resulted in partner agencies seeking to make service changes and reductions in order to make savings. During this period the Welsh Government continued to progress their agenda to remove profit from the care of children by 2027. The disruption in both the residential and private fostering markets have exacerbated placement insufficiency resulting in challenges to meet the needs of children looked after. Long-term sickness during the year within the Safeguarding Unit, resulted in some reduction in capacity and ultimately the need to recruit to the posts of Quality Assurance Officer and Safeguarding Service Manager. Despite these challenges, the overall self-assessed scores across the 5 domains of safeguarding either remained the same or improved by 1.

3.3 This evaluation report forms an integral part of the continual development of safeguarding practice across the Council and drives the work of the Whole Authority Safeguarding Group (WASG). The report seeks to balance qualitative and quantitative data and draw in other sources of information to support the evaluation.

THE CORNERSTORNES OF SAFEGUARDING IN MONMOUTHSHIRE:



3.4 The self-assessment score has been agreed by the Whole Authority Safeguarding Group [WASG] through critical challenge on the basis of evidence reviewed to date. It uses the corporate scoring framework to provide an overall judgement of effectiveness between 1 [major weaknesses] and 6 [excellent / outstanding]. The WASG seeks to triangulate the self-assessment process by drawing on a number or sources of information:

(1) A shared understanding of "what good looks like" based on experience, professional judgement, and representation on national and regional safeguarding boards;
(2) Data provided to and produced by Care Inspectorate Wales on both a national and regional basis;
(3) Care Inspectorate Wales Inspection of Children Services Feb 24;
(4) Review of performance data monthly to track trends and highlight performance issues against local, regional and national targets;
(5) Data and information from the regional safeguarding board and its subgroups;
(6) Quarterly Safeguarding reports produced by Independent Reviewing Officers.

3.5 The current self-assessment is set out below:

SELF ASSESSMENT SCORES:

CORNERSTONE	April – Sept 2017	Oct 2017 – March 2018	April 2018 – March 2019	April 2019 – March 2020	April 2020 – March 2021	April 2021 – March 2022	April 2022 – March -2023	April 2023 – March 2024
GOOD GOVERNANCE	4	5	5	5	5	5	5	5
SAFE WORKFORCE	3	4	3	3	4	4	4	4
PREVENTATIVE APPROACH	3	4	4	4	5	4	4	5
ROBUST PROTECTION	4	4	4	3	3	4	4	5
SAFE SERVICES	2	3	3	3	4	4	4	4
TOTAL	16	20	19	18	21	21	21	23

3.6 THE CORPORATE EVALUATION FRAMEWORK:

The evaluation score from 1-6	The evaluative context
Level 6 **Excellent**	**Excellent or outstanding**
Level 5 **Very Good**	**Good Major strengths**
Level 4 **Good**	**Important strengths with some areas for improvement**
Level 3 **Adequate**	**Strengths just outweigh weaknesses**
Level 2 **Weak**	**Important weaknesses**
Level 1 **Unsatisfactory**	**Major weakness**

3.7 Priority improvement actions arising from the evaluation form the basis of the action plan which is implemented and monitored through WASG.

4. OPTIONS APPRAISAL:

Not applicable to this report

5. EVALUATION CRITERIA

- Each 'cornerstone' section of the report opens with descriptors of 'what good looks like'. These descriptors provide the basis of how we measure the standard over time using both qualitative and quantitative sources.
- Safeguarding progress is reported on an annual basis to full Council.
- Safeguarding vulnerable people is central to the Council and requires strong leadership and governance. An evaluation of Safeguarding within Monmouthshire County Council is, therefore, reported to the Council on an annual basis.

6. RESOURCE IMPLICATIONS:

There are no resource implications to this report.

7. WELLBEING OF FUTURE GENERATIONS IMPLICATIONS [INCORPORATING EQUALITIES, SUSTAINABILITY, SAFEGUARDING AND CORPORATE PARENTING]:

This report is critically concerned with the effectiveness of safeguarding and corporate parenting (for children looked after) in Monmouthshire County Council.

8. CONSULTEES:

Performance and Overview Scrutiny Committee received the report on October 8th 2024. The Committee scrutinised the report. The discussion included the following points raised by the Members:

- The source of the definition of "what good looks like" was queried and how it is determined.
- Members asked how dependent we are on training for driving improvement, and when the training will be in place.

- How the Council supports the development of parental understanding and skills around different impacts was questioned.
- Members asked if there has been any improvement in addressing issues of misogyny or extreme misogyny in schools.
- Further detail was sought about the delivery of the action plan, given that many actions are marked as ongoing or amber.
- Members questioned the level of support in place for adult safeguarding concerns, particularly for domiciliary care workers who may face complaints or accusations.
- The Chair raised concerns around self-assessment as a sole method of measuring the performance of services, querying when the last external inspection was held, when the next one would be held and asked how our internal assessments compare with external ones. He suggested the approach of inviting in other authorities, to share learning and provide an independent assessment.

Other Consultees:

- Members of the Whole Authority Safeguarding Group [WASG]
- Chief Officer for Social Care, Safeguarding and Health

9. BACKGROUND PAPERS:

Corporate Safeguarding Policy

10. AUTHOR:

Head of Children's Services – Diane Corrister
Safeguarding and Early Help Service Manager – Jess Scarisbrick

11. CONTACT DETAILS:

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THE EVALUATION:

1. GOOD GOVERNANCE

SELF-ASSESSED SCORE = 5
WHAT DOES GOOD LOOK LIKE? In Monmouthshire County Council we ensure that safeguarding for children and adults at risk is understood as "everyone's responsibility". With strong leadership there is a continuous focus on embedding safeguarding culturally across all parts of the Council at a "hearts and

minds" level. Safeguarding is supported by robust policies and operating procedures which are embedded within all settings and services. We work effectively with the Gwent Safeguarding Board to ensure good alignment and maximise our resources.

ANALYSIS

Despite resource pressures across directorates and capacity issues within the Safeguarding Unit, safeguarding has remained a priority for the Council with key strengths within directorates and across council relationships. The SAFE (Safeguarding Assessment Framework for Evaluation) process has continued to roll out across directorates and reviews have taken place in a timely manner. The Safeguarding Unit continues to be available to offer support and advice as well as being the conduit for new and developing safeguarding policy and guidance from the Regional Safeguarding Board. Issues raised within the previous SAFE assessment led to the strengthening of support in the safe recruitment process, specifically in risk management following DBS certifications.

Monmouthshire representation and engagement in the work of Gwent Safeguarding Board remains strong and the priorities set in in the regional board's annual plan are reflected in the priority work of the Council's Safeguarding Unit. The Whole Authority Safeguarding Group continues to receive, review, and implement developments in safeguarding flowing from regional and national policy.

Within this period there was a change of Cabinet Member for Social Care, Safeguarding and Accessible Health Services from Cllr Tudor Thomas to Cllr Ian Chandler. There are reporting mechanisms in place into Scrutiny and Council strengthened by positive relationships between officers and Council Leaders.

The CIW inspection report of Children's Services found that *'safeguarding is understood at many levels of the organisation'*.

For these reasons our self-assessment score remains at 5.

KEY STRENGTHS:	NEXT STEPS:
- Safeguarding Audit Framework for Evaluation [SAFE] is in place and a regional form has now been implemented.	- Complete the SAFE process 2023 - 2025 - Directorates to develop increased autonomy in completing their individual SAFEs, with advice and guidance to be sought from the Safeguarding Unit where necessary.

- Continuous positive relationships between Safeguarding Unit and Directorates with ongoing provision of advice and guidance for individual safeguarding issues. - Committed participation by Monmouthshire Safeguarding Unit in the Regional Safeguarding Board groups and subgroups, this influences and shapes regional plans and supports the quality assurance of local practice. - Monmouthshire's Corporate Safeguarding Policy has been updated (ratified November 2023) following the introduction of the National Safeguarding Training Standards. - The Core Data Set for safeguarding has been agreed by WASG and is now being collated on a regular basis to support increased oversight. - Mechanisms are in place to ensure the Council and Cabinet are informed about the progress of safeguarding issues via: • Chief Officer of Heath, Social Care and Safeguarding's Report to Council (previous 7/12/23) • Corporate Parenting Panel • Monthly meetings between Children and Adult Heads of Service, Chief Officer and Leader of the Council and the Cabinet Member.	- Recruitment of a Safeguarding Service Manager. - Ensure correct link between Thinqi and the implementation of the National Training Standards to include Safeguarding training for Elected Members and School Governors. - Continue to develop the core data set as a standard agenda item for WASG to ensure whole council scrutiny.
PROGRESS AND EVIDENCE:	

SAFEGUARDING AUDIT FRAMEWORK EVALUATION [SAFE]: The Safeguarding Unit oversee the SAFE process to ensure that all directorates undertake their self- assessment in line with the Local Authority's Corporate Safeguarding Policy and the Social Services and Safeguarding Act (2014). SAFEs are completed within every directorate by those services / teams that work with adults at risk, children, young people and families. A 'tracker' is in place to allow escalation to directorate leads or WASG should the self-assessment be delayed, or if there are significant concerns. During last the last SAFE process, no matters required escalation.

Directorate Safeguarding Leads have developed an understanding of safeguarding and how it applies in their own service areas, seeking advice and guidance from the Safeguarding Unit when required. Whilst the SAFE is a self-assessment, the outcomes are reviewed by the Safeguarding Unit. The SAFE process originally developed in Monmouthshire has now been adopted across the other Gwent Authorities resulting in a regional tool. This assists in being able to compare and contrast good practice in safeguarding at a regional level.

SAFEGUARDING CORPORATE POLICY: The Safeguarding Corporate Policy was reviewed in July 2022 and in November 2023 and is due for review in July 2024, when it will be updated to include the introduction of the revised National Exploitation Plan.

GWENT SAFEGUARDING BOARD [GSB]: There is prominent representation of Monmouthshire on the Gwent Safeguarding board with Jane Rodgers, Chief Officer Social Care & Health being co-chair of the Board and Diane Corrister, Head of Childrens Services, and Jenny Jenkins, Head of Adults Services representing Monmouthshire at Head of Service Level. The Gwent Safeguarding Board [GSB] delivers its strategic priorities through a number of subgroups that manage the core business and other more specific pieces of work, such as devising multiagency guidance and protocols, undertaking case reviews, and devising safeguarding training modules. Members of the Safeguarding Unit either chair or are members of the subgroups and working groups of the Safeguarding Board. Membership of these groups also provides good links into the Violence Against Women, Domestic Abuse and Sexual Violence [VAWDASV] Board.

WHOLE AUTHORITY SAFEGUARDING GROUP [WASG]

The Whole Authority Safeguarding Group [WASG] has continued to meet bi-monthly on a digital platform. The group ensures that corporate Safeguarding has oversight at a senior level, with membership from each directorate lead. These meetings identify safeguarding concerns and themes; share knowledge around safeguarding issues and, where required, promote a strategic and coordinated approach. A Core Data set has been agreed by WASG. Moving forward, this should provide increased opportunity to inform WASG members of safeguarding performance at a whole authority level.

2. SAFE WORKFORCE

SELF-ASSESSED SCORE = 4

WHAT DOES GOOD LOOK LIKE?

We ensure that safe recruitment and human resource (HR) practices operate effectively and are embedded across the Council for the whole workforce [paid and unpaid]. We ensure that individuals working with children and adults at risk are suitable for the role they are employed to do and are focused on outcomes for people. The whole workforce is clear about their duty to report concerns and to keep children and adults at risk safe.

ANALYSIS

There has been significant development of the Thinqi system across the council to support the management of training across the workforce. The system is now being implemented across all areas. The National Training Standards for safeguarding have been adopted in Monmouthshire. Whilst there are delays in the development of a regional safeguarding training offer (in line with the new standards), safeguarding training continues to be effectively delivered within Monmouthshire through collaboration between Safeguarding Leads and the Training and Workforce Development team. The right level of safeguarding training has been identified for the workforce based on role, task and regulatory requirements. Safeguarding Training continues to be offered to all new starters as part of their induction either digitally or in person via the Safeguarding Unit. This supports and informs a workforce "who are the eyes and ears" of the council in recognising the signs and symptoms of safeguarding concerns - knowing how and when to respond helps keeps our communities safe.

Monmouthshire has continued strong arrangements to ensure safe recruitment. There are good processes and systems in place, which are reviewed and monitored to ensure that safe recruitment practice is followed. Monmouthshire's Safe Recruitment Policy is aligned to the Gwent

KEY STRENGTHS:	NEXT STEPS:
- Continuous priority given to safe recruitment practice which is well embedded. - Gwent Safeguarding Board has ratified the Safer Recruitment Policy and Safer Employment guidance (March 2024).	- Thinqi system to be fully implemented across all areas of the council to support full and accurate safeguarding training data. - National Training Standards to be embedded within Thinqi

- The Thinqi training management system is being implemented across the council which will provide accurate information on completion rates of mandated safeguarding training. - Monmouthshire has adopted the National Safeguarding Framework. - Multi Agency Local Practitioner Forums run biannually by the Gwent Safeguarding Board raise issue of wellbeing and safeguarding to staff from a range of agencies and are well attended in Monmouthshire. - The Practitioner Concerns process is well embedded with a strong multiagency presence, and effective communication with the Safeguarding Unit regarding advice over thresholds and required actions.	- To review and implement any actions arising from the national task and finish group developing further guidance around Practitioner Concerns.

PROGRESS AND EVIDENCE:

- The Gwent Safeguarding Board has ratified their Multiagency Safe Recruitment protocol (March 2004) which sits alongside Monmouthshire's own internal guidance and is well aligned.
- People Services have reported a faster turnover of DBS checks, which means that new staff are able to on-board in a timely way.
- Systems and processes which provide notifications for people and their managers who require DBS checks are automated via Power Bi processes.
- Safe Recruitment processes are part of the considerations within the SAFE assessment within all directorates.

PRACTITIONER CONCERNS / ALLEGATIONS:

Monmouthshire's Safeguarding Unit has overall responsibility for the management of the Practitioner Concerns / People in a Position of Trust process as set out in the Wales Safeguarding Procedures. A practitioner concern is when an allegation of potential or actual harm or abuse is made against a person working in a position of trust, either in their personal or professional life.

- Practitioner Concerns are managed via a tracker which identifies the status of each case, including what investigation is required, and the outcome of each process. This is reviewed monthly by the Safeguarding Unit with the view to preventing delays, recognising the impact this has on individuals and on wider employment issues within the council. The primary cause of delays are due to the length of time police take to conclude criminal investigations and delays in CPS advice. Police and CPS delays are caused by pressure within that system and reprioritisation based on levels of risk. A further issue is the increase in on-line / digital abuse which is time and resource heavy to investigate.

- The safeguarding unit supports all decision making within the practitioner concerns process - intervening where possible to expediate the conclusion and ensuring that staff wellbeing is a main consideration throughout and that appropriate support is offered.

- The Safeguarding Unit members work closely across all 5 Gwent Local Authorities to ensure consistent thresholds around practitioner concerns, which helps to benchmark local practice.

PCM DELAYS:

Here is the breakdown of PCM cases and the time taken to conclude during this period:

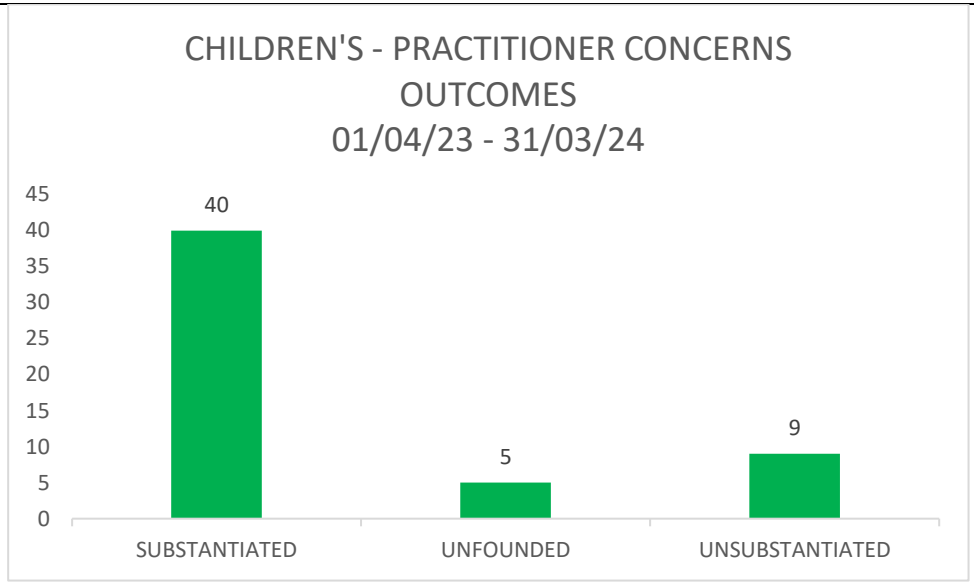
Length of time to conclude	No. cases
<1 month	15
1 month	19
2 months	6
3 months	4

4 months	**3**	
5 months	**4**	
6 months	**1**	
7 months	**1**	
12 months	**1**	

Out of the 10 cases that took 4+ months:
8 related to Police investigations (awaiting advice from CPS)
2 related to internal investigations (delays caused through the circumstances of the individuals concerned)

During this time, risk assessments for the person involved, are continually reviewed [i.e. the persons position in work and whether suspension or re-deployment is required].

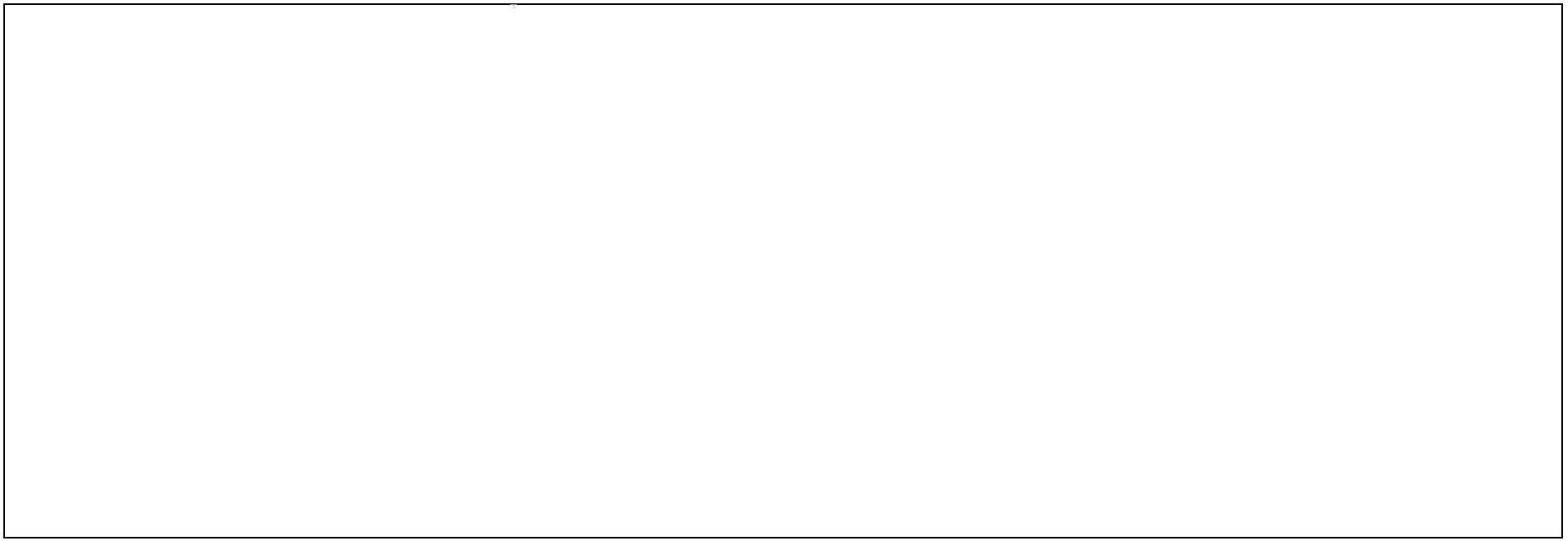
Children Services:
During 01/04/23 – 31/03/24 the Unit held Practitioner Concerns Strategy Meetings about **75** practitioners, relating to **87** children. During the same period **54** Practitioner Concerns Strategy Meetings were concluded, resulting in 74% cases concluding with a Substantiated outcome.
In terms of the professionals subject to allegations, education staff are the largest of group followed by sports instructors.



Adults:

During 01/04/23 – 31/03/24 the Safeguarding Unit held Practitioner Concerns Strategy Meetings about **89** practitioners, relating to **57** adults at risk following practitioner allegations. During the same period **68** Practitioner Concerns Strategy Meetings were concluded, resulting in 50% cases concluding with the Substantiated outcome.

Domiciliary care workers are the professional group subject to the highest numbers of allegations, followed closely by hospital support workers and registered nurses.



3. PREVENTATIVE APPROACH

SELF-ASSESSED SCORE = 5
WHAT DOES GOOD LOOK LIKE? We work collectively and with partners to identify emerging issues, risks and challenges within our communities. We demonstrate clear multiagency approaches to developing practice in how we respond to emerging safeguarding issues. We support access to universal and targeted support services to reduce risks through early intervention and preventative approaches. Within Children's Services, we develop services at all levels aimed at preventing children from experiencing harm - supporting the development of parental understanding and skills to prevent the need for children to be looked after and support their safe exit from care.

ANALYSIS
There remains a strong multi agency approach to early help and prevention, seeking to support vulnerable people stay safe and reduce the risks of abuse and harm. **The self-assessed score has therefore remained at 5** for the following reasons: There are a number of partnership forums (for example, the Homeless Intervention Panel, SPACE Wellbeing panel and the Monmouthshire Exploitation Group) which support information sharing and partnership working – helping to shape service development and active risk management in the face of issues affecting communities. Monmouthshire Exploitation Group (MEG) is chaired by the Safeguarding Service Manager, and attended by a wide range of council partners including Community Policing, Public Health, Safer Communities, Children and Adult Safeguarding, Education Safeguarding, Housing and Registered Social Landlords, Youth Offending Services and St Giles Trust (a charity using expertise and real-life past experiences to support people who are hard to engage). MEG has co-ordinated approaches to emerging issues such as the exploitation of young people to sell Vapes within schools. The group has also started to consider how to develop safeguarding practice around young people vulnerable to exploitation during their transition to adulthood, particularly when 'children's' support services cease at 18. Monmouthshire utilises regional framework and toolkits to support practitioners in recognising and managing issues of child and adult exploitation. The regional forums such as MACE (Multi-agency child exploitation meetings) have allowed for a wider focus on perpetrators and locations across county boundaries where addressing risks require a multiagency approach. MACE is also now the forum for considering the potential exploitation of Unaccompanied Asylum-Seeking Children. The Police have recognised Monmouthshire's good practice and management of the exploitation of young people and vulnerable adults and seek to hold the Authority's work as an exemplar across Gwent. Early help support services for children and families are well maintained and have managed to reduce waiting times, seeing a level of normal business resuming following the challenges raised during the pandemic. Whilst there is always more to do, Monmouthshire's community-based teams are committed to building safer and more resilient communities. Feedback from CIW during inspection of Children Services (Feb 24) noted that there were high levels of service user satisfaction and participation related to the services provided outside of the statutory arena, as well as strong partnership working at this level. The dependency on grants to support many elements of early help and preventative services remains a risk.

There has been a wider lens applied to “prevention” using available grants to develop services aimed at supported children exit safely from statutory services (child protection of child looked after) and to avoid repeat referrals.

KEY STRENGTHS:	NEXT STEPS:
- Preventative safeguarding and partnership working remains strong. - There has been a wider lens applied to “preventative services” supporting vulnerable people to exit from the statutory system and continue to live safely within their communities. - The INFACT service has been developed to support and shape Children and Families involvement in community-based support, build on established approaches. - MEG supports the Council to address issues around exploitation, and the Council has been recognised for its good practice in tackling exploitation.	- Strengthen the links between the Wellbeing Team, the Safeguarding Unit and MEG. - MEG to work with partners both regionally and locally to develop transitional safeguarding to support young adults vulnerable to exploitation. - Complete the Modern-Day slavery statement and update the Corporate Safeguarding Policy. - Support Gwent Police in recruiting for MARAC Chairs across the 5 LA’s (to support consistency of practice). - Include Neuro Diversity in the training profile for PREVENT. - Implement Thinqi to support compliance with VAWDASV training.

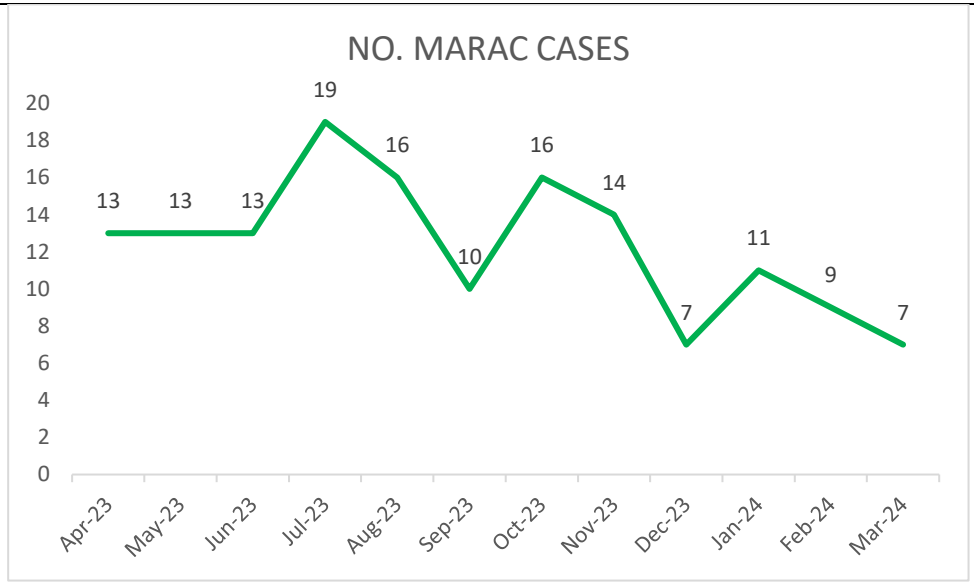
PROGRESS AND EVIDENCE:

VIOLENCE AGAINST WOMEN, DOMESTIC ABUSE AND SEXUAL ABUSE [VAWDASV] Monmouthshire remains committed to the prevention of Violence Against Woman, Domestic Abuse and Sexual Violence [VAWDASV]. VAWDASV training is mandatory for all employees of the council and elected members. The council has continued to ensure that employees have the relevant level of VAWDASV training and modules are embedded within Thinqi. Once Thinqi is implemented across the Council training needs including refresher training will be flagged automatically.

MULTI AGENCY RISK ASSESSMENT CO-ORDINATION [MARAC]: The Safeguarding Unit currently shares chairing the Multi-Agency Risk Assessment Committee (MARAC) with the police. MARACs consider high risk domestic abuse cases. MARAC is held on a fortnightly basis in Monmouthshire and the digital platform promotes multi-agency attendance to aid information sharing and shared safety planning. The number of cases discussed per month generally remains around 10-12. The number of people being referred into MARAC have decreased to 148 [from 159 last year]. However, the underlying trend is upward. Out of the 5 Gwent Local Authorities, Monmouthshire, whilst still the lowest, has seen the most significant increase over recent years. It is felt that the rise in numbers is linked to training generating a greater understanding of the risks related to domestic abuse and how to respond.

There have been no Domestic Abuse Homicide Reviews for Monmouthshire during this period.

The number of cases discussed at monthly meetings during the year is shown below:



MODERN DAY SLAVERY / NATIONAL REFERRAL MECHANISM:

Following the role out of the Modern-Day Slavery Protocol, there has been additional training delivered in Exploitation, Modern Day Slavery and trafficking including the National Referral Mechanism (NRM). This training is provided by Gwent Police as well as through the Gwent Safeguarding Board. Along with the other Gwent authorities, Monmouthshire continues to host children's NRM panels as part of national pilot. This means that decisions about NRM threshold will be made by local Safeguarding partners, including Children's Services, Police and Health. Adult's suspected of being exploited are managed and supported by Gwent Police with the NRM applications being reviewed by the Home Office.

From April 2023 to March 2024, 71 NRM child referrals had been submitted throughout Gwent, 8 of which were regarding children from Monmouthshire [11%]. All referrals were processed within the 90-day limit although there are still significant delays in the Home Office ratifying decisions.

Of the 8 Monmouthshire children referred to NRM, 5 met the criteria for exploitation and were awarded an advocate. The remining 3 children were retained within the Monmouthshire exploitation process under Operation Quartz. Of the 8 children, 5 were male and 3 were female.

The panels are well attended by Monmouthshire Local Authority and the First Responders (SW/Police/Education etc). The panels enable a high level of information sharing around the cases which assist panels in making informed decisions. The NRM regional coordinator attends regular Monmouthshire Children Exploitation Strategy Meeting meetings on a consultation basis which supports discussions to determine whether a referral to NRM should be submitted.

Criminal exploitation of children is the main category for referral into the NRM across England and Wales.

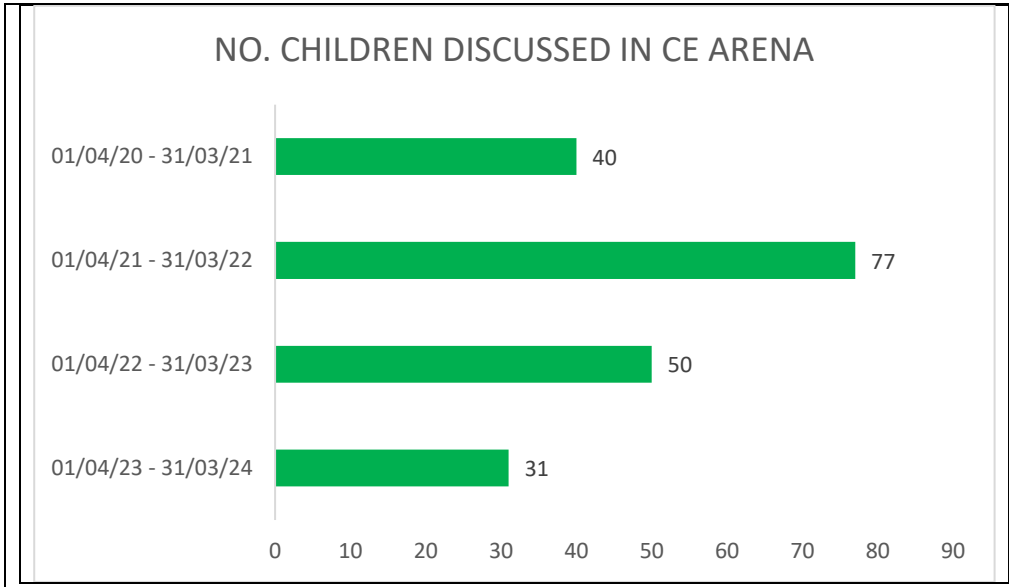
EXPLOITATION:

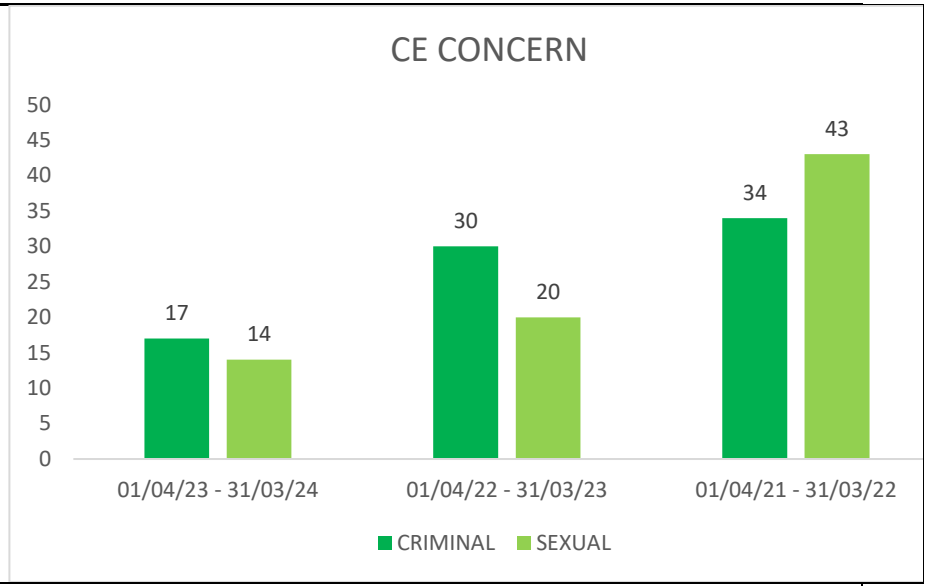
The exploitation of children is considered under 2 broad categories of Sexual Exploitation and Criminal Exploitation:

Child Sexual Exploitation and Criminal Exploitation

During 01/04/23 – 31/03/24, 31 children [a decrease from 50 children last year] were subject to Child Exploitation Meetings, where consideration is given for children to become part of a specialist Gwent Police Operation named Quartz. The decrease in numbers relates to professionals having a clearer understanding of the referral criteria. 17 children were considered at risk from Criminal Exploitation and 14 from Sexual Exploitation (although often children can be at risk of both).

During this period more males were discussed, which is a change to previous years. This is linked to the increasing focus and recognition of Criminal Exploitation (which is on the increase). Over half of all children considered were at risk of criminal exploitation rather than sexual exploitation.





The youngest child discussed was aged 12 with the largest age group being those children aged 16 years old. This can prove difficult when young people turn 18, when issues around 'capacity' and consent come into play. Gwent Police intend to undertake some work focussing on the vulnerable group of 16-23year olds. Monmouthshire Exploitation Group [MEG] now has a standing agenda item relating to the transition of vulnerable young people where there are concerns about exploitation. Members are considering how information can be appropriately shared and services improved with the aim of reducing risks to young adults.

Most of the cases being discussed, relate to criminal exploitation, and of those cases the majority are males involved in "drug running" (movement and transport of drugs). In some situations, it has been found that these exploited young men are themselves sexually exploiting young women/girls. Strategy meetings consider groups of young people who are linked to help formulate the most appropriate interventions at both a peer group and individual level. Chepstow/Caldicot are the areas within the County where there are most concerns over young people being at risk of exploitation, particularly around the secondary schools. These areas have been a focus of work being undertaken by Operation Quartz Officers.

Additional Information

- The majority of children being discussed in the exploitation arena, are those residing at home with parents, followed by those residing in residential settings/placements.
- Most children are supported under a Care and Support Plan, rather than a child protection plan.
- Input from the Engagement and Intervention Workers, as well as the Youth Homeless Co-ordinator supports positive outcomes for young people. 81% of children discussed remained in some form of education or training.
- The regional Multi-Agency Child Exploitation (MACE) meetings continue to provide oversight of child exploitation cases. These meetings enable the region to share intelligence on linked cases, locations of concern and case escalations, the numbers of children being considered, as well themes and emerging trends.
- Monmouthshire is recognised within Gwent, as managing and responding well to children at risk of exploitation through timely and effective responses. This has led to a reduction of risks with no children needing to be re-referred into the exploitation arena following case closure. Gwent Police are seeking to replicate these strategies with other Gwent Local Authorities.
- Public Health Wales have taken a lead on the issue of exploitation and its links to Vapes including those being sold on school premises. Trading Standards remain active in trying to disrupt the flow of vapes from shops to school premises; however, much of the acquisition remains on-line. There are plans for Public Health Wales to co-ordinate Local Authority safeguarding leads, Trading Standards, Community Partnerships, Drug and Alcohol Services and the Police to form a Tobacco and Vaping Alliance (TVA) in order to tackle the issue.
- The Monmouthshire Exploitation Group (MEG) reports directly to the Public Service Board's Safer Monmouthshire Group and Whole Authority Safeguarding Group, meeting on a quarterly basis.

Unaccompanied Asylum-Seeking Children

The number of Unaccompanied Asylum-Seeking Children (UASC) has remained stable over the year. The numbers of UASC the Local Authority is required to support is capped at 16, although there has been up to 19 young people arriving here either via the National Transfer scheme or young people arriving 'spontaneously' under their own steam.

Unaccompanied Asylum Seeking Children (UASC) have increased vulnerability to exploitation due to their life experiences and lack of appropriate community services.

Children's Services has increased the support provided to UASC aged 16+ whilst they await decisions regarding their asylum applications. These services include 2 semi-independent living properties with floating support in Newport and Cardiff and a dedicated support worker with experience in supporting asylum claims, and in ensuring that the education, religious, dietary and cultural needs of the young people are met.

SAFEGUARDING IN SCHOOLS:

- Each school/setting has its own Safeguarding Policy, using a shared template that is based on statutory guidance including Keeping Learners Safe.
- Monmouthshire continues to apply a proactive approach to responding to issues of sexual harassment in schools and has worked with colleagues from other agencies, coordinated by the VAWDASV team, to promote a Whole Education Approach.
- There have been a number of initiatives implemented aimed at developing the understanding of peer-on-peer sexual harassment and how to manage (and reduce) incidences. Where children raise concerns about sexual harassment or sexually harmful behaviours a report is made to Children's services (for the victim and alleged perpetrator) and reported to police. Schools then manage risks in school via risk assessments and support plans, aiming to ensure that all children can continue to access education provision.
- A challenging bullying group (CBG) was established in 2022 in MCC. A challenging Bullying Action Plan is the framework for the work of the group whose aim is to develop best practice in preventing and challenging bullying behaviours (including sexual harassment).
- The central funding for the School Police Liaison Officer role was withdrawn by WG this year. Partner agencies, together with Gwent Police, are considering how to manage the absence of this role moving forward, so that key elements of the role (such as delivering sessions to groups in schools) are not lost.
- The schools remain informed about issues affected young people such as Emotions and Behaviour, School connectedness, Sleep, Friendship and bullying, Sexting, Body image through participating in SHRN (School Health Research Network). The outcomes of the report are evaluated by a task and finish group to identify areas of concern and to inform how we support learners.
- Multi Agency Meetings [MAMs] are in place to consider what support can be offered to pupils identified as vulnerable. There is good multiagency attendance including Building Stronger Families Team [BSFT], Young Carers, School Based Counselling and other partners across the pre statutory system. The MAMs play an important part in preventative safeguarding.

PROVIDING EFFECTIVE EARLY HELP:

SPACE WELLBEING AND FAMILY SUPPORT PANEL (single point of access for children's emotional wellbeing):

Monmouthshire SPACE Well-being and Family Support Panel facilitates the co-ordination of early intervention services and preventive support for children, young people and their families. This helps to reduce the escalation of concerns to statutory thresholds. Partners include Families First projects Families Services Team, Creative Therapies and Acorn Project, Primary and Secondary CAMHS (Children and Adolescent Mental Health Services), Family Intervention Team (FIT), School and Community Counsellors, as well as council led projects

Total Number of Referrals in Quarter 1	Total Number of Referrals in Quarter 2	Total Number of Referrals in Quarter 3	Total Number of Referrals in Quarter 4	Total Number of Referrals in 2023/24
305	262	325	235	1127

- Quarterly Average referrals received are 282. The main theme of referrals being received is for support around Anxiety, Emotionally Based School Non-Attendance (EBSNA), Emotional Dysregulation, Sensory Needs, Traumatic Stress and non-compliant/defiant behaviours.
- The total number of referrals has dropped by approximately from 16% to 1127 from 1345 in 2022/2023. This is consistent with a further drop of approximately 16% from 1603 in 2021/2022. This continued drop in referrals could be attributed to families being able to return to a more stable routine coming out of the period impacted by the pandemic; as well as the introduction of a CAMHS In-Reach Service which provide consultation and support for schools regarding children's mental health and emotional wellbeing.
- There was no waiting list for referrals being processed for a Panel discussion.
- Children's services working in the preventative arena have very short waiting lists, and evaluation at the end of service provision indicates high levels of service user satisfaction for years 23/24.

INTEGRATING FAMILIES AND COMMUNITIES TEAM (InFaCT):

The Integrating Families and Community Together (InFaCT) service works to help people navigate existing resources and also to come together to support each other and create community responses to local challenges. In 2023/24 InFaCT responded to 72 requests for support; 92% of these requests were closed with a successful outcome i.e. InFaCT was able to source a solution to the problem or need. 54% of the requests were closed with a successful outcome within 4 weeks.

HOMELESSNESS PREVENTION:

2023-2024 marks the first full year since the adoption of Monmouthshire's 5-year Rapid Rehousing Transition Plan to tackle homelessness in the county. Progress is being made against the plan to make homelessness rare, brief, and unrepeated. The strategy cements previous work to increase the prevention of homelessness; minimise any time spent in temporary accommodation when homelessness cannot be prevented; and to provide timely support at the level and type required for households to maintain settled accommodation. The Prevention Officers offer support around affordability, property searches and landlord mediation, and achieved a prevention success rate of 71% for 2023-2024, an increase on 50% from the previous year.

- The Discretionary Homelessness Prevention Fund has remained available to the Housing Options Team for the 2023-2024 financial year.
- Monmouthshire Council continues to enjoy a positive relationship with the Registered Social Landlords operating in the county. Allocations to homeless households remain amongst the highest in Wales and there has been a recent review of some policies that have been identified as barriers to some households obtaining settled accommodation.
- The council agreed to supplement the availability of temporary accommodation through purchasing homes and repurposing existing Council owned assets subject to Cabinet approval.
- The Council has completed the purchase of one property and one former agricultural property is due to be repurposed as temporary accommodation. In addition, a former care home has been approved for adaptation and use as temporary accommodation as well as providing a hub for other community organisations. This provision should become operational, subject to planning approval, in 2024-2025 and will benefit from the additional resources of an in-house support worker and scheme manager.

PREVENT: (Counter Terrorism and Radicalisation)

The majority of referrals into Monmouthshire are from schools – reflecting the positive impact of radicalisation awareness training to ensure that schools are aware of when to make a referral.

10 referrals were received in 2003 [six of which were from schools] and a further 4 between January – April 2024. Referrals were received across the year groups from Year 7 to Year 13; there were no referrals received for younger pupils. Adult referrals can come from a range of sources.

Concerns often start with children accessing the internet, which was particularly the case coming out of the pandemic. When referrals are initially received the Police visit families and talk about internet access, particularly around the dark web. The threshold of concern around an individual's need is high for them to be adopted by the Channel Panel, and Police check, for example, whether an individual has been previously open to a 'Pursue' intervention.

There has been a recent emergence of Autism traits in the referrals received. An Autism provider has been engaging to work with those people who are identified at potential risk. This also provides a level of assessment / understanding around behaviours and autistic traits.

There is a specific issue with Llanarth Court, which is a medium secure independent Psychiatric Unit in Monmouthshire. English Health commissioners can place an individual at Llanarth at very short notice, some of whom have been identified as very high risk of radicalisation. The Forensic Psychiatrist from Llanarth attends all Chanel meetings to discuss the level of treatment being received, and there are good links maintained with the Counter Terrorism Police Unit.

There has been positive work undertaken with Housing to ensure people's needs are assessed thoroughly and that they are then supported appropriately.

Safeguarding is always at the forefront when cases are explored, as inevitably there are some extremely vulnerable people. For those who are managed via Channel Panel we review each closed case after 6 months. Of those cases reviewed after 6 months, there have been no re-referrals into Channel due to further concerns around radicalisation. This indicates the effectiveness of the interventions made in reducing harm in this area.

4. ROBUST PROTECTION

SELF-ASSESSED SCORE = 5
WHAT DOES GOOD LOOK LIKE? We operate best practice in protecting children and adults at risk and ensure that all concerns about possible abuse or neglect are recognised and responded to appropriately. Multi-agency plans and interventions reduce risks and needs for children and vulnerable adults including those at risk of significant harm.

ANALYSIS

This year has seen significant increase in demand at the 'front door' of children's safeguarding services. Despite this, performance in meeting statutory timescales for responding to referrals has been maintained. More now needs to be done to understand what is driving safeguarding referrals, demand and resource requirement.

In adult safeguarding, improvements made to ensure safeguarding enquiries are undertaken in a timely way has been sustained.

The physical presence of some partner agencies within the safeguarding hub has been reduced due to budgetary pressures. The Safeguarding Hub is using digital means to ensure that multi-agency decision making and sharing of information remains in place to support good practice.

Care Inspectorate Wales Service Inspection of Children's Services (Feb 24) reported that the leadership team are well informed of the pressures within the system, and that they had put in appropriate measures in order to respond effectively. The inspectorate commented positively on the practice framework, Keeping Children Safe and on the positive practice that was observed within child protection and with families who were within a legal (pre-court) framework.

A temporary post has been created in children's services to promote good safeguarding practice in ensuring statutory child protection timescales are met and to support the role out of the 'Keeping Children Safe' practice framework.

Children's Services continues to experience challenges in locating appropriate placements for children due to insufficiency of placements and instability within the provider market. There are plans in place to increase the Council's in-house provision.

For these reasons we have moved the evaluation score from 4 to 5

KEY STRENGTHS:	NEXT STEPS:
- The safeguarding hub uses digital platforms to ensure both Child and Adult safeguarding processes are managed effectively through multi-agency arrangements and within statutory timescales. - The revised Child Protection practice framework 'Keeping Children Safe' - Ongoing commitment to improving the quality of practice with key focus on development and training for practitioners. - Adult safeguarding has maintained improvements in compliance to timescales and there is an increased understanding of adult safeguarding within the service and across partner agencies. - Services are developed in response to priority risks (e.g. Family Resolution Team).	- Undertake an analysis of demand data at both front door of adults and children to identify trends, resource need and to inform partnership approaches. - Undertaken further planned engagement with Adult Services to promote safeguarding statutory compliance and understanding - Utilise a 12-month Implementation Officer post to support the roll out of Keeping Children Safe practice framework and to support compliance with statutory timescales; - Appoint to Safeguarding Service Manager position - Recruit a 4th Service Manager to take forward the development of Monmouthshire Children and young people placements. - Review of grant funded services to understand risks and resource need post 2025. - Implement the Safeguarding QA Framework

PROGRESS AND EVIDENCE:

SAFEGUARDING CHILDREN AND ADULTS AT RISK:

The CIW inspection report notes that *"overall, safeguarding is understood at many levels of the organisation. The local authority has a local policy for Keeping Children Safe within the child protection process. This supports internal staff to have a clear understanding of local guidance and standards. It includes arrangements for managers and leaders to have line of sight on the lived experience of children."*

Adult's and Children's safeguarding practitioners continue to have a physical presence within the hub with attendance on separate days by representatives of Women's Aid, Space Wellbeing, Police, and Safeguarding in Education. Health have reduced their physical presence and created a shared regional resource from a central point. CIW Inspection Feb '24 reported that there remains a commitment from all safeguarding agencies to work together via digital technology to ensure the safe sharing of information and compliance with the Wales Safeguarding Procedures.

There have been no adult or child practice reviews held in regard to Monmouthshire cases during this period.

CHILDREN'S SERVICES:

This year has seen an unprecedented increase in referrals to the Early Help and Assessment Team (EHAT) who form the 'front door' entry point into Children Services. There was a 22% increase in Duty to Reports (DTR's) into Children Service's, against a national rise of 11% across Wales. Of this 22% increase, 68% were considered of a Child Protection in nature. The impacts of this increase was noted in the CIW inspection (Feb 2024) which reported that whilst Child Protection Enquiries were completed in statutory timescales and children safeguarded there was less time for strength-based engagement with parents and children.

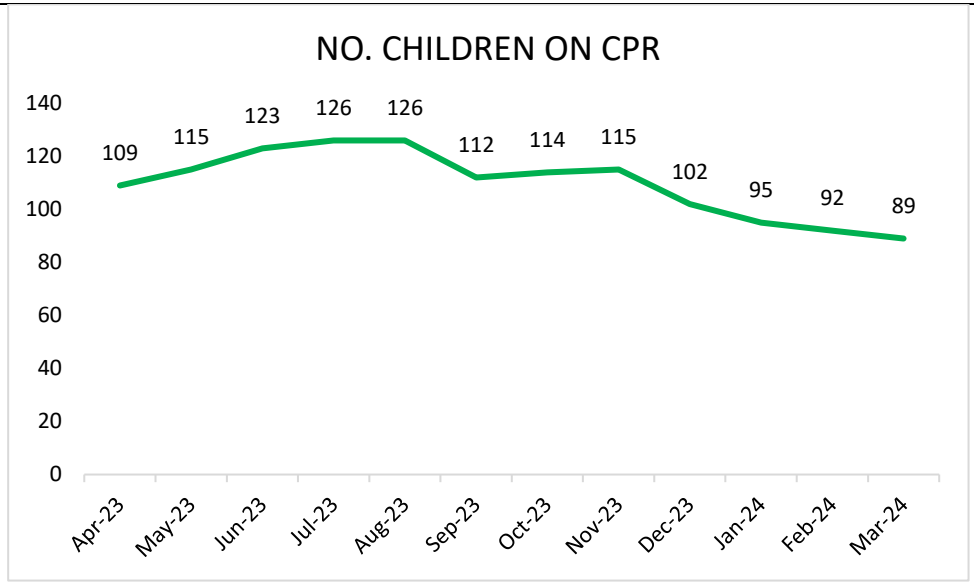
There has been a year-on-year increase in reports to both the EHAT since the Covid pandemic with limited increase in resource to manage the demand; however, the Service continues to demonstrate that 100% of reports are appropriately managed within the 24hour statutory guidance.

The Police remain the source of the highest number of DTR's, however, there has been a significant increase in reports from Health and Education. To better understand the increase in DTRs, a review of demand at the front door is scheduled to commence May 2024 with the appointment to a Safeguarding Implementation Lead and the recruitment of a new Safeguarding Service Manager in process to assist with this.

During the period, 67% of Child Protection visits were undertaken within statutory timescales against a national average of 73%. Whilst noting this did not mean that children subject to a Child Protection Plan were not being visited or safeguarded, improving statutory compliance is a key recommendation of the inspection report. This has led to an increased focus on digital technology to support the recording of statutory visits, as well as increased training and mentoring for social workers.

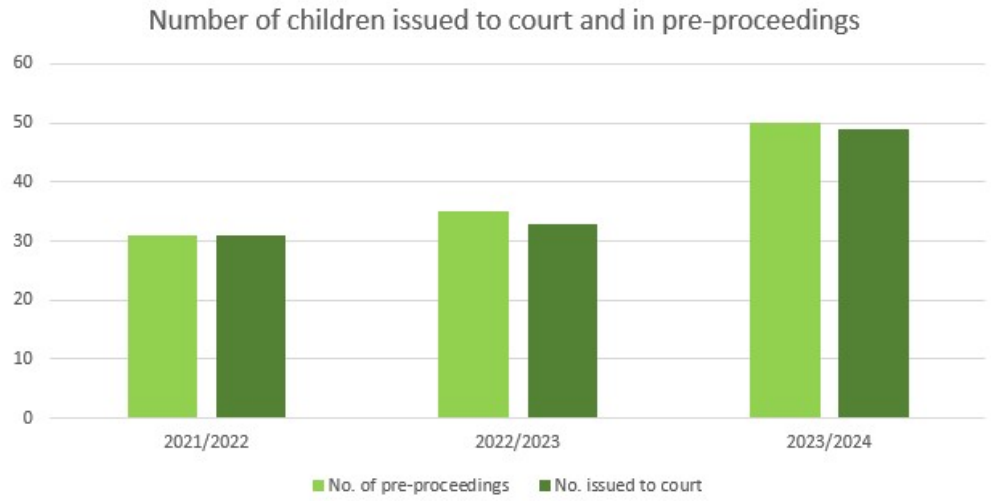
CHILD PROTECTION:

- During this period there was a reduction in the number of children on the Child Protection Register at year end, however this fluctuates each month as children, sometimes large sibling groups, either come onto, or off, the register.
- In some cases, preventative work of around 12-weeks is undertaken with families so that if it is possible to do so, children can be safely diverted from formal child protection arrangements. 210 children received this support during the year, with 122 children's cases either closing or stepping down to universal services. 56 children were transferred to the longer-term teams for continued support with 32 children subsequently progressing to Child Protection Conference.
- The graph below demonstrates number of children registered over the year.



- In 78% of cases, children were de-registered because of a reduction of risk rather than matters escalating through Care Proceedings and/or children becoming Looked After.
- Emotional Abuse is now the highest category of registration which relates to the impact of Domestic Abuse, Interparental conflict, Substance Misuse of parents and parental mental health. Child neglect remains the 2nd largest category of registration.
- Sexual abuse has always presented as a category with the least number of children registered, although under reporting is likely to mask prevalence. There had been an increase in child protection cases where parents [normally fathers] are under investigation or convicted of online offences, such as possession of indecent images of children.
- The Safeguarding Unit lost 2 key members of the team later in the year which led to a reliance on agency chairs being utilised for Child Protection Conferences. This led to a lack of consistency in the quality of engagement with families by the chair during the conference process. These posts are in the recruitment process.
- Delays in some conferences occur when the right agencies relevant to the family's case are not able to attend. This is something that is being looked at through the regional Safeguarding Board.

Children Services continue to experience increased levels of complexity for children and families, which is indicated by an increase in pre-proceedings work and numbers of applications made to court in order to keep children safe.



For Children on the Child Protection Register and in pre legal proceedings CIW Inspection report (Feb 24) notes: "leaders *provide constructive challenge to support consideration of all options. Social workers consistently create assessment plans which support analysis of the core risks relating to threshold, the impact on the child, and parental capacity to change. This* ***positive practice*** *supports robust analysis and proportionate decision making in the latter stages of a child's journey through safeguarding processes"*

CHILDREN'S PLACEMENTS:

Sufficiency of Children's Placement remains a key risk for the Council with instability within the provider market and on-going uncertainty as to the full impact of the new Social Care and Health Bill.

Insufficiency can mean that children are not as well matched to placements as we would want. Insufficiency of foster carers has meant that some children are entering residential children's homes, when the need is actually for a foster placement.

On occasions the service has had to operate an unregulated OWR placement (Outside of Welsh Regulation) to ensure that the child is safeguarded, whist an alternative registered placement can be found. Children Services proactively engage with CIW in these situations.

Children Services have improved the way that the service responds in situations where an OWR placement is required through temporarily redirecting resources and co-ordinating multiagency support. The service has developed a 'bank' of trained support workers who can support children within OWR homes at short notice. This allows Childrens Services to ensure the staff managing the placements are appropriately trained and supervised, and work collaboratively to meet the needs of the child whilst placed. In 2023/24, 5 children were placed temporarily in OWR arrangements prior to transitioning to a regulated placement.

In response to the challenges of placements, and in line with the Government's Elimination of Profit agenda, the service has developed a placement development strategy and is planning to appoint an additional Service Manager to support this area of work.

ADULT SAFEGUARDING:

The Adult Safeguarding Team remains relatively stable. Since the last evaluation the team has consolidated systems and process changes implemented in 2022/2023. This has helped to improve communication, recording and efficiency within adult safeguarding.

- In 2023/2024, 84.3% (334 of 396) of adult safeguarding enquiries were completed within 7 working days from receipt of the DTR compared to 86.4% last year. Although this is a slight reduction on last year, the improvements made in collaboration and partnership working across Adult Services and with relevant stakeholders, to ensure enquiries are undertaken in a timely way has been sustained.
- The number of referrals made and accepted to Adult Safeguarding has reduced slightly since the last evaluation, (from 418 to 396). However, the level of activity remains fairly consistent.
- The Team continues to improve how reports are responded to supporting and promoting preventative practice where it is safe to do so.
- The Adult Safeguarding Team, in collaboration with the Workforce Development Team, has developed a suite of Safeguarding Practice Exchange presentations on various topics to address learning needs. Further take up now needs to be promoted. The presentations developed are now also being taken forward by the wider workforce development agenda of the Gwent Safeguarding Board.

- The Team has continued to see an increase in relation to safeguarding concerns about People in a Position of Trust (see Safe Workforce). This increase is also seen within the other Gwent Local Authorities.

5. SAFE SERVICES – delivered through commissioning arrangements, grants, partnerships and volunteering

SELF-ASSESSED SCORE = 4

WHAT DOES GOOD LOOK LIKE?

We use our influence to ensure that services operating in Monmouthshire, including commissioned and those outside the direct control of the Council, do so in ways which promote the welfare and safety of children and adults at risk.

ANALYSIS

There are clear operating processes in place within Social Care and Health to ensure a robust approach for all social care commissioning for children and adults. There is good evidence of safeguarding practice within Licensing, Public Protection and Passenger Transport Units. Outcomes from SAFEs indicate that safe commissioning and good safeguarding practice with contractors is in place within schools and other services within the Council. Arrangements are in place to support safeguarding within volunteering and third sector organisations.

The score remains at 4.

KEY STRENGTHS:	NEXT STEPS:
- Commissioning team and the Safeguarding Unit have positive relations and the 'Provider Performance' and 'Escalating Concerns' processes continue to work well. - The processes for reviewing commissioned services within Children and Adult Services are well defined and embedded.	- Use of SAFES to continue learning and improvement in safe commissioning practice within Directorates. - Undertake a further check to ensure that Hiring and Letting processes adhere to Safeguarding policy.

- There are regular safeguarding meetings with individual directorates to offer ongoing advice and guidance.	

PROGRESS AND EVIDENCE:

COMMISSIONING & QUALITY ASSURANCE

Children's Services

Standard quality assurance monitoring processes continued during the year for residential and supported accommodation placements. This includes an annual monitoring visit to all in-county providers (for those new in placement this occurs between 6-12 months after placement start date) with additional follow up visits as needed. For those children placed out of area desktop monitoring is carried out for all providers, starting from 6 months after placement start date, and revisited 6 monthly - physical visits will occur as needed on a risk assessed basis. The national commissioning consortium supports good exchange of information about provider performance and any safeguarding concerns across local authorities.

During the 23 – 24 period we had:

- 1 Disability Support Service Provider in Provider Performance this concluded positive in April 2024
- 1 Residential Home in Provider Performance which is ongoing

Adults Services

Standard quality assurance monitoring processes continued during the 23-24 year for all commissioned Adult Social Care placements. For in-county placements this includes an annual monitoring visit and one to two relationship visits per year (if needed, dependent on provider size) with additional follow up visits as needed. In most circumstances, out of county providers are monitored via their host authority; in exceptional circumstances where no one from the host authority is placed we will liaise accordingly to ensure that monitoring occurs. Our regional commissioning group ensures that there is good exchange of information about provider performance and so that any concerns are responded to.

During the 23 – 24 period we had:

- 1 younger adult nursing home – managed through provider performance and then escalating concerns – the home was closed in April 2024
- 1 older adult residential provider in Provider Performance – this in ongoing

VOLUNTEERS: Regular volunteers in Monmouthshire are subject to the same recruitment procedures as the paid workforce. In the 2023-24, Be Community (part of the Wellbeing Team) provided substantial support to 244 volunteers and 135 community organisations in Monmouthshire, enhancing their resilience and sustainable growth through a diverse array of training which includes mandatory safeguarding training. A total of 38 training courses were provided to volunteers. 2 Voluntary workers were subject to the Professional Concerns Safeguarding processes in 23-24, where the concerns were "Substantiated". Appropriate steps were then taken to ensure that the risks posed by these individuals were mitigated.

LICENSING and PASSENGER TRANSPORT:
Good safeguarding practice is embedded within licensing services and the Passenger Transport Unit (PTU). Licensing & Regulatory (L&R) Committee members are trained and competent in making decisions about suitability of taxi drivers, etc. New Members in the Licensing and Regulatory Committee were also trained prior to dealing with cases brought before them, to ensure that only 'fit and proper' drivers are licensed.

DBS checks are now required every 6 months for drivers, rather than 3 years. This also includes operators who have access to book records or dispatch vehicles. This was implemented October 2021 and continues. Drivers are required to undertake safeguarding training which must be updated every 3 years when they reapply for their licence.

Responsible Authority meetings are well attended and continue to review any licensed premises with safety issues.

HIRING AND LETTING:
The Corporate Safeguarding Policy highlights that managers have responsibility for ensuring organisations letting or hiring rooms are operating to clear safeguarding policies, such that would reflect the Monmouthshire Safeguarding policy. This recognises that when rooms or buildings are let by the Council for clubs or activities, the public may well assume the same safeguarding standards are in place. There is a model hire agreement for schools for when other organisations use or hire sites. This includes reference to safeguarding standards such as having a

safeguarding policy, DBS checks being in place, safeguarding training and regulatory bodies etc. Arrangements are monitored by Governing Bodies.

Physical site security and incident planning:

School site security continues to be a paramount consideration for schools and services operated by MonLife – ensuring that those on site are safeguarded and that effective arrangements are in place.

In January 2024 the review of the Schools Critical Incident Plan (SCIP) was launched, and every school attended the launch event. Following this, each school reviewed their SCIP and reinforced how the arrangements were embedded into schools – for example 'safe and secure' (school lockdown) is routinely practiced, which is the opposite to evacuation procedures.

Schools assure themselves in relation to site safeguards and security via the SAFE assessment –with some sections amended to reinforce Estyn standards and monitoring arrangements.

APPENDIX 3 - SAFEGUARDING ACTIVITY PLAN [2023 – 2024]:

ACTION	RESPONSIBILITY	TIMEFRAME	RAG RATING	NOTES
GOOD GOVERNANCE				
Regional SAFE roll out 2023 – 2025.	All Directorates	March 2025		Commenced
Corporate Safeguarding Policy to reviewed when updates arise i.e. the National Safeguarding Training Framework 2023/4 and Modern-Day Slavery Statement.	Safeguarding Unit	March 2024		Modern Day Slavery Statement almost at completed with one further meeting scheduled between Commissioning and Safeguarding Unit (bring forward) Policy amended in line with new National Training Standards (Nov '23)
Consideration for further training and understanding of safeguarding priorities for all elected members.	Training Unit	March 2024		Awaiting module under the National Standards Training framework and will be addressed via this mechanism (bring forward)
SAFE WORKFORCE				
Ongoing development of 'Thinqi' to ensure training records are centrally managed	Systems and Data Team	March 2024		On-going
Training Policy needs to look at mandatory training and consider other areas that need to be recorded, including VAWDSV, Prevent and GDPR	Safeguarding Unit	March 2024		This is included as part of Thinqi development.
Regional Safeguarding Leads will continue to meet to review the Practitioner	Safeguarding Unit Gwent Safeguarding Board	March 2024		A task and finish group is established under the regional board to look at this. This action will be managed via that process.

ACTION	RESPONSIBILITY	TIMEFRAME	RAG RATING	NOTES
Concerns process and review the effectiveness of the "outcomes" of the process				
Undertake an audit of the adapted arrangements for digital recruitment to ensure safeguarding is at the forefront	Systems and Data Team	March 2024		Sequenced to 24-25 due to ongoing developments in other areas (Bring Forward)
Training to be developed around understanding of Practitioner Concerns, for those who are employers and those who are at greater risk of being discussed in the arena, eg Education, Foster Carers and Health professionals	Safeguarding Unit Gwent Safeguarding Board	March 2024		(Bring Forward)
Training Standards to be considered from a Monmouthshire perspective. Consideration to adopt this national framework.	Safeguarding Unit WASG Training Unit	March 2024		Adopted and policy amended
PREVENTATIVE APPROACH				
Development of VAWDASV refresher course for all staff and to be rolled out across the Council.	Training Unit	March 2024		VAWDASV training is incorporated into Thinqi mandatory training requirements and will be reviewed alongside the National Safeguarding Training Framework 24-25
There will continue to be promotion of all mandatory training across the Local Authority to be completed by staff members.	Training Unit Workforce Development Team	March 2024		This will be achieved via Thinqi

ACTION	RESPONSIBILITY	TIMEFRAME	RAG RATING	NOTES
Remainder of Directorates to be included in Modern Day Slavery training.	Safeguarding Unit	March 2024		This is ongoing.
Wellbeing Team to continue to support the community in ensuring robust support and effective links with services are provided based on the changing needs of the community.	Wellbeing Team	March 2024		Business as usual
Wellbeing Team to evaluate the effectiveness of their support to inform future decisions about the Team.	Wellbeing Team	March 2024		Wellbeing Team has undergone significant changes over the course of the last 12 months. The team, known now as The Community Development Team, operate geographically across the County, with an emphasis on early intervention and prevention
The Modern-Day slavery statement needs to be completed and embedded across the council.	Procurement Safeguarding Unit to offer advice and guidance	March 2024		Modern Day Slavery Statement almost at completion; one further meeting scheduled with Commissioning and Safeguarding Unit.
NRM pilot and change in threshold to be understood in greater depth.	Safeguarding Unit	March 2024		Pilot on-going, this will be taken forward at a national level
ROBUST PROTECTION				
The Hub will be evaluated following successful tender, which is being commissioned by Gwent Police.	Safeguarding Unit Gwent Police	March 2024		This is the remit of Gwent Police; hubs are now embedded with West and East oversight boards established.

ACTION	RESPONSIBILITY	TIMEFRAME	RAG RATING	NOTES
Continue to expand the Hub to include further agencies.	Safeguarding Unit	March 2024		This remains on going and has been enhanced through digital platforms.
Continued improvement of the Section 126 enquiries being held within timescale through further discussion with other professionals and agencies, such as Health.	Safeguarding Unit [Adult] Health Safeguarding	March 2024		Improved performance and compliance to statutory timescales has been maintained over 2 years.
Safeguarding Unit to continue improving Quality Assurance arrangements and identify workshops for practice improvement.	Safeguarding Unit	March 2024		This is being taken forward via the implementation lead.
Increased development of Safeguarding understanding across Adult Services.	Safeguarding Unit	March 2024		This has been achieved with practitioner modules being developed.
SAFE SERVICES				
To further strengthen the working relationship between Safeguarding and Commissioning for both Children and Adults and also include better attendance at meetings.	Safeguarding Unit Commissioning	March 2024		There are strong working relationships between Children's Services and Commissioning. In regard to Adult Services there are improved relationships and understanding with the Commissioning Team and better attendance at all levels of Safeguarding meetings.
Commissioning to review services on provider list and provider feedback.	Commissioning	March 2024		Continuous review process; ongoing.

ACTION	RESPONSIBILITY	TIMEFRAME	RAG RATING	NOTES
Further promotion and understanding of SAFE process across the whole Local Authority.	Safeguarding Unit	March 2024		Ongoing, and will be reinforced during next roll out
Safeguarding Unit to promote that Directorates have more autonomy in completing their individual SAFEs with advice and guidance to be sought from the Safeguarding Unit where necessary.	Safeguarding Unit All Directorates	March 2024		Ongoing – brought forward into Good Governance
Continued learning and improvement with Directorates to further embed good Safeguarding practice.	Safeguarding Unit All Directorates	March 2024		WASG is used as a mechanism to identify any learning.
Evaluation of the Wellbeing Team.	Wellbeing Team	March 2024		Wellbeing Team has undergone significant changes over the course of the last 12 months. The team, known now as The Community Development Team, now operates geographically across the County, with an emphasis on early intervention and prevention.

APPENDIX 4 - SAFEGUARDING PROPOSED ACTIVITY PLAN [2024 – 2025]:

ACTION	RESPONSIBILITY	TIMEFRAME
GOOD GOVERNANCE		
Regional SAFE roll out 2023 – 2025.	Directorate Leads Safeguarding Unit	March 2025
Directorates to develop increased autonomy in completing their individual SAFEs, with advice and guidance to be sought from the Safeguarding Unit where necessary.	Directorate Leads	March 2025
Recruitment of a Safeguarding Service Manager.	Head of Children's Services	July 2024
Ensure correct link between Thinqi and the implementation of the National Training Standards to include Safeguarding training for Elected Members and School Governors	Workforce Development Team and Safeguarding Unit	March 2025
Continue to develop the core data set as a standard agenda item for WASG to ensure whole council scrutiny.	Safeguarding Unit	Sept 2024
SAFE WORKFORCE		
Thinqi system to be fully implemented across all areas of the council to support full and accurate production of safeguarding training data.	Systems and Data Team Workforce Dev Team Safeguarding Unit	Dec 2024
National Training Standards to be embedded with Thinqi	Workforce Development Team and Safeguarding Unit	March 2025
To review and implement any actions arising from the national task and finish group developing further guidance around Practitioner Concerns.	Safeguarding Unit Safeguarding Board	March 2025
Undertake an audit of the adapted arrangements for digital recruitment to ensure safeguarding is at the forefront (brought forward from 2023-24)	Systems and Data Team HR	Jan 25
Training and Guidance to be developed around understanding of Practitioner Concerns, for those who are employers and those who are	Safeguarding Unit Gwent Safeguarding Board	March 2025

ACTION	RESPONSIBILITY	TIMEFRAME
at greater risk of being discussed in the arena, eg Education, Foster Carers and Health professionals (brought forward from 2023 -24)		
PREVENTATIVE APPROACH		
Strengthen the links between the Wellbeing Team, the Safeguarding Unit and MEG.	Safeguarding Unit	March 2025
MEG to work with partners both regionally and locally to develop transitional safeguarding to support young adults vulnerable to exploitation	Safeguarding Unit	March 2025
Complete the Modern-Day slavery statement and update the Corporate Safeguarding Policy	Safeguarding Unit and Community Development Service	Dec 2024
Support Gwent Police in recruiting for MARAC Chairs across the 5 LA's (to support consistency of practice)	Procurement Safeguarding Unit to offer advice and guidance	Dec 2024
Include Neuro Diversity in the training profile for PREVENT		March 2025
Implement Thinqi to support compliance with VAWDASV training	Safeguarding Unit	Dec 2024
ROBUST PROTECTION		
Undertake an analysis of demand data at both front door of adults and children to identify trends, resource need and to inform partnership approaches.	Safeguarding Unit	Oct 2024
Undertake further planned engagement with Adult Services to promote safeguarding statutory compliance and understanding	Safeguarding Unit [Adult] Health Safeguarding	Dec 2024
Utilise a 12-month Implementation Officer post to support the roll out of Keeping Children Safe practice framework and to support compliance with statutory timescales	Safeguarding Leads Children Services	July 2024

ACTION	RESPONSIBILITY	TIMEFRAME
Appoint to Safeguarding Service Manager position	Head of Children's Services	July 2024
Recruit a 4th Service Manager to take forward the development of Monmouthshire Children and young people placements.	Head of Children's Services	July 2024
Review grant funded services to understand risks and resource need post 2025	Head of Children's Services	Dec 2024
Implement the Safeguarding QA Framework	Safeguarding Service Manager	Dec 2024
SAFE SERVICES		
Use of SAFES to continue learning and improvement in safe commissioning practice within Directorates.	Safeguarding Unit	March 2025
Undertake a further check to ensure that Hiring and Letting processes adhere to Safeguarding policy.	WASG	March 2025

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monmouthshire
sir fynwy

SUBJECT: Annual Director's Report 2023 / 2024, Social Care, Safeguarding and Health

Meeting: Council

Date: 24th October 2024

Divisions/ Wards Affected: All

Social Care & Health: Director's Report 2023/24

The report reflects the activity within Social Care and Health between the period April 2023 – March 2024.

Go to this Sway

1. PURPOSE:

1.1 To present to Joint Scrutiny the Annual Report 2023/24 from the Chief Officer for Social Care, Safeguarding and Health.

2. RECOMMENDATIONS:

2.1 For Council to receive and endorse the Annual Director's Report 2023/24.

2.2 That Council tasks the Chief Officer of Social Care, Safeguarding and Health to maintain focus on the priority actions as set out in Section 9 of the report.

3. KEY ISSUES:

3.1 Preparing and publishing an annual report of the Statutory Director of Social Services is a requirement under the Social Services and Wellbeing (Wales) Act (2014). The report is required to show how social care in Monmouthshire meets the requirements of the Social Services and Wellbeing Act and the Regulation and Inspection of Social Care (Wales) Act 2016. There is currently no standarised format for the report. A standard format has been issued by Welsh Government and will be the required format for next year.

3.2 This is the third Director's Report for the current Chief Officer for Social Care Safeguarding and Health. The report can be viewed via a SWAY format which is intended to be accessible to a wide range of people. It allows for interactive elements and for material to be presented in a variety of styles.

3.3 The overall purpose of the report is:

- To evaluate progress against our social care priorities during the year.
- To provide Members and residents with an evaluation of social care and health services, looking at how we are making a difference in peoples lives and our performance against key metrics.
- To provide an analysis of the ways in which the current operating context is impacting on services and to identify key risks and challenges.
- To inform Members and residents about how our services meet the standards and requirements under the Social Services and Wellbeing (Wales) Act (2014).
- To set out actions and priorities for 2024 – 2025.

3.4 The report has been developed with involvement from the service and includes contributions from the workforce and the people who use services. Evidence of performance, analysis and case material are combined to provide an extensive report covering many aspects of Social Services. The report relies on honest self-evaluation drawing on a range of both qualitative and quantitative data, triangulated where possible through external sources including direct feedback from people.

3.5 The report sets out the context in which we are working and provides analysis, commentary and evidence of work across many areas of the directorate. It provides an opportunity to reflect on what we are doing well as well as highlighting challenges, risk and areas where we need to change, develop or improve.

3.6 The report reflects the financial year from April 2023 to March 2024.

3.7 The report is set out in 9 sections.

- Section 1 - Basis of the Report
- Section 2 - Progress against the priorities from 2022 - 2023
- Section 3 - Overview of Children's Services
- Section 4 - Overview of Adults' Services
- Section 5 - Carers Service
- Section 6 - Complaints and Compliments
- Section 7 - More Than Just Words
- Section 8 – Workforce
- Section 9 – Next Steps, Key Challenges and Priorities

4. WELLBEING OF FUTURE GENERATIONS IMPLICATIONS (INCORPORATING EQUALITIES, SUSTAINABILITY, SAFEGUARDING AND CORPORATE PARENTING)

4.1 The report provides an appraisal of performance of the directorate's work on behalf of the Council with children, older people and people with disabilities or ill health. It identifies future priorities and how services might be developed to better support vulnerable people and people with protected characteristics. The report identifies the contribution social services to the Well-being of Future Generations Act and Social Services and Wellbeing (Wales) Act, particularly with regards to prevention and working in partnership.

4.2 The report provides analysis of performance and priorities related to safeguarding and corporate parenting, with regard to the work that is undertaken with children who are looked after and care experienced young people.

5. OPTION APPRAISAL:

N/A

6. EVALUATION CRITERIA:

6.1 The report provides a comprehensive analysis of the performance of Social Care & Health Services in 2023/24. The report draws on a range of evidence, including the performance indicators from the measurement framework under the Social Services and Well-being Act, alongside case material and qualitative evidence.

7. REASONS:

7.1 It is a legal requirement to publish an Annual Report.

7.2 To ensure that elected members are provided with the Chief Officer's evaluation of the performance and impact of Social Services in 2023/24; and are informed about the future priorities identified to deliver good quality and sustainable social care in Monmouthshire.

8. RESOURCE IMPLICATIONS:

8.1 The Annual Report sets out the financial context of social care and health and the outturn positions for 2024 for Children's and Adults' Services. The report identifies the financial context and the challenges of financial sustainability for the coming year and beyond in meeting the costs of social care services against the backdrop of reducing budgets and increasing demand for care and support.

9. CONSULTEES:

9.1 Performance and Overview Scrutiny Committee received the report on October 8th 2024. The Committee scrutinised the report. The discussion included the following points and questions raised by the Members:

- The reason for the significant increases in pressures and numbers requiring services in Monmouthshire was questioned; in particular, how the team is coping with the increased demand for services. The committee requested that the deep dive analysis on increased pressures be reported back to the committee.
- In terms of the decommissioning of Budden Crescent, members asked whether the council has achieved an equivalent level of service satisfaction since, and what progress has been made to improve the offer for those with complex needs.
- In relation to foster carers, it was asked whether increasing our offer to foster carers would result in savings as recruiting more foster carers would reduce the reliance on independent fostering agencies. Members further asked about the extent to which the financial impact of fostering on carers is factored into the offer.
- Members asked how they can share the good news and achievements of the social care team to the public in a sensitive manner.
- It was asked if there are enough resources to deliver the ambitious priority actions, and whether we are working closely with Llais Wales.
- Further detail was sought about the reasons for those questionnaire respondents who disagreed with the statements.
- Timescales were sought regarding reablement lists and practice solutions in relation to learning disabilities.
- Members asked for an update on Severn View Park care home and the ambition to open similar homes.
- Clarity was sought about the caseload numbers in Children's Care and newly qualified case workers, and whether there is comparison data with other local authorities.
- The Chair noted that the subject of healthy life expectancy, and asking what more can be done to build prevention and resilience, would be a good area for future scrutiny.

9.2 <u>Other consultees:</u>

- Cllr Ian Chandler, Lead Member for Social Care and Health Directorate

- Senior Leadership Team
- Diane Corrister, Head of Children's Serivces
- Jenny Jenkins, Head of Adults' Services
- Claire Robins, Transformation Service Manager
- Tyrone Stokes, Directorate Finance Manager

10. BACKGROUND PAPERS

None

11. AUTHOR:

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Chief Officer, Social Care safeguarding and Health.

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Summary of Performance Information

Metric Number	Metric	2020/21	2021/22	2022/23	2023/24
Front Door (Adults)					
AD/001b	The number of contacts for adults received by statutory Social Services during the year which were new contacts	5787	6633	6437	5951
AD/002	The number of contacts for adults received by statutory Social Services during the year where advice or assistance was provided	3961	4215	3808	3635
Front Door (Carers)					
CA/001	The total number of contacts to statutory social services by adult carers or professionals contacting the service on their behalf received during the year	226	272	351	352
CA/002	The number of contacts by adult carers received by statutory Social Services during the year where advice or assistance was provided	88	92	128	129

Adults Questionnaire	2018/19 Actual	2019/20 Actual	2020/21 Actual	2021/22 Actual	2022/23 Actual	2023/24 Actual
I have had the right information or advice when I needed it	81.8%	84.3%	82.5%	77.4%	75.1%	77.6%

Metric Number	Metric	2020/21	2021/22	2022/23	2023/24
Assessments and Plans (Adults)					
AD/004	The number of new assessments completed for adults during the year	2035	2177	2205	1929
AD/005	Of which:				
AD/005a	Needs were only able to be met with a care and support plan	721	826	671	486
AD/005b	Needs were able to be met by any other means	630	542	583	482
AD/005c	There were no eligible needs to meet	627	506	553	573
AD/012	The number of adults with a care and support plans at 31 March	1813	1728	1651	1580
Assessments and Plans (Carers)					
CA/004	The total number of carers needs assessments for adults undertaken during the year	132	196	192	147
CA/005	Of which:				
CA/005a	Needs could be met with a carer's support plan or care and support plan	39	48	58	34
CA/005b	Needs were able to be met by any other means	32	43	63	24
CA/005c	There were no eligible needs to meet	55	25	27	44
CA/008a	The number of adult carers with a support plan at 31 March	68	105	86	70
CA/008b	The number of adults with a care and support plan who also have carer responsibilities	41	64	50	50

Adults Questionnaire	2018/19 Actual	2019/20 Actual	2020/21 Actual	2021/22 Actual	2022/23 Actual	2023/24 Actual
I have been actively involved in decisions about how my care and support was provided	81.4%	83.1%	83.0%	77.4%	76.6%	78.1%
I feel that I was listened to	82.7%	86.5%	85.9%	81.4%	79.9%	80.4%

Metric Number	Metric	2020/21	2021/22	2022/23	2023/24
Early Intervention and Prevention					
AD/010	The total number of packages of reablement completed during the year	291	240	184	331
AD/011	Of which:				
AD/011a	Reduced the need for support	50	54	32	47
AD/011b	Maintained the need for the same level of support	45	36	35	74
AD/011c	Mitigated the need for support	171	122	106	183
AD/011d	Neither reduced, maintained nor mitigated the need for support	25	28	11	27
Local	*The percentage of packages of reablement completed during the year that mitigated the need for support*	*58.8%*	*50.8%*	*57.6%*	*55.3%*
AD/013	The total number of adults with a care and support plan where needs a met through a Direct Payment at 31 March	123	139	149	140

Adults Questionnaire	2018/19 Actual	2019/20 Actual	2020/21 Actual	2021/22 Actual	2022/23 Actual	2023/24 Actual
I am happy with the care and support I have had	88.3%	89.4%	89.0%	86.9%	83.5%	84.6%

Metric Number	Metric	2020/21	2021/22	2022/23	2023/24
Provision of Services and Reviews					
AD/016	The number of care and support plans for adults that were due to be reviewed during the year	-	2094	1717	1580
AD/017	The number of care and support plans for adults that were due a review in the collection year and were reviewed at least once during the collection year	-	1123	987	856
Local	*The percentage of care and support plans for adults that were due a review in the collection year and were reviewed at least once during the collection year*	-	*53.6%*	*57.5%*	*54.2%*
AD/030	The total volume of services provided on 31 March			1,380	1,368

Adults Questionnaire	2018/19 Actual	2019/20 Actual	2020/21 Actual	2021/22 Actual	2022/23 Actual	2023/24 Actual
The service I get is reliable and I'm told about any changes in good time	80.0%	81.5%	82.1%	75.8%	79.1%	78.4%
I usually get assistance from the same staff	67.8%	70.3%	70.1%	68.4%	71.3%	70.3%
Do you think that the care and support you get still meet your needs?	92.4%	92.8%	91.2%	87.9%	87.0%	89.4%

Metric Number	Metric	2020/21	2021/22	2022/23	2023/24
Adult Safeguarding					
AS/001	Number of adults suspected of being at risk of abuse or neglect reported during the year	463	528	438	441
AD/020	The total number of reports of an adult suspected of being at risk received during the year	680	799	577	586
AD/022	The total number of reports received during the collection year where it was alleged that there was abuse under the primary category of:				
AD/022a	Neglect	258	344	242	286
AD/022b	Physical abuse	260	269	229	210
AD/022c	Sexual abuse	35	56	27	41
AD/022d	Emotional or Psychological abuse	176	214	145	160
AD/022e	Financial abuse	106	97	114	102

AD/023	The total number of reports of an adult suspected of being at risk where it is necessary for enquires to be made	509	583	418	396
AD/024	The total number of enquiries completed within 7 working days from the receipt of the reported alleged abuse	262	382	361	334
Local	*The percentage of enquiries completed within 7 working days from the receipt of the reported alleged abuse*	*51.5%*	*65.5%*	*86.4%*	*84.3%*

Adults Questionnaire	**2018/19 Actual**	**2019/20 Actual**	**2020/21 Actual**	**2021/22 Actual**	**2022/23 Actual**	**2023/24 Actual**
I feel safe	81.8%	81.1%	78.8%	78.3%	81.3%	**80.6%**

Metric Number	Metric	2020/21	2021/22	2022/23	2023/24
Prevention and early intervention (Children)					
Local	Percentage of families supported by early help services who report being helped with matter to them (pre statutory services)	84%	84%	87.5 %	100%

Metric Number	Metric	2020/21	2021/22	2022/23	2023/24
Front Door (Children)					
CH/001	The number of contacts for children received by statutory Social Services during the year	4329	5776	5825	7071
CH/002	The number of contacts for children received by statutory Social Services during the year where advice or assistance was provided	2700	3379	3508	3879
CH/003	The number of contacts received by statutory children's social services during the year where a decision was made by the end of the next working day	3042	5769	5698	7065
Local	*The percentage of contacts received by statutory children's social services during the year where a decision was made by the end of the next working day*	*70.3%*	*99.9%*	*97.8%*	*99.9%*
Front Door (Young Carers)					
CA/011	The total number of contacts to statutory social serviced by young carers or professionals contacting the service on their behalf received during the year	143	233	259	282
CA/012	Of those identified, the number where advice and assistance was provided	61	86	106	157

Metric Number	Metric	2020/21	2021/22	2022/23	2023/24
Assessments (Children)					
CH/006	The total number of new assessments completed for children during the year	828	884	907	1088
Local	*The percentage of new assessments completed for children during the year where:*				
Local	*Needs were only able to be met with a care and support plan*	*30.1%*	*29.9%*	*27.9%*	*34.4%*
Local	*Needs were able to be met by any other means*	*54.1%*	*48.0%*	*54.4%*	*48.0%*
Local	*There were no eligible needs to meet*	*3.1%*	*1.9%*	*1.8%*	*3.2%*
Local	*The percentage of assessments for children completed during the year where there is evidence that the child has been seen*	*95.1%*	*96.9%*	*98.3%*	*98.3%*
Local	*The percentage of new assessments completed for children during the year that were completed within statutory timescales*	*87.1%*	*91.2%*	*92.3%*	*95.9%*
Assessments (Young Carers)					
CA/014	The total number of young carers needs assessments undertaken during the year	36	40	29	16
CA/015	The total number of young carers needs assessments undertaken during the year where:				
CA/015a	Needs could be met using a young carer's support plan or care and support plan	16	18	10	12

CA/015b	Needs were able to be met by any other means	13	11	11	4
CA/015c	There were no eligible needs to meet	0	0	1	0

Metric Number	Metric	2020/21	2021/22	2022/23	2023/24
Plans (Children)					
CH/015a	The number of children with a care and support plan at 31st March	515	518	542	502
Local	*The percentage of children supported to remain living within their family*	*58.6%*	*59.8%*	*61.1%*	*60.2%*
CH/016	The total number of children with a care and support plan where needs are met through a Direct Payment at 31st March	48	54	51	55
CA/017b	The number of children or young people with a care and support plan who also have carer responsibilities	22	34	32	28
Local	*The percentage of reviews due during the year that were completed within statutory timescales, which were:*				
Local	*Child protection reviews*	*94.2%*	*96.0%*	*84.0%*	*81.7%*
Local	*Looked after reviews (including pathway plan reviews and pre-adoption reviews)*	*99.8%*	*98.6%*	*99.0%*	*99.6%*
Local	*reviews of children in need of care and support (including children supported by a direct payment)*	*67.3%*	*66.3%*	*65.4%*	*77.1%*

Metric Number	Metric	2020/21	2021/22	2022/23	2023/24
Safeguarding Children					
CH/021	The number of Strategy Meetings held during the year that progressed to Section 47 enquiries	453	630	641	729
CH/022	The total number of Section 47 enquiries completed during the year that progressed to Initial Child Protection Conference	113	176	145	153
Local	*The percentage of initial child protection conferences held during the collection year that were held within statutory timescales*	*42.6%*	*23.6%*	*79.3%*	*79.7%*
CH/026a	The total number of children on the child protection register at 31st March	60	123	113	89
CH/027	The total number of initial core group meetings held during the year	78	131	127	134
CH/028	The total number of initial core group meetings held during the year that were held within statutory timescales	72	120	112	120
Local	*The percentage of initial core group meetings due during the year that were held within statutory timescales*	*66.7%*	*76.4%*	*86.8%*	*89.6%*
CH/029	The total number of visits to children placed on the child protection register that were due during the year	2115	2161	2566	2533

Local	*The percentage of visits to children placed on the child protection register that were due during the year that were completed*	-	-	*65.0%*	94.6%
Local	The percentage of visits to children placed on the child protection register that were due during the year that were completed within approved timescales	*66.6%*	*58.1%*	*37.5%*	*63.6%*
Local	*The percentage of re-registrations of children on local authority Child Protection Registers (CPR)*	*5.6%*	*0.6%*	*4.7%*	*0.7%*
Local	The average length of time for all children who were on the CPR during the year	*302*	*215*	*263*	*283*

Metric Number	Metric	2020/21	2021/22	2022/23	2023/24
Children Looked After and Care Leavers					
Children Looked After					
CH/039	The number of children looked after at 31 March	213	208	211	200
Local	*Number of Children Adopted during the Year*	*1*	*9*	*10*	*7*
Local	*Number of Children Leaving Care with Special Guardianship Orders during the Year*	*11*	*13*	*9*	*23*
Local	*Number of Generic Foster Carers at 31 March*	*38*	*40*	*39*	*38*

Local	*Percentage of Looked After Children placed with MCC generic or kinship foster carers at 31 March*	*41.3%*	*41.3%*	*42.2%*	*36.5%*
CH/043	The total number of children looked after at 31 March who have experienced three or more placements during the year	9	14	16	Not available
CH/044	The total number of children looked after on the 31 March who have experienced one or more changes of school during the year (excluding transitional arrangements, moves associated with adoption or moves home)	15	8	17	11
Care Leavers					
CH/052	The total number of care leavers who experience homelessness during the year (As defined by the Housing (Wales) Act 2014) within 12 months of leaving care	4	4	5	8
CH/053	The total number of care experienced young people in categories 1 to 6 at the 31 March	64	60	73	77