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Wednesday, 20 September 2023

Notice of Reports Received following Publication of Agenda.

Place Scrutiny Committee

Thursday, 28th September, 2023 at 10.00 am,
The Council Chamber, County Hall, The Rhadyr, Usk, NP15 1GA with remote attendance

Attached are reports that the committee will consider as part of the original agenda but were submitted to democratic services following publication of the agenda.

Item No	Item	Pages
4.	Replacement Local Development Plan Preferred Strategy - To scrutinise the RLDP Preferred Strategy, including any proposed changes arising from the public consultation.	1 - 354
5.	Place Scrutiny Committee Forward Work Programme.	355 - 358

Paul Matthews
Chief Executive

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**SUBJECT: REPLACEMENT LOCAL DEVELOPMENT PLAN (RLDP)
PREFERRED STRATEGY**
MEETING: PLACE SCRUTINY COMMITTEE
DATE: 28 September 2023
DIVISION/WARDS AFFECTED: ALL

1. PURPOSE:

- 1.1 The purpose of this report is to facilitate pre-decision scrutiny on post-consultation amendments 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.

2. RECOMMENDATIONS:

- 2.1 That Place Scrutiny Committee scrutinises proposed post-consultation amendments to the Replacement Local Development Plan 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.

3. KEY ISSUES:

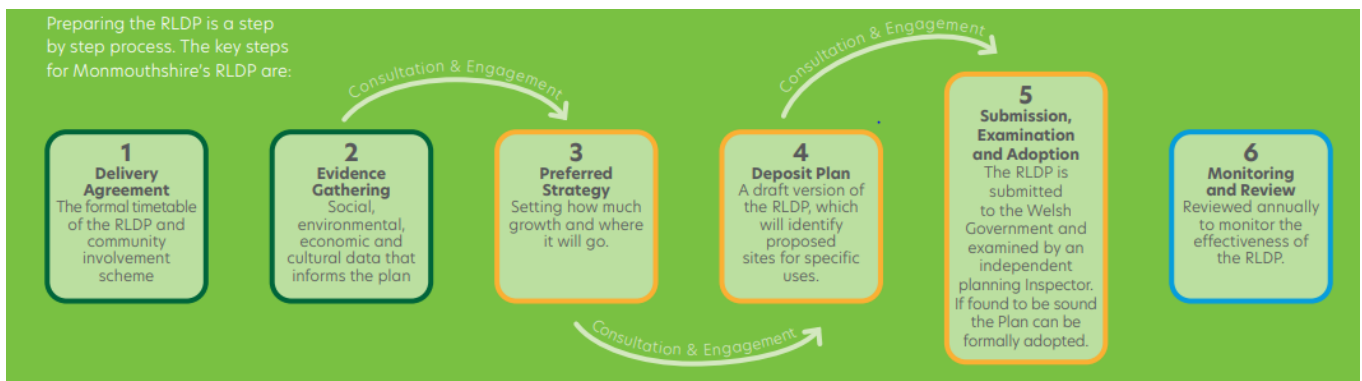
Background

- 3.1 The Council is 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 Brecon Beacons National Park. The current adopted LDP covered the period 2011-2021 but remains the planning policy framework for making decisions in Monmouthshire until the adoption of the RLDP.
- 3.2 The RLDP will identify where and how much new, sustainable development will take place to 2033, underpinned by a clear and robust evidence base. Early stages of the project identified 38 issues facing the communities we serve, based on a range of evidence including responses to consultation on the Public Service Board's Local Wellbeing Plan. The RLDP's issues, vision and objectives were subject of targeted engagement in January-February 2019 and were [reviewed](#) in the light of the subsequent Climate Emergency declaration by Council in May 2019. A [further review](#) in the light of the Covid-19 pandemic concluded that the Plan's strategic direction of travel remained relevant and identified a number of key messages that will require ongoing consideration as the RLDP progresses.
- 3.3 The seventeen Plan objectives are grouped to reflect the seven wellbeing goals (they are not listed in order of importance). However, as the Plan has developed, three core objectives have become apparent: delivering affordable homes to help address

inequality, rebalancing the County's demography to ensure communities are socially and economically sustainable, and responding to the climate and nature emergencies to ensure proposals are environmentally sustainable.

- 3.4 Figure 1 below shows the key steps in the RLDP process. Although the Preferred Strategy is the first statutory consultation stage in the RLDP preparation process, the Council chose to engage from the outset and consulted on the issues, vision and objectives, and the growth and spatial options stages.

Figure 1: Key Steps in the RLDP Process



RLDP Preferred Strategy

- 3.5 The Preferred Strategy provides the strategic direction for the development and use of land in Monmouthshire (excluding the area within the Brecon Beacons National Park) over the Plan period 2018 to 2033 and identifies how much sustainable growth is needed and where this growth will broadly 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. It provides the strategic context for the preparation of more detailed policies, proposals and land use allocations which will be included in the Deposit RLDP.
- 3.6 The overall purpose of the Preferred Strategy is to:
- identify key issues, challenges and opportunities for the County (see Section 3 of the Preferred Strategy);
 - set out a vision and objectives for the RLDP that respond to the key issues, challenges and opportunities (see Section 4);
 - set out the scale of future growth in population, housing and jobs and establish the spatial distribution of growth (see Section 4); and
 - set out the Preferred Strategic Site Allocations and strategic policies to deliver/implement the strategy (see Section 5).
- 3.7 At its meeting on 1st December 2022, Council endorsed the Preferred Strategy for public consultation for an eight-week period between Monday 5th December 2022 and Monday 30th January 2023). This included:
- Direct contact with statutory consultees and those stakeholders who have asked to be included on the RLDP database (1000+ contacts);
 - Members' Workshop 2nd November 2022 (hosted by Place Scrutiny Committee);
 - Place Scrutiny Committee 10th November 2022;

- Internal discussions within the Council through an officer workshop, Department Management Team and Senior Leadership Team;
- Seven RLDP Preferred Strategy Drop-in Sessions during December 2022 – January 2023;
- Two virtual events open to all during December 2022 – January 2023; and
- Virtual event for Town and Community Councils in December 2022.

3.8 The consultation resulted in approximately 220 responses to the Preferred Strategy and 650 representations on the Candidate Sites register. Of significant note, the Welsh Government Planning Division’s response is supportive (**Appendix 1**).

3.9 As a result of the consultation, it is proposed to make a small number of key changes to the Preferred Strategy as set out below and as highlighted in an updated version of the Preferred Strategy (**Appendix 2**):

- Inclusion of 2022/23 data in the spatial distribution of housing table (Table 2, page 39 of the updated Preferred Strategy);
- Identification of a strategic site in Monmouth (pages 58 and 62 of the updated Preferred Strategy) in response to Dŵr Cymru Welsh Water investment and Welsh Government advice, together with changes to how the ‘bonus sites’ (page 37 of the updated Preferred Strategy) are factored into the housing figures;
- Changing the proposed strategic site in Chepstow (pages 58 and 61 of the updated Preferred Strategy);
- Increasing the proposed flexibility level from 10% to 15% and consequential adjustments to the spatial distribution of housing table (Table 2, page 39 of the updated Preferred Strategy) from the changes above;
- Accommodating the MoD’s needs for service family accommodation for the new Caerwent Barracks.
- Enhance the sustainability credentials and energy efficiency of the homes that are constructed to be net zero carbon homes rather than net zero ready homes to ensure that homes built within Monmouthshire do not result in additional carbon emissions in the atmosphere.

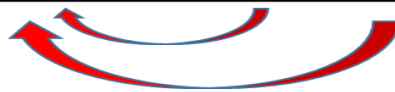
3.10 This report seeks scrutiny of the above proposed amendments prior to seeking Council endorsement of the updated Preferred Strategy as the basis for the Deposit Plan. Any proposed changes arising from Preferred Strategy consultation responses relating to the issues, vision, objectives and strategic policies will be included in the Deposit Plan for scrutiny in Spring 2024. The Deposit Plan will then be reported to Council in Spring 2024 for endorsement for public consultation.

Updated housing data

3.11 Each year, data is collected on housing completions and planning permissions. With time, homes will be completed on known sites with planning permission (existing commitments) and on small/windfall sites. As a result, homes will move left into the ‘completions’ column (red arrows). This table remains ‘live’ until the RLDP is at examination in public. NB the table below is taken from the December 2022 Preferred Strategy prior to the figures being updated.

Figure 3: Summary of Indicative Spatial Distribution of Housing Provision*

Settlement	Total Commitments		Preferred Strategy		Total Housing Provision 2018-2033*
	Completions 2018-2021	Existing Commitments	Total Allowances (Small Sites; Windfalls)	RLDP New Housing Allocations (Dwellings)	
Abergavenny (incl. Llanfoist)	426	132	245	600	1,403
Chepstow	192	267	165	145	769
Monmouth (incl. Wyesham)	264	11	0	0	275
Caldicot (incl. Severnside)	466	723	220	1,200	2609
Secondary Settlements	100	45	80	155	380
Rural Settlements	131	83	190	100	504
Total	1,579	1,261	900	2,200	5,940



Monmouth

3.12 The Preferred Strategy consultation in December 2022 and January 2023 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 can come forwards. 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.

3.13 It did, however, identify three sites as ‘bonus sites’ (not counted as part of the 5,940 homes) that would provide a small contribution to urgently needed housing, should a phosphate solution be found:

- Current LDP allocation at Tudor Road, Wyesham;
- Current LDP allocation at Drewen Farm, Monmouth; and
- Land at Rockfield Road with current planning application.

3.14 The Welsh Government’s response letter 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:

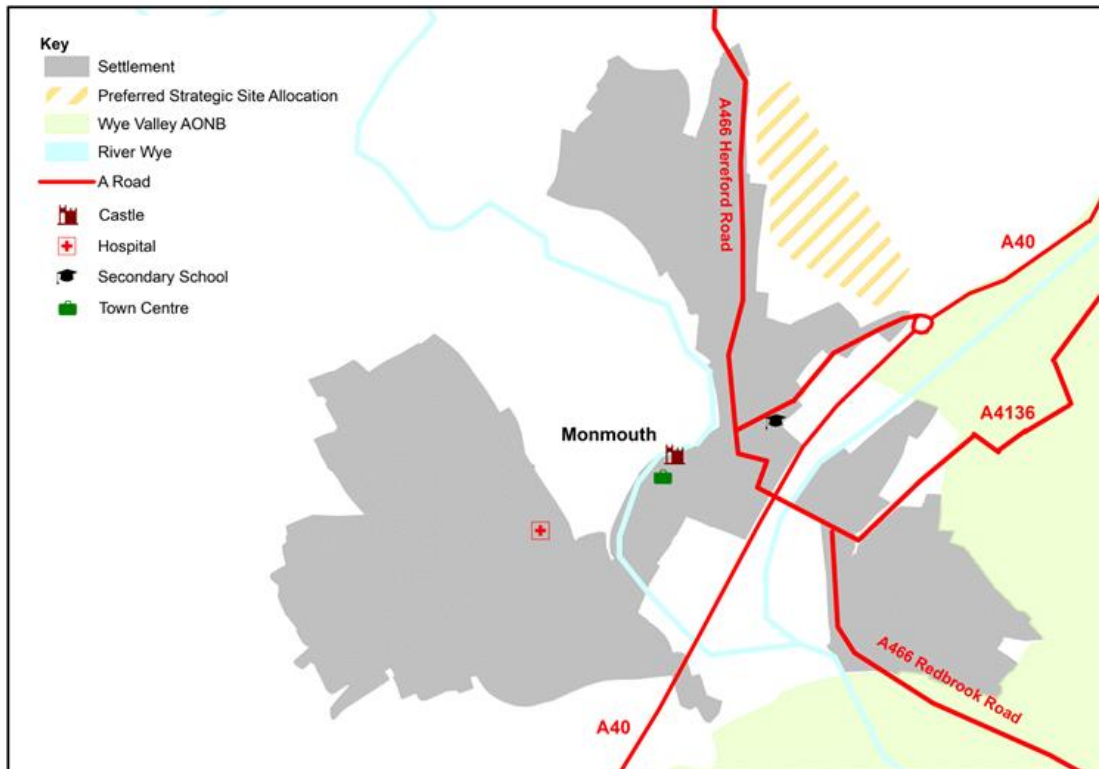
“Due to high phosphate levels in the Wye and Usk Welsh Water has made a commitment to improve the Wastewater Treatment facilities in Monmouth and Llanfoist. Improvements to both works are currently subject to design and regulatory approval. On the basis that improvement to both works to remove phosphates are planned it is appropriate to identify new affordable housing led allocations in both Monmouth and Abergavenny in the Deposit plan.”

3.15 The Welsh Government’s confidence in the removal of this spatial and environmental constraint means the RLDP can now allocate new affordable housing-led development within Monmouth. This will assist in addressing the Plan’s key objectives, including the delivery of much needed new affordable homes in the town, and allowing development that support the economic growth of the area.

3.16 In response, it is proposed to identify a new strategic site at Leasbrook, off Dixon Road in Monmouth for approximately 970 homes. This is in addition to the three

legacy sites named in paragraph 3.13 above, which can no longer be defined as 'bonus sites' but become a mix of commitments and a new allocation:

- Drewen Farm, Monmouth (adopted LDP site carried forwards) – approximately 110 homes
- Tudor Road, Wyesham (adopted LDP site carried forwards) – approximately 35 – 50 homes
- Rockfield Road, Monmouth (land with planning permission) – approximately 70 homes
- Rockfield Road, Monmouth (new allocation) – approximately 60 homes



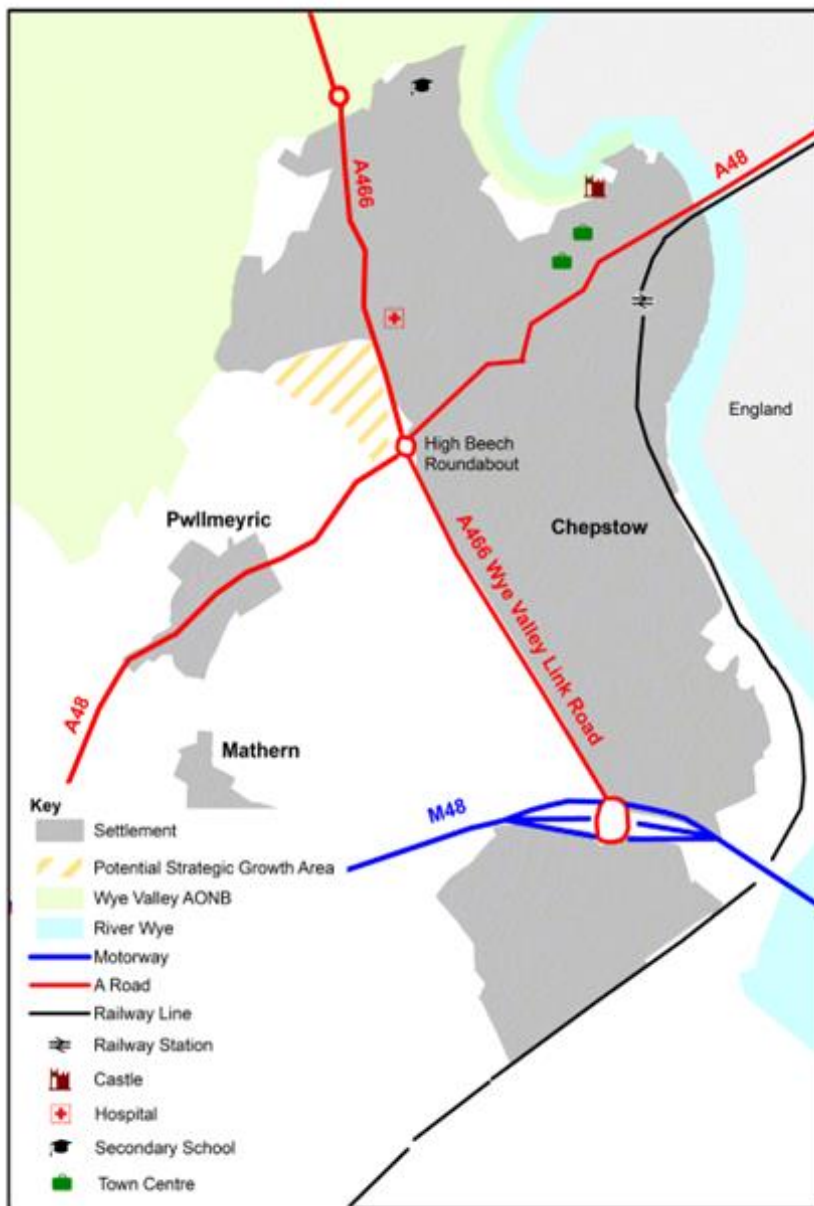
3.17 Cumulatively, this requires the redistribution of approximately 480 homes from the housing total. Part of this redistribution is achieved by reducing the scale of the Caldicot East strategic site from approximately 925 homes to approximately 735 homes. Of note, the site remains large enough to warrant an on-site primary school.

Chepstow

3.18 It is proposed to swop the strategic site in Chepstow from Bayfield, as shown in the consultation version of the Preferred Strategy, to Mounton Road in this updated version. The volume of housing would remain unchanged (approximately 145 homes). The pros and cons are summarised below.

Bayfield	Mounton Road
c.145 homes	c.145 homes plus commercial uses (scope for a hotel and care home)
c.28% best and most versatile agricultural land	c.72% best and most versatile agricultural land
Proximity to schools and leisure centre	Proximity to train station (and less steep topography) and to Bulwark local centre
Natural rounding off to the settlement boundary	Encroaches into current green wedge separating Chepstow from Pwllmeyric however sufficient buffer would remain
Adjacent to and visible from AONB	Setting of Listed Building

3.19 On balance, it is considered that the benefits of the commercial development and associated job creation outweigh the loss of higher quality agricultural land, given the absence of alternative commercial sites and the importance of Chepstow for tourism as the gateway to the Wye Valley.



Flexibility and consequential changes

- 3.20 It is proposed to increase the 10% flexibility rate to 15%. This increases the total number of homes planned for from 5,940 (5,400 + 10% flexibility) to 6,210 (5,400 + 15% flexibility), adding 270 homes to the total. This ensures 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.

MoD Caerwent proposals

- 3.21 The MoD proposals for Caerwent Barracks will require 100 homes on the Caldicot East strategic site to provide service family accommodation. These homes would be built or purchased by the MoD and would not be available to the general public, so would not count towards our 6,210 home total. There would be no affordable housing requirement for these 100 homes but there would be S106 contributions towards local infrastructure such as education and leisure.

Net Zero Carbon

- 3.22 Concerns have been raised regarding the use of the phrase 'net zero carbon ready' due to the potential for new homes to comply with this policy with very minimal improvements beyond Building Regulations requirements by relying on grid decarbonisation and needing retrofitted improvements in the near future. It is therefore proposed to enhance 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. Officers are currently investigating the specific detail of this planning policy considering the viability implications and delivery mechanisms associated with the aspiration to deliver this type of development at scale. The detail of the net zero carbon policy will be outlined within the Deposit Plan which will be subject to public consultation and engagement in Spring 2024.

Summary

- 3.23 As a result of the above proposed changes, the updated Preferred Strategy:
- **Makes provision for approximately 5,400 – 6,210 homes over the Plan period 2018-2033¹** (Strategic Policy S1). This includes approximately 1,580 - 1,910 affordable homes (Strategic Policy S6). As there are currently approximately 4,085 homes in the housing landbank², **land will be allocated for approximately 1,660 - 2,125 new homes**, including 830 - 1,065 new affordable homes.
 - Sets out the planning policy framework to **enable the provision of approximately 6,240 additional jobs** (Strategic Policy S1) **by allocating**

¹ The flexibility allowance will be given further consideration and refined at Deposit stage.

² 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 windfall sites and small sites.

sufficient employment land and by including policies to facilitate economic growth (Strategic Policy S12). The RLDP will be supported by an Economic Development Strategy.

- **Focuses growth in the County’s most sustainable settlements of Abergavenny, Caldicot (including Severnside), Chepstow and Monmouth** (Strategic Policy S2). **Preferred strategic sites** are identified to expand the Primary Settlements of Abergavenny, Caldicot, Chepstow and Monmouth (Strategic Policy S7). Other detailed site allocations will be set out in the Deposit RLDP.
- 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.
- **Sets out strategic policies** on a range of topic areas, reflecting the four placemaking themes in Planning Policy Wales (PPW)³.

3.24 Table 2 below summarises the indicative spatial distribution of the proposed housing growth over the Plan period. There are different components that contribute towards the 6,210 homes (5,400 plus 15% flexibility) including homes already built since 2018 (1,922 homes), sites with planning permission that will realistically be built (993 homes), small sites and windfalls (1,010 homes), and new site allocations (2,125 homes). To encourage the promotion of sustainable communities where residents can live and work in the same area, housing growth will be accompanied by a commensurate amount of employment land, details of which will be provided in the Deposit Plan.

Table 2: Summary of Indicative Spatial Distribution of Housing Provision*

Settlement	Total Commitments			Preferred Strategy		Total Housing Provision 2018-2033*
	Completions 2018-2023	Existing Commitments	LDP Rollover Allocations	Total Allowances (Small Sites; Windfalls)	RLDP New Housing Allocations (Dwellings)	
Abergavenny (incl. Llanfoist)	486	77	0	240	600	1,403
Chepstow	315	170	0	165	145	795
Monmouth (incl. Wyesham)	267	81	145	86	330	909
Caldicot (incl. Severnside)	591	587	0	192	825	2195
Secondary Settlements	104	38	0	79	120	341
Rural Settlements	159	40	15	248	105	567
Total	1,922	993	160	1,010	2,125	6,210

*Figures include an indicative 15% flexibility allowance which will be subject to further consideration and refinement at Deposit Plan stage. The spatial distribution may alter following detailed site assessment work.

3.25 The exact distribution of growth will be determined following the assessment of candidate sites which will inform the Deposit RLDP. Any decisions on whether or not to

³ PPW edition 11, WG, February 2011.

allocate particular sites for development in the settlements will also depend on such issues as their impact on the physical form of the settlement, placemaking, carbon footprint, landscape setting, environmental constraints and infrastructure capacity.

- 3.26 Policy S7 identifies Preferred Strategic Site Allocations for expand the Primary Settlements of Abergavenny, Caldicot, Chepstow and Monmouth (see Tables 3-6 in the updated Preferred Strategy).

Details of the Preferred Strategic Site Allocations

Site Name	Candidate Site Reference	Size (Ha)	Proposed Use	Approximate No. of homes within Plan period
Abergavenny East	CS0213	24.75	Mixed Use: Residential, Employment, Retail, Leisure, Education and Community Use	500
Mounton Road, Chepstow	CS0165	12.8	Residential	145
Leasbrook (land north of Dixon), Monmouth	CS0270	12.5	Residential	270
Caldicot East	CS0087 CS0251	94.57	Mixed Use: Residential, Employment, Retail, Leisure	735*

*MoD proposals for Caerwent Barracks will add 100 homes to Caldicot East to provide service family accommodation. These homes would be built or purchased by the MoD and would not be available to the general public, so would not count towards our housing total.

Supporting Documents

- 3.27 The Initial Integrated Sustainability Appraisal Report and Habitats Regulations Assessment of the Preferred Strategy will be published alongside the Preferred Strategy. The ISA and HRA are iterative processes and will be updated as the RLDP progresses towards adoption. The updates to the Preferred Strategy will be 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) as part of the Deposit Plan. The ISA assesses the extent to which the emerging proposals and policies will help to achieve the wider environmental, economic, social and cultural objectives of the RLDP. The updated Preferred Strategy will also be subject to a Habitats Regulations Assessment at Deposit Plan stage.
- 3.28 The RLDP will be accompanied by an Infrastructure Plan, setting out what is needed to support the development of the allocated sites, and will sit alongside an updated voluntary Local Transport Plan and an Economy, Employment and Skills Strategy. Together, these Plans will 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.

General Conformity with Future Wales 2040: the National Plan and ‘Soundness’

- 3.29 The Welsh Government response agrees that the level of growth set out in the Preferred Strategy 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, 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 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 growth strategy will assist in addressing our core issues without harming or compromising Welsh Government’s objectives for the wider South East Wales region. The updates do not change this position.
- 3.30 The updated Strategy continues to meet 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 the Plan’s vision and strategy are positive and sufficiently aspirational.

Consultation responses

- 3.31 A summary consultation report is attached at **Appendix 3** (response to the Preferred Strategy) and **Appendix 4** (response to the Candidate Sites register). The consultation resulted in approximately 220 responses to the Preferred Strategy and 650 representations on the Candidate Sites register. Any proposed changes arising from Preferred Strategy consultation responses relating to the issues, vision, objectives and strategic policies will be included in the Deposit Plan for scrutiny in Spring 2024. The Deposit Plan will then be reported to Council in Spring 2024 for endorsement for a statutory six-week public consultation.

4. EQUALITY AND FUTURE GENERATIONS EVALUATION (INCLUDES SOCIAL JUSTICE, 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 formal stages of the RLDP will be subject to an Integrated Sustainability Assessment (ISA) (including Strategic Environmental Assessment (SEA), Well-being of Future Generations (WCFG), Health Impact Assessment (HIA), Equality Impact Assessment (EqIA), and Welsh Language Impact Assessment (WLIA)). The ISA findings have informed the December 2022 Preferred Strategy and will be used to inform detailed policies and site allocations in the Deposit Plan, in order to ensure that the Plan will promote sustainable development. The Initial ISA Report was published alongside the December 2022 Preferred Strategy. The next iteration will be at Deposit Plan stage.
- 4.2 An Equality and Future Generations Evaluation (including equalities and sustainability impact assessment) is attached to this report at **Appendix 5**.

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 seek net zero carbon ready development to help address the climate and nature emergency and also tackle issues such as fuel poverty.

5. OPTIONS APPRAISAL

Option	Benefit	Risk	Comment
Place Scrutiny Committee consider and comment, as appropriate, on the updated RLDP Preferred Strategy.	This provides the Place Scrutiny Committee with the opportunity to scrutinise the updated Preferred Strategy and comment accordingly. Any feedback received will be noted and reported to Council on 26 th October 2023.		This is the preferred option. The updated Preferred Strategy, 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. It responds to consultation responses.
Place Scrutiny Committee does not comment on the updated RLDP Preferred Strategy.		The option of not commenting on the Preferred Strategy would result in the Place Scrutiny Committee missing a key opportunity to shape the Deposit RLDP.	

6. RESOURCE IMPLICATIONS

- 6.1 Officer and consultant time and costs associated with the preparation of the revised Preferred Strategy will be met from the Planning Policy budget and existing LDP reserve.
- 6.2 Delivery of the RLDP, once adopted, will need to be accompanied by a range of infrastructure provision including transport, education, health care, leisure and affordable housing. The infrastructure requirements will be identified in the Infrastructure Plan and updated Local Transport Plan accompanying the RLDP. Although it is expected that most of this infrastructure would be funded via S106 planning contributions (or possibly a Community Infrastructure Levy), there may be a requirement for Council expenditure to assist in providing some infrastructure or in bringing some sites forwards. This might include the use of Compulsory Purchase Orders (CPO) and/or potential commercial investment to provide 'shovel ready' sites or business premises. There may also be grant funding available. The Council's commitment for 50% affordable housing provision on new site allocations may require Welsh Government policy position changes on use of Social Housing Grant or other public sector funding. This commitment could have financial implications for the Council of reduced land sale receipts and the potential need to CPO sites to bring them forward. This approach is supported by Future Wales 2040 Policy 3 which supports public leadership and the use of public land to deliver on ambitious affordable housing targets.

7. CONSULTEES

- Cabinet Member for Sustainable Economy, Deputy Leader
- SLT
- Communities and Place DMT
- Community consultation and engagement from Monday 5th December 2022 and Monday 30th January 2023
- Member workshop 12th July 2023

8. BACKGROUND PAPERS

- RLDP Preferred Strategy (December 2022)
- Integrated Sustainability Appraisal Report (AECOM, December 2022)
- HRA of the Monmouthshire RLDP Preferred Strategy (AECOM, December 2022)
- RLDP Delivery Agreement (December 2022)
- Monmouthshire RLDP Demographic Update Report (Edge Analytics, November 2021)
- Sustainable Settlements Appraisal (December 2022)
- Growth and Spatial Options Paper (September 2022)
- Housing Background Paper (December 2022)
- Employment Land Review (BE Group, October 2022)
- Issues, Vision and Objectives Paper (Updated December 2022)
- Monmouthshire 2040: Our Economic Growth and Ambition Statement (November 2019) and supporting MCC Economies of the Future Reports (2018)
- Candidate Sites Register (February 2022)
- Candidate Sites High Level Assessment (August 2022)
- Local Housing Market Assessment 2020-2025
- LDP Annual Monitoring Reports (2014-2021)

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APPENDICES:

APPENDIX 1: Welsh Government Planning Division's response to revised Preferred Strategy 26th January 2023

APPENDIX 2: RLDP Preferred Strategy with post-consultation updates highlighted

APPENDIX 3: Summary of consultation responses relating to the Preferred Strategy

APPENDIX 4: Summary of consultation responses relating to the Candidate Sites register

APPENDIX 5: Equality and Future Generations Evaluation

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Mark Hand
Head of Planning, Housing and Place Shaping
Monmouthshire County Council
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NP15 1GA

26 January 2023

Dear Mark

**Monmouthshire County Council – Replacement Local Development Plan (LDP)
Preferred Strategy Consultation: Welsh Government Response**

Thank you for consulting the Welsh Government on the Monmouthshire County Council Replacement Local Development Plan (LDP) – Preferred Strategy consultation. It is essential the authority is covered by an up-to-date LDP to give certainty to local communities and businesses.

Without prejudice to the Minister's powers, the Welsh Government is committed to helping Local Planning Authorities (LPAs) minimise the risk of submitting unsound plans by making comments at the earliest stages of plan preparation. The Welsh Government looks for clear evidence that the plan is in general conformity with Future Wales: The National Development Framework and that the tests of soundness (as set out in the 'LDP Manual') are addressed.

The development planning system in Wales is evidence led and demonstrating how a plan is shaped by the evidence is a key requirement of the LDP examination. It is essential that a plan is in general conformity with Future Wales, responds to national planning policy and the place making agenda, addresses climate change and nature emergencies, and demonstrates strategy delivery.

After considering the key issues and policies in Future Wales, the Preferred Strategy, as presented in relation to the scale of growth, appears to be more appropriate fit with Future Wales: The National Development Framework than the previous draft. In the absence of a Strategic Development Plan more work will be required to evidence how the Monmouthshire Local Development Plan relates to sub regional development and impacts on neighbouring authorities. Specific comments are set out in the **Statement of General Conformity** (Annex 1 to this letter) with additional guidance contained in the Development Plans Manual (3rd Edition, March 2020) – 'the DPM'.

The Preferred Strategy has been considered in accordance with the tests of soundness as set out in the DPM (Table 27, page 166). **Our representations are provided by topic area, with further detail in the attached Annex 2.**

National planning policies are set out in Planning Policy Wales (PPW) Edition 11, which seeks to deliver high quality, sustainable places through a place-making approach. The implementation of the core policy areas in PPW, such as adopting a sustainable spatial strategy, appropriate housing and economic growth levels, infrastructure delivery and place-making, are articulated in more detail in the LDP Manual (Edition 3). We expect the core elements of the Manual, in particular Chapter 5 and the 'De-risking Checklist', to be followed.

It is disappointing that key background documents on issues including an up-to-date Local Housing Market Assessment, (LHMA), Strategic Site delivery and a high-level/site-specific viability appraisal have not been completed to 'front load' the process and inform findings in the Preferred Strategy. A robust evidence base is critical to fully understand the plan.

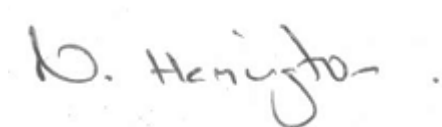
Our representation includes more detailed issues set out in Annex 1 and Annex 2 to this letter. Collectively, our comments highlight a range of issues that need to be addressed for the plan to be considered 'sound'. The key areas include:

- Economic growth levels
- Relationship to adjoining local authorities
- Ensuring the delivery of 50% affordable housing allocations
- Site delivery/implementation, including financial viability
- Phosphates and nutrient neutrality
- Gypsy and Traveller Accommodation

I would urge you to seek your own legal advice to ensure you have met all the procedural requirements, including the Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment (HRA), as responsibility for these matters rests with your authority. A requirement to undertake a Health Impact Assessment (HIA) arising from the Public Health (Wales) Act 2017, if appropriate, should be carried out to assess the likely effect of the proposed development plan on health, mental well-being and inequality.

My colleagues and I look forward to meeting you and the team to discuss matters arising from this response.

Yours sincerely



Neil Hemington
Chief Planner Welsh Government

For matters relating to general conformity with Future Wales and planning policy please contact: PlanningPolicy@gov.wales

For matters relating to Local Development Plan procedures please contact: Planning.Directorates@gov.wales

Statement of General Conformity

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.

Reasons

The Welsh Government acknowledges the work the local authority has undertaken in developing the Preferred Strategy, which includes consideration of the local need for affordable housing and a number of growth and spatial options.

As the local authority acknowledge, Monmouthshire forms part of the South East Wales Region which includes a National Growth Area that focusses new development in Cardiff, Newport and the Valleys. Monmouthshire is not within the National Growth Area, as defined by Policy 1 and Policy 33 of Future Wales. **The level of economic and housing growth proposed by the Preferred Strategy supports the local need for additional economic and affordable housing growth.**

Monmouthshire is predominantly a rural area with widely distributed market towns and villages. The south of the county has strong functional linkages to Newport, Cardiff and Bristol. The county is characterised by very significant environmental assets including the Wye Valley Area of Outstanding Natural Beauty (AONB), the setting of the Brecon Beacons National Park, the Gwent levels, Special Areas of Conservation (SACs), numerous Sites of Special Scientific Interest (SSSI) and many historic buildings and landscapes. The County also possesses some of the most significant tracts of Best and Most Versatile Agricultural land in Wales.

The level of housing proposed for the plan period (5,400 dwellings) is 2,790 units above the Welsh Government 2018-based principal household projection for Monmouthshire County Council minus the Brecon Beacons National Park Authority (BBNPA) area is 2,610 units. The proposed level of housing growth (360 dpa) is above the past 5 and 10-year build rates (310 and 285 dpa respectively). In terms of ensuring that the LDP delivers the identified requirement of 5,400 dwellings the Council has identified a flexibility allowance of 10%, a provision of 5,940 dwellings.

The level of growth proposed in the Preferred Strategy is justified by the need to significantly increase the supply of affordable housing whilst not diverting growth away from the national growth area or have adverse effects on phosphate pollution. The strategy of concentrating new growth primarily in Caldicot and the Severnside area (44%) should reduce the potential to negatively impact on environmental assets and avoid adverse consequences for climate and nature emergencies.

With regard to the level of housing identified whilst it is above the 2018 based projections and past build rates over the last 5 and 10 years, a higher level of housing is only justified by the severe need to deliver affordable housing particularly for younger people. The Council is seeking 50% of new allocations to be affordable housing (1,100 units) which will achieve the key objective of the plan. This will ensure that Monmouthshire continues to grow in a sustainable manner based on a locally appropriate level of development which is compatible with Policies 1, 7 and 33 of Future Wales.

Future Wales identifies a Green Belt to the north of Cardiff, Newport and the eastern part of the region and is clear that LDPs should not permit major development in areas shown for consideration as Green Belts, except in very exceptional circumstances. This is until the need for Green Belts and

their boundaries has been established by an adopted Strategic Development Plan. Although the areas identified for growth in the Preferred Strategy fall outside of the indicative Green Belt boundary and national planning policy allows for extensions to existing settlements within and adjoining the Green Belt of an appropriate scale, there should be no ambiguity about the need to protect land elsewhere.

Finally, whilst not an issue of general conformity but one relating to the tests of soundness is that by the deposit stage the Council should be in a position to demonstrate they have collaborated with neighbouring authorities to show alignment between growth levels, both homes and jobs.

Policy S9 (the policy should address reducing parking levels) 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).

Annex 2 to Welsh Government Letter dated 27 January 2023 in response to Monmouthshire County Council's Replacement LDP – Preferred Strategy

Phosphates

Following NRW's publication of updated guidance relating to phosphates and nutrient neutrality in January 2021, the ability of LDPs to demonstrate they can align with the revised approach is paramount for plans to be able to be considered 'sound'. This primarily applies to the scale and location of new development, the ability of the existing infrastructure to remove phosphates to accommodate growth, the levels of phosphates within the riverine system and how nutrient neutrality can be achieved. Avoiding adverse effects regarding phosphates and the riverine environment may have an influence on the plan's strategy, to which this plan has responded positively. **The Deposit Plan and associated HRA must demonstrate nutrient neutrality or betterment in order to be considered sound.**

Growth Levels: Homes and Jobs

The Council's Preferred Strategy is based on Growth Option 2, a demographic-led projection, resulting in a requirement of 5,400 dwellings (360 dpa) over the plan period 2018-2033. The strategy places great emphasis on the need for a step change in the supply of affordable housing with all new housing sites being affordable housing led (at least 50% affordable). For reasons of consistency the Deposit plan should refer to the strategy as an affordable housing delivery led strategy.

Strategic Policy S1: Preferred Growth Strategy, makes provision for 5,940 dwellings to deliver a requirement of 5,400 units with a 10% flexibility allowance. The Council will need to explain why 10% is appropriate in line with requirements in the DPM as a lower/higher flexibility allowance may be suitable. Too low a flexibility allowance could raise potential pressure to release more land later, whilst too high could result in excessive growth threatening the national growth area relationship.

The Council has removed previous allocations which have either stalled or are not supported by sufficient evidence to demonstrate delivery. It is not appropriate to automatically consider they should be rolled forward. This is considered a prudent approach supported by advice in the DPM.

The proposed level of housing is above the WG 2018 principal projection, requiring an annual completion rate higher than both the previous 5 and 10 year averages. Monmouthshire is also outside the South East Wales National Growth Area, as set out in the Future Wales. However, the Council does have an acute need for affordable housing, approximately 7,000 affordable units over the plan period. Acknowledging a land bank of 3,740 units, combined with all proposed new allocations to be 50% affordable housing, with a refocus of the majority of new development in the Severnside area, **the Preferred Strategy is considered to be in general conformity with Future Wales. However, 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.**

Spatial Distribution of Housing

Monmouthshire's preferred spatial strategy, Option 2: 'Distribute Growth Proportionately across the County's most Sustainable Settlements' states the level of growth proposed in each settlement will be proportionate to its size, amenities, affordable housing need and capacity for growth. The settlement hierarchy listed in Strategic Policy S2 is underpinned by findings in the Council's Sustainable Settlements Appraisal (June 2021). The appraisal confirms the dominant role of the Tier 1 County towns of Abergavenny, Chepstow and Monmouth that account for 41% of all housing development. It should be noted this proportion has reduced since the previous preferred strategy. Due to high phosphate levels in the Wye and Usk Welsh Water has made a commitment to improve

the Waste Water Treatment facilities in Monmouth and Llanfoist. Improvements to both works are currently subject to design and regulatory approval. On the basis that improvement to both works to remove phosphates are planned it is appropriate to identify new affordable housing led allocations in both Monmouth and Abergavenny in the Deposit plan.

The appraisal identifies the other Tier 1 settlement of Caldicot within the Severnside cluster, which has strong geographical and functional linkages to other Tier 2, 3 and 4 settlements along the M4 corridor. There is also a strong functional linkage with Newport, Cardiff and Bristol. Together the area accounts for 44% of the plan's housing growth.

It is noted there is a large urban extension to the east of Caldicot for approximately 1,200 units. Whilst this will not have an adverse effect on phosphates, potential implications for not increasing proportionately private car trips, or best and most versatile land will need to be demonstrated by deposit stage.

Welsh Government does not object to the Preferred Strategy's settlement hierarchy and distribution of housing growth with 85% of all new housing development proposed in the Tier 1 settlements and the Severnside cluster.

The Deposit Plan should:

- Specifically identify the number of new homes proposed in Tier 3 Main Rural Settlements and Tier 4 Minor Rural Villages separately.

Affordable Housing

The Local Housing Market Assessment 2020-2025 (LHMA) identifies a need for 468 affordable units per annum (or 7,020 units over the plan period), of which 68% is for social rent and 32% intermediate need. The greatest demand is for 1 bed properties across Monmouthshire with the level of housing need greatest in the sub-market area of Chepstow and Caldicot (at 46%). It is a significant concern that the Council has not yet revised its LHMA using the new approved methodology. This must do so before the plan is placed on deposit.

To address housing affordability, the Council aims to deliver 1,100 units through 50% affordable housing on the new affordable housing-led allocations. **The Welsh Government strongly supports affordable housing-led sites. Delivery 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. For this reason, evidence should include a resolution to use public land for this purpose, a binding legal agreement where the land is in private ownership or a resolution of the council to use compulsory purchase powers. The Welsh Government notes the Council has brought forward public land to deliver this scale of growth which should enable a more robust delivery mechanism to achieve this aim, supported by a robust policy framework.

Strategic Policy S6 identifies the plans affordable housing target totalling 1,850 units based on viability percentages in the adopted LDP for market led sites, with new allocations on affordable housing led sites (2,200 units) achieving rates of 50%. There is **no viability evidence to accompany the revised plan on either a high level or site specific viability appraisals**. This needs to be rectified by Deposit stage. The Welsh Government also has the following observations:

- The Deposit Plan should meet the requirements as set out in the DPM 'Affordable Housing Policy Framework – Checklist'.

Employment Provision and Job Growth

Strategic Policy S12 makes provision for a minimum of 38ha of employment land. This is supported by the Council's Employment Land Review (ELR, 2022) advising that employment forecasts are

based on past take-up rates (1.85ha per annum) plus a 5-year buffer (9.5ha), equating to a requirement of 37.9ha over the plan period (2018-2033).

The scale of job growth being sought by the Council (+416 jobs per annum) is described as radical structural change in the Council's Demographic Report (Edge Analytics, 2021) and is based, amongst other things, on reducing the commuting ratio from the 2011 Census value (1.12) to the 2001 Census value (1.10) by 2033. The 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. The robustness of the economic projections should be revisited for the Deposit plan to test their credibility against recent economic events including, the September 2022 mini Budget, ensuing interest rate increases and resultant lower UK growth forecasts. The Deposit plan should **also demonstrate the changes required to Monmouthshire's economy and how this will be achieved in a way that is compatible with other authorities in the region.**

The Council's strategy is not to reflect past trends but increase job opportunities. On the basis of the evidence the levels of job growth are optimistic. This could result in housing delivery not being matched to new job opportunities, leading to further out commuting. **It will be essential to demonstrate how the increase in jobs can be achieved in a way which is compatible with the South East Wales National Growth Area.** This is particularly relevant when Newport is considered to have high levels of B1 office provision/expansion to meet the majority of need in the region.

The following should also be addressed by Deposit stage:

- Not all of the 6,240 new jobs will be in the B-Class sector. The Council will need to demonstrate greater certainty on delivering the scale of job growth as an under delivery of jobs will not deliver on the key issues the plan is seeking to address.
- The Council needs to explain how growth in surrounding Councils, as expressed in the 'Larger than Local Study', such as Newport and high employment take-up rates in Caerphilly, will impact on employment growth in Monmouthshire.
- For the development of large sites to occur, such as Quay Point (13.76ha) significant infrastructure investment is required to make them available for development in the medium to long term. The council needs to demonstrate how/when this will be achieved.

Gypsy and Traveller Provision

The Council submitted a draft assessment for approval to Welsh Government's Communities Division early 2021). The draft assessment identifies a need for 13 pitches over the plan period (2018-2033) with 9 residential pitches 2020-2025 and a further 4 pitches 2026-2033.

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'. We would therefore encourage your authority to work with our Communities Division to ensure an agreed GTAA is in place by Plan Deposit.

Minerals

The second review of the Regional Technical Statement (RTS2) has been endorsed by Monmouthshire County Council and identifies that no allocations are required in the plan period for crushed rock or sand and gravel. 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, which also includes the authorities of Newport, Torfaen and Blaenau Gwent. A SSRC is pertinent for the region as the

RTS2 identifies a shortfall of crushed rock, particularly in Newport and Torfaen, with extensive unworked reserves in Monmouthshire.

Other Matters to address at Deposit Stage

- Ensure all development is compliant with TAN15 and flood risk issues. This should be done in compliance with the revised TAN15, anticipated to be published later in 2023.
- Set out a robust housing trajectory, clearly identifying the phasing and timing of sites, linked to any infrastructure required to deliver the housing requirement. Tables 16, 17, 19, 20, 21 and Diagram 16 in the DPM should be completed.
- The selected strategic growth options should be progressed further, with greater clarity, including schematic diagrams and the key issues which need to be addressed for each site to come forward.
- Prepare an Infrastructure Plan to demonstrate how relevant infrastructure to support development will come forward (DPM, paragraphs 5.125 – 5.128).
- For some strategic development sites, there is potential for cumulative trunk road capacity impacts, especially at Abergavenny, Caldicot and Chepstow. All strategic development sites should be supported by Transport Assessments that are underpinned by the Welsh Transport Strategy and have regard to Active Travel and air quality, especially in existing Air Quality Management Areas (AQMAs).
- Undertake further work on the contribution renewable energy can make to assist with climate change and decarbonisation.

Monmouthshire Replacement Local Development Plan

Preferred Strategy

~~December 2022~~

September 2023 Update



monmouthshire
sir fynwy



**Monmouthshire County Council
Replacement Local Development Plan**

Preferred Strategy

~~December 2022~~

September 2023 Update

Planning Policy Service

Monmouthshire County Council

County Hall, Rhadyr, Usk, Monmouthshire NP15 1GA

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Structure of the Preferred Strategy

This Document is structured as follows:

Executive Summary

Section 1: Introduction – Provides a summary of the RLDP process and progress to date, outlines what the Preferred Strategy is, how it is prepared and the next key steps in the RLDP process.

Section 2: Context – Presents an overview/profile of the County outlining the key economic, social, environmental and cultural characteristics of Monmouthshire.

Section 3: Key Issues, Challenges and Opportunities – Provides a summary of the key issues, challenges and opportunities within Monmouthshire.

Section 4: RLDP Strategic Framework – Outlines the RLDP Vision and Objectives, sets out the Preferred Growth and Spatial Option (i.e. the Preferred Strategy), and the key diagram.

Section 5: Implementation and Delivery – Sets out the Strategic Policies and identifies the Preferred Strategic Site Allocations for our Primary Settlements.

Appendices – provide further detail in relation to RLDP key stages; supporting evidence to the Preferred Strategy; legislative and policy context and key influences on the Plan; the RLDP Issues; Preferred Strategic Site Allocations; and a review of the Development Management policies contained within the adopted LDP.

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Replacement Local Development Plan Preferred Strategy – Executive Summary

Introduction

- i. Monmouthshire County Council (MCC) is preparing a Replacement Local Development Plan (RLDP) for the County (excluding the area within the Brecon Beacons National Park), covering the period 2018-2033. When adopted, it will be the statutory land use plan to support 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 life¹. The RLDP will set out land use development proposals for the County and will identify how much new development will take place to 2033 and where this will be located. It will also identify areas to be protected from development and provide policies against which future planning applications will be assessed.
- ii. The RLDP will deliver the Council’s objectives and address the core issues of delivering essential affordable homes at pace and scale, responding to the climate and nature emergency by delivering net zero carbon ready 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.
- iii. From 5th December 2022 to 30th January 2023, we’re seeking your views on the proposed Preferred Strategy. Details of [how to get involved](#) can be found on our website.

What is the Preferred Strategy?

- iv. The Preferred Strategy provides the strategic direction for the development and use of land over the Plan period 2018 to 2033.
 - Section 2 sets out a profile of the County;
 - Section 3 identifies key issues, challenges and opportunities for the County;
 - Section 4 develops a vision and objectives for the RLDP that respond to the key issues, challenges and opportunities, and sets out the scale of future growth in population, housing and jobs (Strategic Policy S1) and the spatial distribution of growth (Strategic Policy S2); and
 - Section 5 sets out the preferred strategic sites and strategic policies to deliver the strategy (Strategic Policies S3 Sustainable Placemaking & High Quality Design, S4 Climate Change, S5 Infrastructure Provision, S6 Affordable Homes, S7 Preferred Strategic Site Allocations, S8 Gypsy and Travellers, S9 Sustainable Transport, S10 Town, Local and Neighbourhood Centres, S11 Community & Recreation Facilities, S12 Employment Sites Provision, S13 Rural Enterprise, S14 Visitor Economy, S15 Sustainable Waste Management, S16 Minerals, and S17 Green Infrastructure, Landscape and Nature Conservation).

¹ The draft Community and Corporate Plan 2022 sets out the Council’s core purpose, principles, and priorities. It was endorsed by [Cabinet on 19th October 2022](#) and a developed version will be reported to Council in January 2023 [adopted by Council on 20th April 2023](#).

- v. The diagram below illustrates the Plan making process.

Replacement Local Development Plan Process



Supporting Documents

- vi. The Preferred Strategy 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 emerging proposals and policies will help to achieve the wider environmental, economic, social and cultural objectives of the RLDP. The Preferred Strategy has also been subject to a Habitats Regulations Assessment.
- vii. The RLDP will also be accompanied by an Infrastructure Plan, an updated Local Transport Plan and an Economic Development Strategy.

Preferred Strategy

- viii. The Preferred Strategy:
- Makes provision for approximately 5,400 - 5,940 6,210 homes over the Plan period 2018-2033² (Strategic Policy S1). This includes approximately 1,580 - 1,850 1,910 affordable homes (Strategic Policy S6). As there are currently approximately 3,740 4,085 homes in the housing landbank³, land will be allocated for approximately 1,660 - 2,200 - 2,125 new homes, including 830 - 1,100 1,065 new affordable homes.**
 - Sets out the planning policy framework to enable the provision of approximately 6,240 additional jobs by allocating sufficient employment land and by including policies to facilitate economic growth (Strategic Policy S12). The RLDP will be supported by an Economic Development Strategy.**
 - Focuses growth in the County's most sustainable settlements of Abergavenny, Chepstow, Monmouth and Caldicot (including Severnside) (Strategic Policy S2). Preferred strategic sites are identified to expand the Primary Settlements of Abergavenny, Caldicot, Chepstow and Monmouth**

² In accordance with the Development Plans Manual (WG, March 2020) an allowance is provisionally made for a 10-15% 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. The flexibility allowance will be given further consideration and refined at Deposit stage.

³As 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 account of LDP rollover sites, windfall sites & small sites.

(Strategic Policy S7). Other detailed site allocations will be set out in the Deposit RLDP. ~~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, no new site allocations are proposed in the primary settlement of Monmouth or within the upper River Wye catchment area north of Bigsweir Bridge.~~

~~Identifies Preferred Strategic Site Allocations in the primary settlements of Abergavenny, Chepstow and Caldicot, including Severnside. Other detailed site allocations will be set out in the Deposit RLDP.~~

- d. Limits the impact of climate change by ensuring **new homes are net zero carbon ready and well connected with existing settlements**, providing attractive and accessible places to live and work.
 - e. **Sets out strategic policies** on a range of topic areas, reflecting the four placemaking themes in Planning Policy Wales (PPW edition 11, 2021).
- ix. ~~Without an identified strategic solution to the water quality environmental constraint in the upper River Wye catchment, the Preferred Strategy cannot deliver the Council's objectives, including the delivery of new affordable homes, in that part of the County. Should that situation change during the Plan period, windfall sites within settlement boundaries could be developed. It is proposed to include within the settlement boundary to Monmouth three sites that are currently unable to progress due to water quality: the current LDP allocations at Drewen Farm, off Wonastow Road (c.110 homes) and at Tudor Road, Wyesham (c.35 homes); and land with planning permission at Rockfield Road (c.130 homes). These sites do not count towards the housing figures.~~
- x. The table below sets out the indicative distribution of the proposed housing growth. There are different components that contribute towards the ~~5,940~~ **6,210** homes (5,400 plus ~~10~~ **15%** flexibility) including homes already built since 2018 (~~1,579~~ **1,922** homes), sites with planning permission that will realistically be built (~~1,263~~ **993** homes), LDP 'rollover' allocations (160), small sites and windfalls (~~900~~ **1,010** homes), and new site allocations (~~2,200~~ **2,125** homes).

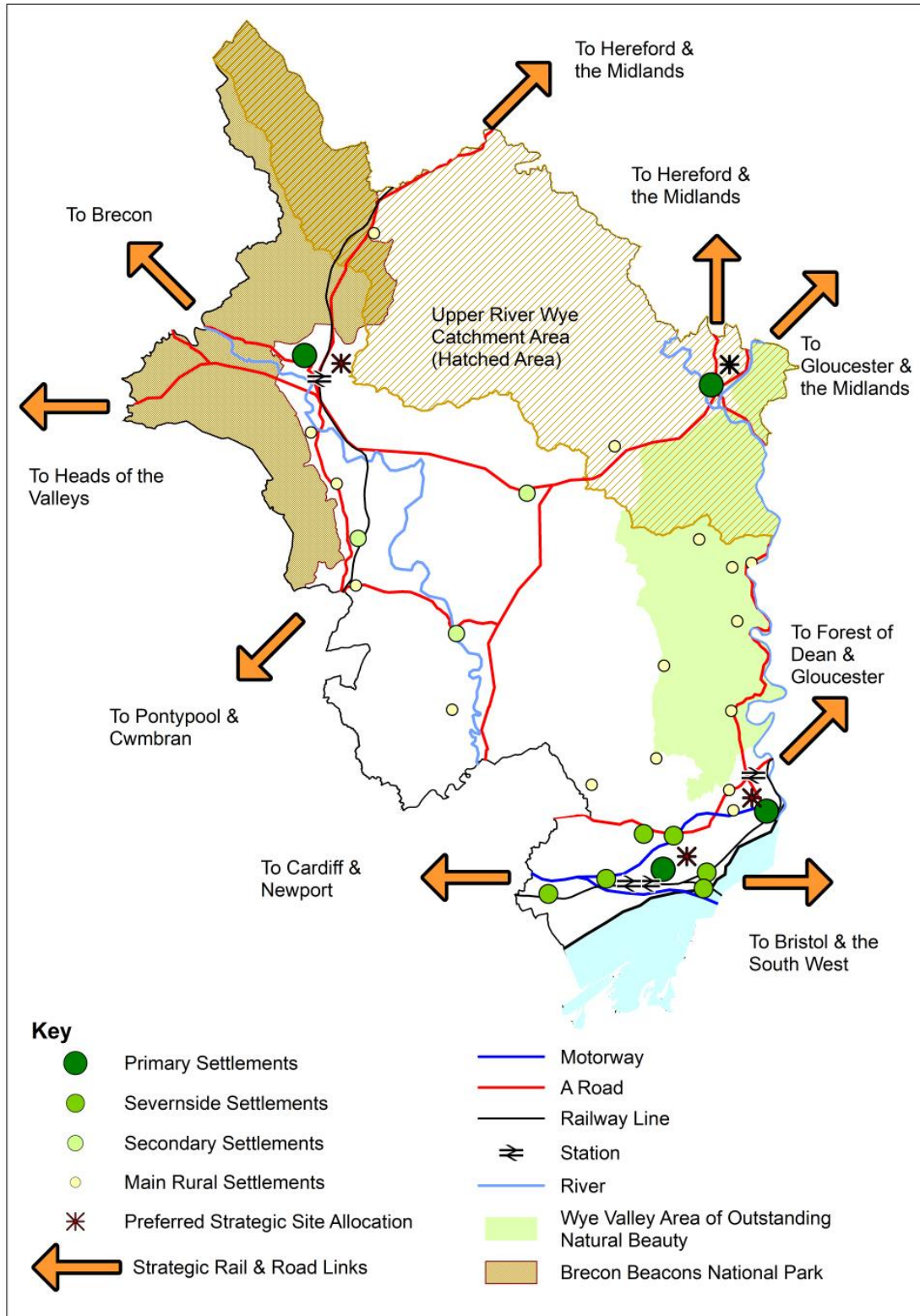
Summary of Indicative Spatial Distribution of Housing Provision*

Settlement	Total Commitments			Preferred Strategy		Total Housing Provision 2018-2033*
	Completions 2018-2021 2023	Existing Commitments	LDP Rollover Allocations	Total Allowances (Small Sites; Windfalls)	RLDP New Housing Allocations (Dwellings)	
Abergavenny (incl. Llanfoist)	426 486	132 77	0	245 240	600	1,403
Chepstow	192 315	267 170	0	165 165	145	769 795
Monmouth (incl. Wyesham)	264 267	11 81	145	0 86	0 330	275 909
Caldicot (incl. Severnside)	466 591	723 587	0	220 192	1,200 825	2609 2195
Secondary Settlements	100 104	45 38	0	80 79	155 120	380 341
Rural Settlements	131 159	83 40	0 15	190 248	100 105	504 567
Total	1,579 1,922	1,261 993	160	900 1,010	2,200 2,125	5,940 6,210

*Figures include an indicative 10% 15% flexibility allowance which will be subject to further consideration and refinement at Deposit Plan stage. The spatial distribution may alter following detailed site assessment work

xi. The Preferred Strategy is illustrated in the Key Diagram below.

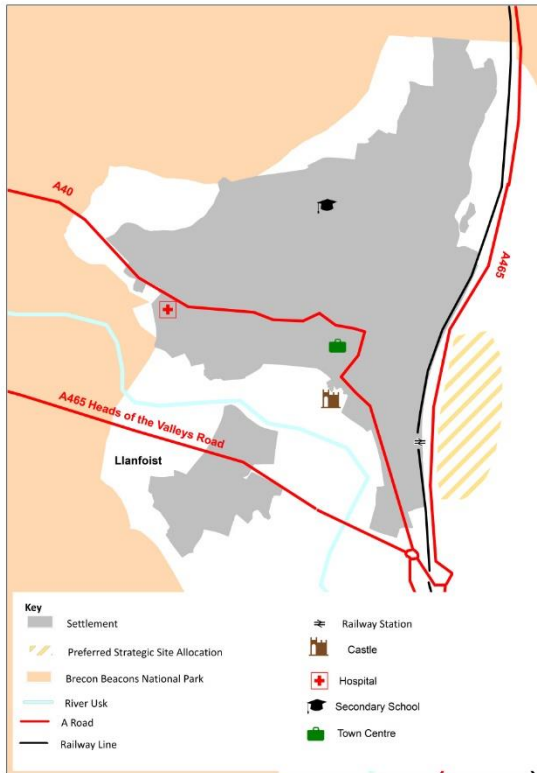
Key diagram of the Preferred Strategy



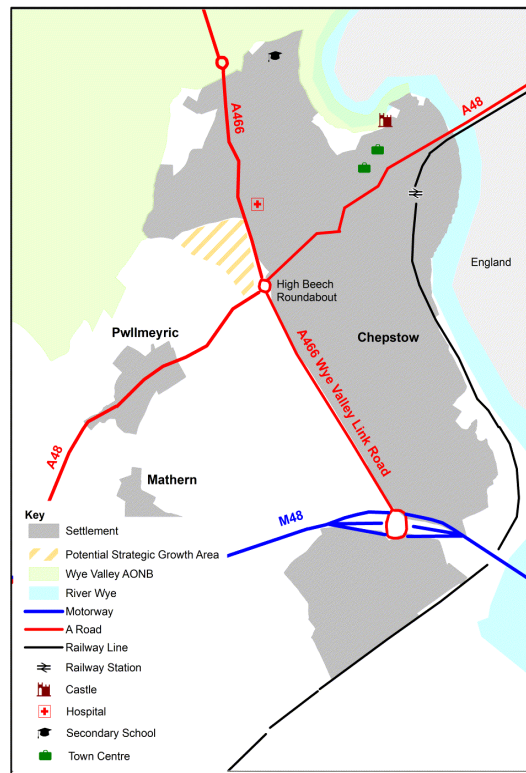
- xii. The Preferred Strategy identifies **three** **four** Preferred Strategic Site Allocations, details of which are provided below.

Location of the Preferred Strategic Site Allocations

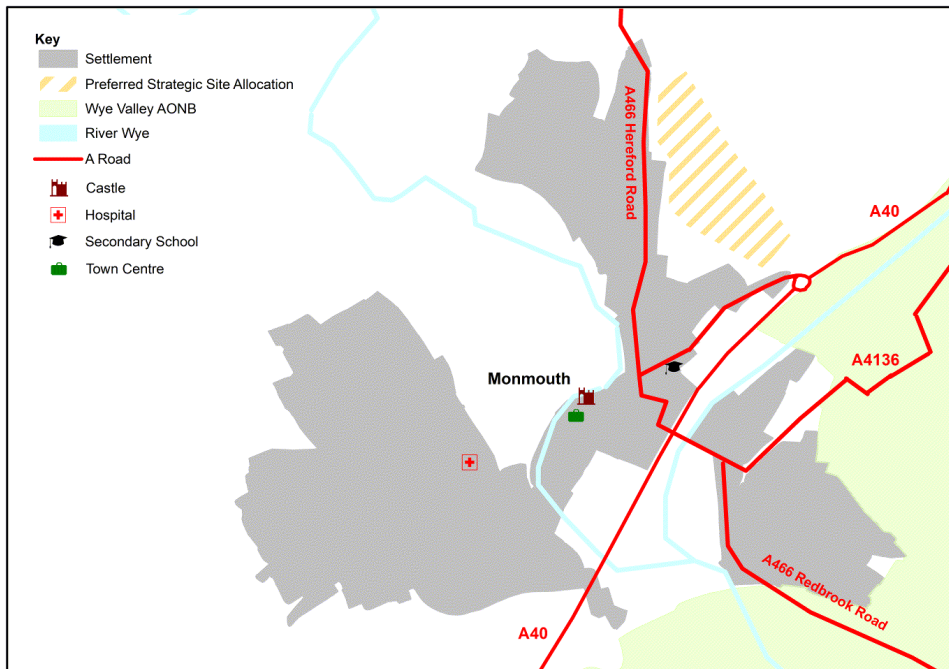
Abergavenny East



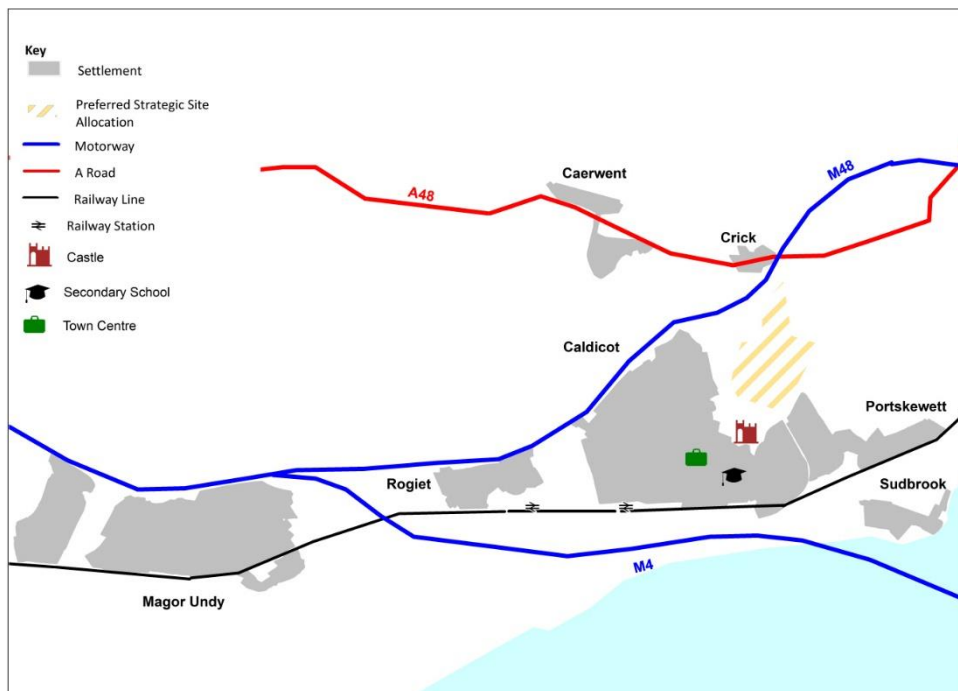
Mounon Road, Chepstow



Leasbrook, Monmouth



Caldicot East



Details of the Preferred Strategic Site Allocations

Site Name	Candidate Site Reference	Size (Ha)	Proposed Use	Approximate No. of homes within Plan period
Abergavenny East	CS0213	24.75	Mixed Use: Residential, Employment, Retail, Leisure, Education and Community Use	500
Bayfield, Chepstow	CS0098	10.07	Residential	145
Mounton Road, Chepstow	CS0165	12.8	Residential	145
Leasbrook (land north of Dixton), Monmouth	CS0270	12.5	Residential	270
Caldicot East	CS0087 CS0251	67.67 94.57	Mixed Use: Residential, Employment, Retail, Leisure	925 735*

*MoD proposals for Caerwent Barracks will add 100 homes to Caldicot East to provide service family accommodation. These homes would be built or purchased by the MoD and would not be available to the general public, so would not count towards our housing total.

- xiii. The Preferred Strategy also requires the allocation of 38ha of employment land comprising:
- a. B1: 3.5ha
 - b. B2: 9.2ha
 - c. B8: 25.2ha

Next Steps

- xiv. Following the consultation and stakeholder involvement on the Preferred Strategy, the Council will finalise the RLDP and place it on Deposit. Feedback from the Preferred Strategy consultation will be detailed in the Consultation Report on the Strategy. This report must accompany the RLDP ISA Report and the other supporting documents on Deposit, in accordance with Regulation 17 of the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 (as amended 2015). A summary of key issues raised through the consultation and the Preferred Strategy with any necessary amendments will be reported to Council in Spring 2023 to seek approval of the Preferred Strategy. The Deposit Plan will then be prepared and considered by Council prior to statutory consultation and engagement during Spring 2024.

- xv. Following consultation on the Deposit Plan and consideration of the issues raised, it will be submitted to the Welsh Government who will appoint an independent Inspector to examine the RLDP. Having regard to the evidence and representations received during the Deposit consultation, the Inspector must determine whether the RLDP accords with the 'tests of soundness' set out in the Development Plans Manual.
- xvi. Following the examination, the Inspector will issue a report recommending any necessary changes to the RLDP. The Inspector's report will be binding and the Council must accept the changes and adopt the RLDP as amended. Once adopted, the RLDP will replace the existing Adopted LDP.

1 Introduction

Replacement Local Development Plan

- 1.1 Monmouthshire County Council (MCC) is preparing a Replacement Local Development Plan (RLDP) for the County (excluding the area within the Brecon Beacons National Park), covering the period 2018-2033. When adopted, it will be the statutory land use plan to support 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 life⁴. The RLDP will set out land use development proposals for the County and will identify how much new development will take place and where this will be located 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.
- 1.2 The RLDP will deliver the Council’s objectives and address the core issues of delivering essential affordable homes at pace and scale, responding to the climate and nature emergency by delivering net zero carbon ~~ready~~ 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.
- 1.3 The RLDP is being prepared in accordance with the Revised Delivery Agreement (December 2022) which sets out the timetable for Plan preparation and the approach to community consultation and engagement. The Preferred Strategy is the first of the statutory consultation stages in the RLDP process. Figure 1 below provides a broad overview of the RLDP process.

Figure 1: Replacement Local Development Plan Process



⁴ The draft Community and Corporate Plan 2022 sets out the Council’s core purpose, principles, and priorities. It was endorsed by Cabinet on 19th October 2022 and a developed version will be reported to Council in January 2023 adopted by Council on 20th April 2023.

1.4 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 1. 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 ~~new December 2022~~ Preferred Strategy has been prepared having regard to the challenges experienced whilst also ensuring the RLDP delivers on its Vision and Objectives.

What is the Preferred Strategy?

1.5 The overall purpose of the Preferred Strategy is to provide the strategic direction for the development and use of land in Monmouthshire (excluding the area within the Brecon Beacons National Park) over the Plan period 2018 to 2033. The Preferred Strategy:

- Identifies key issues, challenges and opportunities for the County;
- Sets out a vision and objectives for the RLDP that respond to the key issues, challenges and opportunities;
- Sets out the scale of future growth in population, housing and jobs and establishes the spatial distribution of growth; and
- Sets out the preferred strategic site allocations and strategic policies to deliver/implement the strategy.

1.6 Regulation 15 of the Local Development Plan Regulations⁵ requires the Council to publish its pre-Deposit Plan proposals (Preferred Strategy) for public consultation prior to determining the content of its Deposit Plan. The Preferred Strategy is the first statutory consultation stage in the RLDP preparation process. It is informed by, and represents the completion of, a period of pre-Deposit Plan preparation and engagement (as referred to above).

1.7 The Preferred Strategy provides the strategic framework for the future preparation of more detailed policies, proposals and land use allocations that will be included in the Deposit RLDP. The Plan will seek to deliver on the Council's core purpose of becoming a zero-carbon county, supporting well-being, health and dignity for everyone at every stage of life.

1.8 As evidenced in the Annual Monitoring Reports for the Adopted LDP, it is recognised that many of the Adopted LDP's policies are functioning effectively and will require only minor changes to reflect contextual changes and updates to national policy.

⁵ The Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 (as amended 2015)

Supporting Documents

- 1.9 The Preferred Strategy 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 emerging proposals and policies will help to achieve the wider environmental, economic, social and cultural objectives of the RLDP. The Preferred Strategy has also been subject to a Habitats Regulations Assessment. The [Initial Integrated Sustainability Appraisal Report](#) and [Habitats Regulations Assessment of the Preferred Strategy](#) are published alongside the Preferred Strategy. The Integrated Sustainability Appraisal and Habitats Regulations Assessment are iterative processes and will be updated as the RLDP progresses towards adoption
- 1.10 The RLDP will also be accompanied by an Infrastructure Plan, setting out what is needed to support the development of the allocated sites, and will sit alongside an updated Local Transport Plan and an Economic Development Strategy. Together, these Plans will 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.
- 1.11 The Preferred Strategy is informed by a number of additional supporting background documents as listed in Appendix 2. These background documents should be read alongside the Preferred Strategy: only the main findings of the background documents are highlighted in this Preferred Strategy given the significant amount of data/information they contain.
- 1.12 A Second Call for Candidate Sites took place over a twelve-week period between 5th July to 31st August 2021. The Preferred Strategy is accompanied by a background paper that identifies those candidate sites that broadly accord with the Strategy. A detailed assessment of candidate sites will be published alongside the Deposit RLDP

Community & Stakeholder Engagement and Consultation on the Preferred Strategy

- 1.13 The Preferred Strategy will be the subject of community and stakeholder engagement and consultation. Full details of all the consultation events and methods on how to comment on the Preferred Strategy are available to view on the Council's website.

Next Steps

- 1.14 Following the consultation and stakeholder involvement on the Preferred Strategy, the Council will finalise the RLDP and place it on Deposit. Feedback from the Preferred Strategy consultation will be detailed in the Consultation Report on the Strategy. This report must accompany the RLDP ISA Report and the other supporting documents on Deposit, in accordance with Regulation 17 of the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 (as amended 2015). A summary of key

issues raised through the consultation and the Preferred Strategy with any necessary amendments will be reported to Council in Spring 2023 to seek approval of the Preferred Strategy. The Deposit Plan will then be prepared and considered by Council prior to statutory consultation and engagement during Spring 2024.

- 1.15 Following consultation on the Deposit Plan and consideration of the issues raised, it will be submitted to the Welsh Government who will appoint an independent Inspector to examine the RLDP. Having regard to the evidence and representations received during the Deposit consultation, the Inspector must determine whether the RLDP accords with the 'tests of soundness' set out in the Development Plans Manual.
- 1.16 Following the examination, the Inspector will issue a report recommending any necessary changes to the RLDP. The Inspector's report will be binding and the Council must accept the changes and adopt the RLDP as amended. Once adopted, the RLDP will replace the existing Adopted LDP.

2 Context

Monmouthshire Profile and Overview

- 2.1 This section provides a broad introduction to the Plan area, outlining the key economic, social, environmental and cultural characteristics of Monmouthshire. It also identifies the policy context and other influences on the Plan due to the requirement to have regard to a range of plans, policies and programmes at the national, regional and local level. 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

- 2.2 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’⁶. Monmouthshire has an estimated population of 92,961⁷, of which around 7% reside within the Brecon Beacons 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 Brecon Beacons 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.
- 2.3 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 Brecon Beacons National Park to the north-west and the river corridor of the Wye Valley Area of Outstanding Natural Beauty in the east.
- 2.4 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. A walkway rail station is proposed at Magor with Undy.

⁶ Corine Landcover Inventory

⁷ 2021 Census

Settlement Pattern

- 2.5 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. 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 is 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

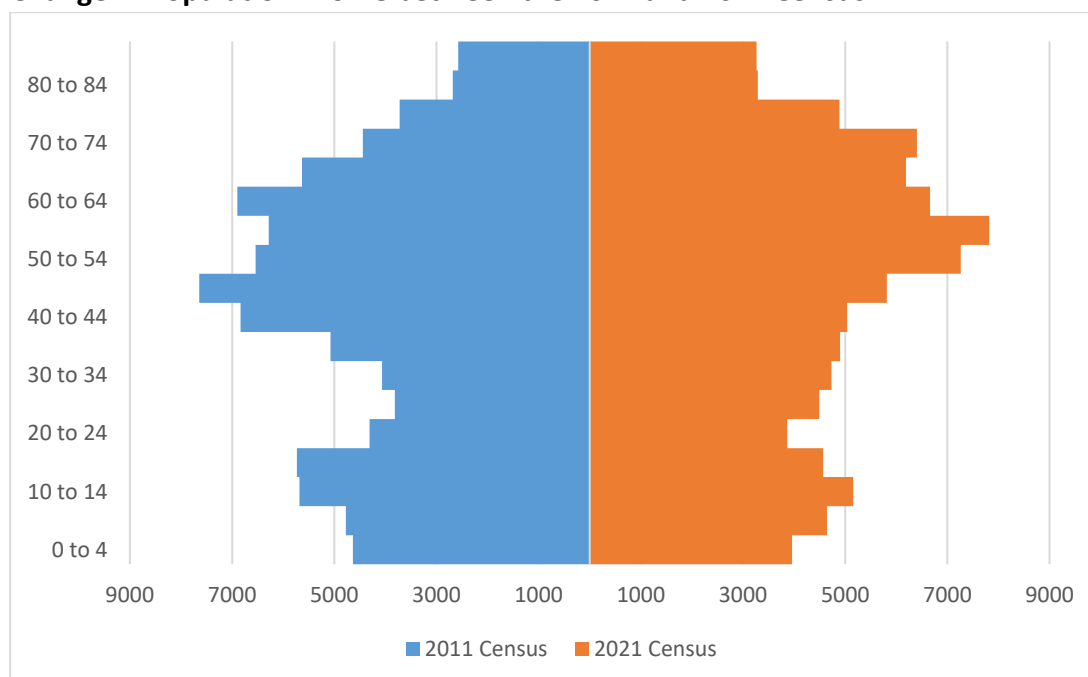
- 2.6 Monmouthshire is renowned for its beautiful landscapes and biodiversity resource. As a largely rural County, Monmouthshire has significant landscape resources and is home to internationally and nationally designated landscapes ranging from the Wye Valley AONB to the east and the Brecon Beacons 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 Sites of Importance for Nature Conservation (SINCs).
- 2.7 The Monmouthshire RLDP area also has a rich built heritage and historic environment which includes, 31 Conservation Areas, 45 Historic Parks and Gardens, 3 Landscapes of Outstanding Historic Interest, approximately 164 Scheduled Ancient Monuments and 2,149 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

- 2.8 Monmouthshire has a population of 92,961 based on the 2021 Census. As a predominantly rural county, the four primary settlements of Abergavenny, Caldicot, Chepstow and Monmouth account for over half of the population between them at 52%.
- 2.9 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% this 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). The change in the population profile of Monmouthshire in the past 10 years is shown clearly in the population pyramid below. However, this differs by settlement across the County. The continuing trend for an ageing demographic is one of the key issues that Monmouthshire is facing.

Change in Population Profile between the 2011 and 2021 Census



2.10 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 £398,859 when compared to the Welsh average of £236,439 (Hometrack, November 2022)⁸. 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, showing children having to live with parents for longer. This issue has been heightened by the Covid-19 pandemic which has demonstrated the importance of ensuring our communities are balanced and socially sustainable, particularly in terms of demography.

⁸ Based on sales and valuations over six month period March 2022 – August 2022. Sales only over same period related to £351,643 for Monmouthshire and £224,101 for Wales. Data accessed on 02/11/2022.

Economy

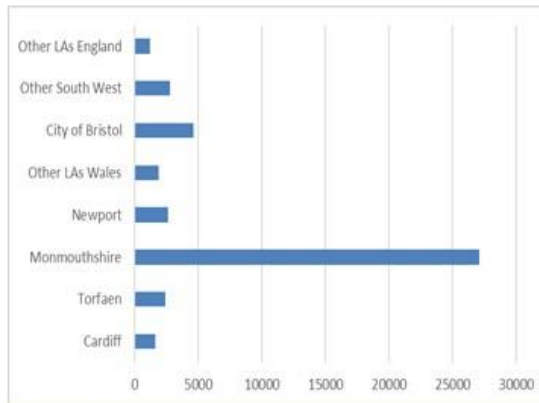
- 2.11 As the gateway to Wales, Monmouthshire is geographically well connected in a key strategic location with good transport infrastructure linking to the wider region. The County enjoys close proximity to the key growth areas of Cardiff, Bristol, Newport and the Midlands and is only a 45 minute drive 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 2021). Our residents are among the best qualified in Wales.⁹
- 2.12 Monmouthshire is a key partner in the Cardiff Capital City Deal and given its geographical location connected to the Bristol City Region this makes it an attractive proposition for economic development.
- 2.13 The April 2021 – March 2022 ONS Annual Population Survey indicated that nearly 80% (79.7%) of Monmouthshire’s working-age population were economically active, higher than the figure for Wales, at 76.5%. Whilst the proportion of the economically active of working age unemployed in Monmouthshire was 2.9% compared to 3.8% in Wales.
- 2.14 Monmouthshire has a strong core of agri-food, tourism, manufacturing, digital and tech businesses. The Council’s Economic Growth and Ambition Statement¹⁰ recognises the importance of building on this success to generate growth in a spectacular setting. Maintaining the attractiveness of Monmouthshire to its current and future residents and visitors through sustainable growth is a key aim of the RLDP.
- 2.15 The ONS 2021 Annual Population Survey reveals that 61% of residents who are employed work within the county. The county had a net out-commute of some 2,800 residents. Of those commuting out for employment nearly 27% were commuting to the City of Bristol and a further 23% 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.¹¹

⁹ ONS Annual Population Survey (12 months to June 2022)

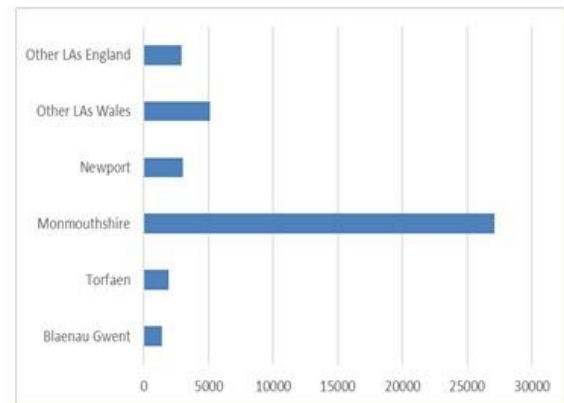
¹⁰ The Economic Growth and Ambition Statement can be viewed via <https://www.monmouthshire.gov.uk/planning-policy/development-of-an-evidence-base/>

¹¹ [Smarter working: a remote working strategy for Wales \[HTML\] | GOV.WALES](#)

Where residents of Monmouthshire Work



Where those who work in Monmouthshire live



- 2.16 An Employment Background Paper¹² is prepared annually which assesses take-up of allocated employment land in the adopted LDP's (Identified Industrial and Business Sites under policy SAE1 and Protected Employment Sites under policy SAE2). The results from this annual survey will help to inform future employment land requirements. As of March 2022, 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.
- 2.17 Given the increased propensity in agile and home working which began during the Covid-19 pandemic employment land demand/ requirements may change. However, the RLDP will continue to need to provide a range of sites to meet employment needs to 2033 to support the Council's ambitions and to support the local economy. The spatial distribution of employment land will be given further consideration in the Deposit RLDP which will include the identification of suitable employment sites and premises to enable existing businesses to grow and to attract new businesses in key growth sectors.

Influences on the Replacement Local Development Plan

Legislative Context

- 2.18 The Preferred Strategy 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 3.

¹² The Employment Land Background Paper – May 2022 can be viewed via <https://www.monmouthshire.gov.uk/planning-policy/annual-monitoring/employment/>

3 Key Issues, Challenges and Opportunities

Key Issues and Challenges

3.1 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 Paper¹³ (updated December 2022) and set out in Appendix 4. 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, challenges and opportunities is provided below:

- We have the highest average house prices in Wales (see para 2.10). 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 2,200 households identified as being in need of affordable housing¹⁴. The RLDP will explore opportunities to increase the number of affordable homes and ensure a range and choice of homes are incorporated within new developments.
- Our population is getting older. By 2033 we will have more old people living in the County but fewer young people (see para 2.9). 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.
- The Council has declared a climate emergency and has committed to strive to limit the increase in global temperatures to 1.5°C and strengthened emphasis on nature recovery. The RLDP will provide 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 will establish policy to support and enable renewable energy generation and establish requirements for net zero carbon ready developments and other sustainable development principles such as active travel, green infrastructure and local food production. These will sit alongside and integrate with policies for protection of sites designated for biodiversity, habitats and species and deliver on Net Biodiversity Benefit.

¹³ The Issues, Vision and Objectives Paper can be viewed via <https://www.monmouthshire.gov.uk/planning-policy/development-of-an-evidence-base/>

¹⁴ MCC Affordable Housing Prospectus 2022

- 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, 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.
- There is a need to consider whether existing employment land is suitably located and fit for purpose for appropriate growth sectors, 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.
- There are opportunities associated with growth from both the Cardiff Capital Region and Bristol region.
- Unemployment levels are low (see para 2.13); 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 (see para 2.15). To address these issues there is a need to provide support for inward investment and local employment growth/opportunities.
- Vacancy rates in some of the County's town and local centres have increased¹⁵ due to changing shopping habits including internet shopping and economic factors such as high business rates and the cost of living crisis.
- There are challenges of rural isolation and sustaining rural communities, including regenerating the rural economy. The recent pandemic has 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.

¹⁵ Evidence is contained in the Retail section of the 2020-2021 Annual Monitoring Report
<https://www.monmouthshire.gov.uk/app/uploads/2021/11/Monmouthshire-LDP-AMR-2020-2021.pdf>

- 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 £245m to Monmouthshire in 2019 (latest figures available) and supported the equivalent of 3,119 full-time jobs (STEAM report 2019).

Development Constraints

- 3.2 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 landscape 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 the Preferred Strategy, with some key constraints discussed below.

Water Quality in Riverine Special Areas of Conservation (SAC)

- 3.3 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 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. In response, NRW has issued detailed planning guidance to ensure that the environmental capacity of the rivers does not deteriorate any further. A plan of the catchment area of the rivers can be found on the Council's website via: <https://www.monmouthshire.gov.uk/planning/water-quality> .
- 3.4 NRW has provided planning guidance outlining 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.
- 3.5 This new guidance has significant implications for development proposals within the river catchment areas. We are working with NRW, Dŵr Cymru Welsh Water, Welsh Government, the development industry and our biodiversity officers to find solutions to enable growth and allocate candidate sites through the RLDP process that do not harm the environmental capacity of our watercourses. **Recent discussions with Dŵr Cymru Welsh Water (DCWW) have confirmed that a workable and achievable solution**

to phosphates has now been identified for the Monmouth Wastewater Treatment Works (WwTW) (benefitting the River Wye Catchment), in addition to previously confirmed improvement works at the Llanfoist Wastewater Treatment Works (WwTW) serving Abergavenny (benefitting the upper River Usk catchment). The removal of this spatial constraint in the Monmouth area means that RLDP can now allocate new affordable-housing-led development within Monmouth. Following discussions with Dŵr Cymru Welsh Water (DCWW) and NRW have confirmed that a workable and achievable solution has now been identified for the Llanfoist Wastewater Treatment Works (WwTW) (upper River Usk catchment), but there is no identified strategic solution for phosphate mitigation at the Monmouth WwTW (upper River Wye catchment) at this time. Without an identified strategic solution, new site allocations for future growth within the affected upper River Wye catchment area cannot be evidenced to be deliverable within the Plan period. Consequently, no new site allocations can be proposed within the upper River Wye catchment, including the primary settlement of Monmouth. The restrictions on new housing and employment development in this area during the Plan period are reflected in the RLDP spatial strategy. These WwTW improvements are currently subject to design and regulatory approval, however, there is a firm commitment that these improvements will be completed by 31st March 2025. 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.

- 3.6 A [Phosphates Briefing Update](#) was sent to all those on the RLDP Database in July 2023. This provided an update on the on the challenging environmental issue of water quality in both the River Wye and River Usk and the implications for the RLDP which is reflected in this updated Preferred Strategy.

Site Search Sequence and Best and Most Versatile Agricultural Land

- 3.7 The approach to site selection for the Deposit Plan will follow the site search sequence outlined in PPW11, which prioritises the use of suitable and sustainable previously developed land before considering greenfield sites. This process must, however, acknowledge the limited brownfield resource available in Monmouthshire and the environmental, social and economic considerations that need to be balanced in a Monmouthshire context.
- 3.8 A key consideration in assessing the Candidate Sites will be the high percentage of Best and Most Versatile (BMV) agricultural land within Monmouthshire. Appendix 5 sets out the Council's anticipated approach to assessing the potential loss of BMV agricultural land. This will be developed further to provide an Agricultural Land Classification Background Paper for Deposit RLDP stage. 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

- 3.9 Policy 34 of Future Wales requires the 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. In advance of an SDP, the indicative area shown for consideration in Future Wales should be treated as a designated Green Belt.
- 3.10 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 will be given to paragraph 3.72 of PPW11 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. A Green Belt Study has been commissioned on a sub-regional basis to inform the evidence base of RLDPs and the South East Wales SDP.

Key Opportunities

- 3.11 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)

- 3.12 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 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 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)

- 3.13 The Covid-19 pandemic has resulted in many challenges, but it 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-19¹⁶ recovery policy document recognises this, and the opportunity it has created to embed behavioural shift and the increased importance of placemaking. The RLDP is a key mechanism to deliver on Covid-19 recovery. 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

- 3.14 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°C. As recognised by PPW11 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.
- 3.15 In recognition of urgent need to address water quality in the County, the Climate Emergency Action Plan November 2021 update included the requirement to prepare an action plan to address 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 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

¹⁶ Building Better Places – Placemaking and the Covid-19 recover – July 2020 can be viewed via: <https://gov.wales/sites/default/files/publications/2020-07/building-better-places-the-planning-system-delivering-resilient-and-brighter-futures.pdf>

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

3.16 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

3.17 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 draft Community and Corporate Plan¹⁷ goal of being a thriving and ambitious place, full of hope and enterprise.

¹⁷ The draft Community and Corporate Plan 2022 sets out the Council's core purpose, principles, and priorities. It was endorsed by Cabinet on 19th October 2022 and a developed version will be reported to Council in January 2023 adopted by Council on 20th April 2023.

3.18 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.

4 RLDP Strategic Framework

RLDP Vision (2018-2033)

- 4.1 The Vision clarifies the core purpose of the RLDP and provides a framework for developing the Preferred Strategy and future detailed 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 PSB Well-being Plan and draft Community and Corporate Plan¹⁸ and to reflect the new growth and spatial strategy.

By 2033 Monmouthshire will be a place where:

- (1) People are living in sustainable, resilient communities that support the well-being of current and future generations and are more inclusive, equal, safe, cohesive, prosperous, vibrant and balanced demographically. Both urban and rural communities are well-connected with better access to local services and facilities, open space and employment opportunities.**
- (2) Communities and businesses are part of an economically thriving, ambitious and well-connected County.**
- (3) The best of the County's built heritage, countryside, biodiversity, landscape and environmental assets have been protected and enhanced to retain its distinctive character.**
- (4) 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.**

The implications of achieving this Vision will be that by 2033 Monmouthshire will be home to well-connected exemplar, affordable housing-led, net zero carbon ready places that provide employment and support demographically balanced sustainable and resilient communities for all.

RLDP Objectives (2018-2033): Delivering the Vision

- 4.2 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 and the well-being objectives set out in the Monmouthshire PSB Well-being Plan. The objectives are kept under review and updated as necessary as part of the continued development of the RLDP evidence base. The RLDP will deliver Council's objectives and address the core issues of delivering essential affordable homes at pace and scale, responding to the climate and nature emergency by delivering net zero carbon ready new homes in exemplar places, and ensuring our communities are socially and

¹⁸ The draft Community and Corporate Plan 2022 sets out the Council's core purpose, principles, and priorities. It was endorsed by [Cabinet on 19th October 2022](#) and a developed version will be reported to Council in January 2023 [adopted by Council on 20th April 2023](#).

economically sustainable by attracting and retaining younger people to rebalance our ageing demographic.

- 4.3 The Objectives are sufficiently aspirational yet also achievable within a spatial planning context. 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 (PPW11) and the Monmouthshire PSB Well-being Plan objectives, as set out in Table 1. The objectives are not listed in priority order.

Table 1 – RLDP Objectives

RLDP Objective Number	Headline	RLDP Objective	RLDP Issues addressed	Main PPW11 theme	Monmouthshire PSB Well-being Plan objective
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	Develop opportunities for communities and business to be part of an economically thriving and well-connected county.
Objective 2	Town and Local Centres*	To sustain and enhance the County’s towns of Abergavenny, Caldicot, Chepstow, Monmouth, and local centres of Magor, Raglan 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	Develop opportunities for communities and business to be part of an economically thriving and well-connected county.
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.	11, 12, 35	Distinctive and natural places	Protect and enhance the resilience of our natural environment whilst mitigating and adapting to the impact of climate change.

RLDP Objective Number	Headline	RLDP Objective	RLDP Issues addressed	Main PPW11 theme	Monmouthshire PSB Well-being Plan objective
		This includes the Wye Valley Area of Outstanding Natural Beauty, the County's other high quality and distinctive landscapes, protected sites, protected species and other biodiversity interests.			
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	Protect and enhance the resilience of our natural environment whilst mitigating and adapting to the impact of climate change.
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	Protect and enhance the resilience of our natural environment whilst mitigating and adapting to the impact of climate change.
Objective 6	Land-	To promote the efficient use of land, including the need to: <ul style="list-style-type: none"> maximise opportunities for development on previously developed land, whilst recognising that brownfield 	16, 17	Strategic and spatial choices	Protect and enhance the resilience of our natural environment whilst mitigating and adapting to the impact of climate change.

RLDP Objective Number	Headline	RLDP Objective	RLDP Issues addressed	Main PPW11 theme	Monmouthshire PSB Well-being Plan objective
		<p>opportunities are limited in Monmouthshire.</p> <ul style="list-style-type: none"> 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. 			
Objective 7	Natural resources	To promote 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	Protect and enhance the resilience of our natural environment whilst mitigating and adapting to the impact of climate change.
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	Provide children and young people with the best possible start in life.
A More Equal Wales (Well-being Goal 4)					

RLDP Objective Number	Headline	RLDP Objective	RLDP Issues addressed	Main PPW11 theme	Monmouthshire PSB Well-being Plan objective
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	Respond to the challenges associated with demographic change.
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	Respond to the challenges associated with demographic change.
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	Respond to the challenges associated with demographic change.
Objective 12	Communities	To build sustainable resilient communities where people have good access to 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	Develop opportunities for communities and business to be part of an economically thriving and well-connected county.
Objective 13	Rural Communities	To sustain existing rural communities as far as possible by providing affordable homes and development opportunities of an	6, 7, 20, 22, 26, 29, 30, 34	Productive and	Develop opportunities for communities and business to be part of

RLDP Objective Number	Headline	RLDP Objective	RLDP Issues addressed	Main PPW11 theme	Monmouthshire PSB Well-being Plan objective
		appropriate scale and location in rural areas in order to assist in building sustainable rural communities and strengthening the rural economy.		enterprising places	an economically thriving and well-connected county.
Objective 14	Infrastructure*	To ensure that appropriate physical and digital infrastructure (including community and recreational facilities, sewerage, water, transport, schools, health care and broadband etc.) is in place or can be provided to accommodate new development.	12, 19, 20, 31	Productive and enterprising places	Develop opportunities for communities and business to be part of an economically thriving and well-connected county.
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	Develop opportunities for communities and business to be part of an economically thriving and well-connected county.
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	Protect and enhance the resilience of our natural environment whilst mitigating and adapting to the impact of climate change.

RLDP Objective Number	Headline	RLDP Objective	RLDP Issues addressed	Main PPW11 theme	Monmouthshire PSB Well-being Plan objective
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 ready 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	Protect and enhance the resilience of our natural environment whilst mitigating and adapting to the impact of climate change.

* indicates the Objective has increased emphasis and importance in light of Covid-19

Preferred Strategy

- 4.4 The Preferred Strategy sets out a new direction for the RLDP to ensure sustainable growth in the County, embodying the principles set out in the draft Community and Corporate Plan of tackling inequality, protecting our environment and adapting to a world being reshaped by climate change. The Preferred Strategy has been informed by a wide range of evidence¹⁹ and responds to a number of challenges that have arisen following stakeholder consultation and engagement on the previous Preferred Strategy in Summer 2021, namely the Welsh Government objection to the level of growth set out in that Preferred Strategy²⁰ and water quality issues in the Rivers Wye and Usk²¹.
- 4.5 The Council has considered how best to progress the RLDP having regard to these challenges, whilst also ensuring that the RLDP delivers on our objectives and addresses our core issues of delivering essential affordable housing at pace and scale, responding to the climate and nature emergency by delivering net zero carbon ~~ready~~ new homes for our communities, and ensuring our communities are socially and economically sustainable by attracting and retaining younger people to rebalance our ageing demographic. In September 2022 Council endorsed the proposal²² to proceed with a new growth and spatial strategy that responds to these challenges and maximises delivery of these core issues and objectives within the environmental and national policy constraints. Further details on the strategy options considered are set out in the Growth and Spatial Options Paper, September 2022. In response, the new Preferred Strategy proposes a lower level of growth and an amended spatial strategy that responds to these challenges.
- 4.6 The Preferred Strategy:
- **Makes provision for approximately 5,400 - ~~5,940~~ 6,210 homes over the Plan period 2018-2033²³.** This includes the provision of approximately 1,580 - ~~1,850~~ 1,910 affordable homes. As there are currently approximately ~~3,740~~ 4,085 homes

¹⁹ Our key issues, vision and objectives, Local Wellbeing Plan, community consultation and engagement sessions, the Integrated Sustainability Appraisal (ISA), the Sustainable Settlement Appraisal, National Planning Policy including Future Wales; the National Plan 2040, and the LDP tests of soundness.

²⁰ Welsh Government's Planning Division raised significant concerns regarding the Strategy's proposed level of growth and 'general conformity' with policies 1 and 33 of the Future Wales 2040: the National Plan, suggesting that growth in Monmouthshire would undermine growth in the national growth area of Cardiff, Newport and the Valleys. Welsh Government unusually prescribed a maximum growth of 4,275 dwellings over the Plan period, which is below the Adopted LDP's annual dwelling requirement (450) and the June 2021 Preferred Strategy's dwelling requirement figure (507).

²¹ Phosphate water quality issues are detailed in Chapter 3

²² [Council meeting 27th September 2022](#)

²³ In accordance with the Development Plans Manual (WG, March 2020) an allowance is provisionally made for a ~~10%~~ 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. The flexibility allowance will be given further consideration and refined at Deposit stage.

in the housing landbank²⁴, **land will be allocated for approximately 1,660 - 2,200 - 2,125 new homes, including 830 - 1,100 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 6 and an updated Housing Background Paper that will accompany the Deposit Plan.

- Sets out the planning policy framework to enable the **provision of approximately 6,240 additional jobs** by allocating sufficient employment land in the right places in the County to meet the needs of new and existing businesses. The Plan will also include policies to facilitate growth in retail, leisure and tourism sectors. The RLDP will be supported by an economic development strategy.
- **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. **Preferred strategic sites are identified to expand the Primary Settlements of Abergavenny, Caldicot, Chepstow and Monmouth (Strategic Policy S7). Other detailed site allocations will be set out in the Deposit RLDP.** ~~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, no new site allocations are proposed in the primary settlement of Monmouth or within the upper River Wye catchment area north of Bigsweir Bridge.~~
- ~~Identifies Preferred Strategic Site Allocations in the primary settlements of Abergavenny, Chepstow and Caldicot, including Severnside. Other detailed site allocations will be set out in the Deposit RLDP.~~
- Limits the impact of climate change by ensuring **new homes are net zero carbon ready and well connected with existing settlements**, providing attractive and accessible places to live and work.
- **Sets out strategic policies** on a range of topic areas, reflecting the four placemaking themes in Planning Policy Wales (PPW)²⁵.

4.7 ~~It is recognised that the Preferred Strategy is unable to deliver the Council's objectives, including the delivery of new affordable homes, in those settlements in the upper River Wye catchment. In the absence of identified strategic solutions to the treatment of phosphates in the River Wye catchment area during the Plan period, this shortcoming is unavoidable and it is not possible to allocate sites for new growth (homes and employment) in the affected river catchment. In contrast, strategic solutions are being developed to enable the treatment of phosphates in the River Usk catchment area which enables sustainable growth within the most sustainable~~

²⁴ 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.

²⁵ PPW edition 11, WG, February 2021.

~~settlements within the River Usk catchment area over the Plan period. The southern part of the County remains unaffected by this issue.~~

- 4.8 ~~If a strategic solution to the phosphate issue is developed in the Monmouth WwTW during the Plan period, then windfall sites within development boundaries could be developed. In accordance with the Development Plans Manual, these will be considered as ‘bonus sites’ and will not count towards our housing figures. It is proposed to include the following sites within the settlement boundary for Monmouth:~~
- ~~Current LDP allocation at Drewen Farm, off Wonastow Road (approximately 110 homes);~~
 - ~~Current LDP allocation at Tudor Road, Wyesham (approximately 35 homes);~~
 - ~~Site with planning permission at Rockfield Road (approximately 130 homes).~~
- ~~The above sites have been unable to proceed at present due to the water quality constraint. In contrast, all other allocated housing sites within the adopted LDP that have not been delivered will be de-allocated.~~

Preferred Level of Growth

- 4.9 Strategic Policy S1 sets out the RLDP’s Preferred Growth Strategy.

Strategic Policy S1 – Preferred 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:

- **5,940* 6,210* homes** to meet a housing requirement of 5,400 homes
- **6,240 new jobs**

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 ~~10%~~ 15% flexibility allowance, which will be subject to further consideration and refinement at Deposit Plan stage

- 4.10 The Preferred Growth Strategy is based on a demographic-led scenario with added policy assumptions²⁶. It provides a level of growth (homes and jobs) that ~~maximises the extent to which we~~ addresses our local evidence-based issues and objectives ~~in the south of the County and River Usk catchment area~~, 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, ~~and the issues identified in paragraph 4.7.~~

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, as **this will be set out in an updated Housing Background Paper that will accompany the Deposit Plan.**

- 4.11 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, our evidence shows that the proposed 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.
- 4.12 The Strategy also meets a key ‘Tests of Soundness’ of ensuring that the Plan is locally specific, addresses key issues, is supported by robust, proportionate and credible evidence, and the Plan’s vision and strategy are positive and sufficiently aspirational. A Self-Assessment of the Preferred Strategy against the Tests of Soundness includes an assessment of the Strategy’s general conformity with Future Wales 2040. This demonstrates that the Preferred Strategy and the stages undertaken and processes followed to reach this stage are ‘sound’, and that the Strategy assists in the delivery of key Future Wales policies and is in general conformity with its overarching strategy.

Preferred Growth Strategy: Addressing our Key Issues and Objectives

Delivery of Affordable Housing

- 4.13 The RLDP will deliver approximately 5,400 - ~~5,940~~ 6,210 homes over the Plan period 2018-2033. This includes the provision of 1,580 - ~~1,850~~ 1,910 affordable homes, of which approximately 830 – ~~1,100~~ 1,065 will be delivered through new housing allocations.
- 4.14 The Preferred Strategy 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 (see para 2.10) and high house prices in relation to earnings in the County has 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 recent pandemic has further increased the need for affordable homes and revealed the extent of hidden homelessness in the County. The Minister, formerly known as the Minister for Housing and Local Government, announced that post-Covid-19, no-one should return to the streets and Welsh Government’s Building Better Places response to Covid-19 also highlights how the delivery of new social and market housing can make a significant contribution to economic recovery and social cohesion.

- 4.15 The Strategy 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 Strategy enables the Council to consider alternative mechanisms for delivering affordable homes and all opportunities to increase the supply of affordable housing will be explored.
- 4.16 To deliver on the key objectives, a commitment is needed to ensure that the new site allocations provide 50% affordable homes. For residential sites to be allocated in the RLDP, it will be essential to demonstrate that sites 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 ~~ready~~ homes and associated infrastructure to ensure the development is 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. This commitment could have financial implications for the Council of reduced land sale receipts and the potential need to CPO sites to bring them forward. This approach is supported by Future Wales 2040 Policy 3 which supports public leadership and the use of public land to deliver on ambitious affordable housing targets. Additional viability work will be required to demonstrate site viability and deliverability based on these policy requirements. The RLDP will be accompanied by an Infrastructure Plan and updated Local Transport Plan to ensure essential infrastructure is delivered.
- 4.17 The homes that we create will need to match people’s ability to pay. Development will be informed by the Local Housing Market Assessment which currently shows that 34% of homes on new sites will need to be social housing for rent and another 16% will need to be at less than market price or market rent. The LHMA is being updated based on a new Welsh Government template, but given increased property prices and the cost of living crisis, social rented affordable housing is expected to remain the greatest proportion of need. The Council will work with the Welsh Government, Registered Social Landlords and house developers to ensure that this is achieved. The spatial strategy 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 Ageing Population

- 4.18 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.

- 4.19 The strategy proposes a level of growth that begins to address the unbalanced and ageing demographic with an increase in younger and working age groups²⁷. The provision of 50% affordable housing as well as potential policy intervention to ensure the market sector housing provides a suitable range and mix of house sizes will assist in attracting and retaining a younger, economically active population and balancing the ageing population.
- 4.20 Requiring the provision of a wider choice of smaller market and affordable homes will provide opportunities for younger people to both stay in and move to the area. Enabling younger people to live and work in Monmouthshire will assist in making our ageing communities more socially and economically sustainable, the importance of which has been clearly demonstrated during the recent pandemic.

Responding to the Climate and Nature Emergency

- 4.21 The Strategy proposes a level of growth that secures the economic, social and cultural sustainability of Monmouthshire's communities without compromising the environmental sustainability. All new homes will be required to be sustainable in construction and liveability (net zero carbon ready), reflecting the Council's commitment to responding to and tackling climate change, and will be well connected with existing settlements, adding to their sustainability. Placemaking principles will underpin all new developments ensuring we deliver attractive and accessible places to live and work.

Supporting Sustainable Economic Growth

- 4.22 The Strategy seeks to address the issues currently impacting on economic growth such as a shrinking working age population and high levels of out commuting. The Strategy provides the planning policy framework to enable the provision of 6,240 additional jobs over the Plan period (416 jobs per annum). Not all of these jobs will be in planning B-class uses: jobs will be delivered through a range of sectors such as tourism, leisure and retail. Supporting job growth in the County 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.
- 4.23 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

²⁷ Provides an uplift in younger (0-19, +880) and working age (30-49, +3,222) groups

opportunity for many people to live and work in the same location via a remote working approach.

- 4.24 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 home²⁸, making it less important where the jobs are located as commuting is reduced as a result of changing working habits.
- 4.25 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. The recent pandemic has also affected home-buying trends with an emphasis on quality of life, house size and access to outdoor green space rather than a focus on commuting times. 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.
- 4.26 The Preferred Growth Strategy promotes sustainable economic growth that will help reduce levels of commuting and promote self-contained communities, ensuring the environmental 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 Economic Growth and Ambition Statement, Investment Prospectus 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. Further information on employment land provision is set out in Strategic Policy S12.

S1 – Preferred Growth Strategy - 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

²⁸ Smarter Working: a Remote Working Strategy for Wales, Welsh Government (2022)

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 11 (WG, February 2021)	Strategic and Spatial Choices Theme (Chapter 3)
Building Better Places (WG, July 2020)	Priorities and Actions for Places - Post Covid-19 Considerations: Staying local: creating neighbourhoods (Page 14) Changing working practices: our future need for employment land (Page 20)
Well-being of Future Generations Act (WBFGA) (WG, 2015)	A prosperous Wales A resilient Wales A more equal Wales A Wales of cohesive communities
Monmouthshire PSB Well-being Plan (MWBP) (February 2018)	<ul style="list-style-type: none"> • Respond to the challenges associated with demographic change. • Develop opportunities for communities and businesses to be part of an economically thriving and well-connected county.
Monmouthshire draft Community and Corporate Plan 2022 2023	<p>This policy supports the draft Community and Corporate Plan goals of ensuring Monmouthshire is a:</p> <ul style="list-style-type: none"> • 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; • learning place where everybody has the opportunity to reach their potential.
Key Evidence	Growth and Spatial Options Paper – September 2022 Updating the RLDP Demographic Evidence Report, Edge Analytics November 2021

	Housing Background Paper – December 2022 to be updated to accompany the Deposit Plan
Monitoring	TBC
Detailed Policies	TBC in Deposit RLDP

Preferred 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:				
Settlement Hierarchy		Indicative Distribution of Residential Growth*		Distribution of Employment Growth
		Indicative % of distribution	Indicative No. of homes	
Tier 1	Primary Settlements: <ul style="list-style-type: none"> Abergavenny (inc. Llanfoist) Chepstow Monmouth (inc. Wyesham) Caldicot (inc. Severnside Area comprising of: Caerwent, Crick, Magor Undy, Portskewett, Rogiet and Sudbrook) 	24% 23% 13% 5% 15% 44% 35% across Severnside Area	1,403 769 795 275 909 2,609 2,195 across Severnside Area	This will be set out in the Deposit RLDP and will be consistent with the spatial strategy and commensurate to the level of housing growth.
Tier 2	Secondary Settlements: <ul style="list-style-type: none"> Penperlleni Raglan Usk 	6% 5% across Secondary Settlements	380 341 across Secondary Settlements	
Tier 3	Main Rural Settlements: Devauden Dingestow Little Mill Llandogo Llanellen Llangybi Llanover Llanvair Discoed Mathern Pwllmeyric	8% 9% across Main Rural and Minor Rural Settlements (Tiers 3 and 4)	504 567 across Main Rural and Minor Rural Settlements (Tiers 3 and 4)	

	Shirenewton/ Mynyddbach St Arvans Tintern Trellech Werngifford/Pandy			
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			

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

Within Tier 4 – Minor Rural Settlements, minor infilling between existing buildings will be considered acceptable, subject to the detailed policy requirements to be 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 10% 15% flexibility allowance which will be subject to further consideration and refinement at Deposit Plan stage. The spatial distribution figures should be treated as indicative as they may alter following detailed Candidate Site assessment work.

- 4.27 Policy S2 seeks to focus new development associated with the Preferred Strategy on the primary settlements of Abergavenny (including Llanfoist), Chepstow , **Monmouth** and Caldicot including the Severnside area, together with a lower level of growth to 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 indicative proportion of residential growth to be accommodated by each of the settlement tiers (a full breakdown ~~can be found in the~~ **will be available in an updated Housing Background Paper that will accompany the Deposit Plan**).
- 4.28 The Settlement Hierarchy reflects the findings of the Sustainable Settlement Appraisal²⁹, 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 of transport and accessibility, facilities and services, and employment provision. The appraisal confirms the dominant role of the primary settlements of Abergavenny, Chepstow, Caldicot and Monmouth. The report recognises that some of the lower tier settlements have a close geographical and functional relationship with a Tier 1 settlement and have therefore been clustered together. The settlements along the M4 corridor 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 recognised the strong relationship between Abergavenny and Llanfoist and Monmouth and Wyesham.
- 4.29 The spatial strategy also has regard to the latest position on the water quality issue and associated requirements to demonstrate phosphate neutrality or betterment when proposing development. The strategy has been ~~developed~~ **updated** following recent discussions with Dŵr Cymru Welsh Water on future strategic solutions for phosphate mitigation within the river catchment areas **which have confirmed a workable and achievable solution to phosphates has now been identified for the Monmouth Wastewater Treatment Works (WwTW) (benefitting the River Wye Catchment), in addition to previously confirmed improvement works at the Llanfoist Wastewater Treatment Works (WwTW) serving Abergavenny (benefitting the upper River Usk catchment).** The removal of this spatial constraint in the Monmouth area

²⁹ The Sustainable Settlement Appraisal can be viewed on the Council's website via the following link:

means that RLDP can now allocate new affordable-housing-led development within Monmouth. Accordingly, the updated Preferred Strategy identifies a strategic site allocation in Monmouth at Leasbrook for approximately 270 homes (Policy S7 refers). This is in addition to three 'legacy' sites in the town comprising 275-290 new homes carried forwards from the adopted LDP or existing planning consents/applications but unable to progress due to the phosphate restriction:

- the current LDP allocation at Tudor Road, Wyesham (35 – 50 homes);
- the current LDP allocation at Drewen Farm, Monmouth (110 homes);
- the extant planning permission at Rockfield Road, Monmouth (70 homes);
and
- a new allocation for the remaining 60 homes at Rockfield Road, Monmouth.

~~Due to the lack of an identified strategic solution to the treatment of phosphates at the Monmouth WwTW within the Plan period, no new site allocations can be considered in settlements within the upper River Wye catchment area north of Bigsweir Bridge, including the primary settlement of Monmouth. This constraint has also been factored into the reduced contribution infill and windfall allowances can potentially make in this river catchment. Full details are set out in the Housing Background Paper.~~

4.30 ~~We are, however, committed to finding phosphate solutions for the upper River Wye catchment as the Plan progresses. The RLDP will keep existing LDP allocations in Monmouth within the settlement boundary as 'aspirational sites' which could be developed if a strategic phosphate solution is found for the upper River Wye catchment during the RLDP plan period. Such sites cannot be relied upon to contribute to meeting the housing requirement and will not be included in the detailed housing provision figures. Such an approach will provide potential for development to progress in Monmouth should this environmental constraint be resolved before the end of the Plan period, thereby enabling the provision of much needed homes for those communities.~~

4.31 The exact distribution of development will be identified in the Deposit RLDP. Any decisions on whether or not to allocate particular sites for development will also depend on such issues as their impact on the physical form of the settlement, placemaking, carbon footprint, landscape setting, environmental constraints and infrastructure capacity. Where growth cannot be met in an individual settlement, development will be directed toward a same tier or higher tier settlement within the same Housing Market Area. A map of the Housing Market Areas is provided in the Housing Background Paper. Further refinement of the Main Rural and Minor Rural Settlements will take place for the Deposit Plan to establish which of these settlements are appropriate to accommodate a sustainable amount of growth to meet local needs and support sustainable rural communities.

- 4.32 To encourage the promotion of sustainable communities where residents can live and work in the same area, housing growth will be accompanied by a commensurate amount of employment land. The proportion of employment growth to be accommodated in the settlement tiers will be set out in the Deposit RLDP. Further details on the employment sites provision can found in Policy S12.
- 4.33 Development proposals will be expected to make full and appropriate use of land, with preference given to the development of previously development land, although it is recognised that there are limited opportunities for further significant brownfield development in Monmouthshire. While growth will be 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 RLDP will seek to allocate those sites that are the best connected, most sustainable, best deliver placemaking and are least harmful, which will require balanced consideration and trade-offs at Deposit Plan stage. The same approach has been taken in identifying the Preferred Strategic Allocation for each primary settlement.
- 4.34 Future Wales 2040 (Policy 34) requires the South East Wales 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 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 and national planning policy³⁰ 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. PPW11 states that this may require land to be safeguarded and boundaries of proposed Green Belts must be carefully defined to achieve this. A Green Belt Study has been commissioned on a sub-regional basis to inform the evidence base of RLDPs and the South East Wales SDP.
- 4.35 Table 2 sets out a summary of the overarching indicative spatial distribution of housing provision for the RLDP. A full breakdown of each component is **will be set out in an updated Housing Background Paper that will accompany the Deposit Plan.**

³⁰ PPW11, paragraph 3.72

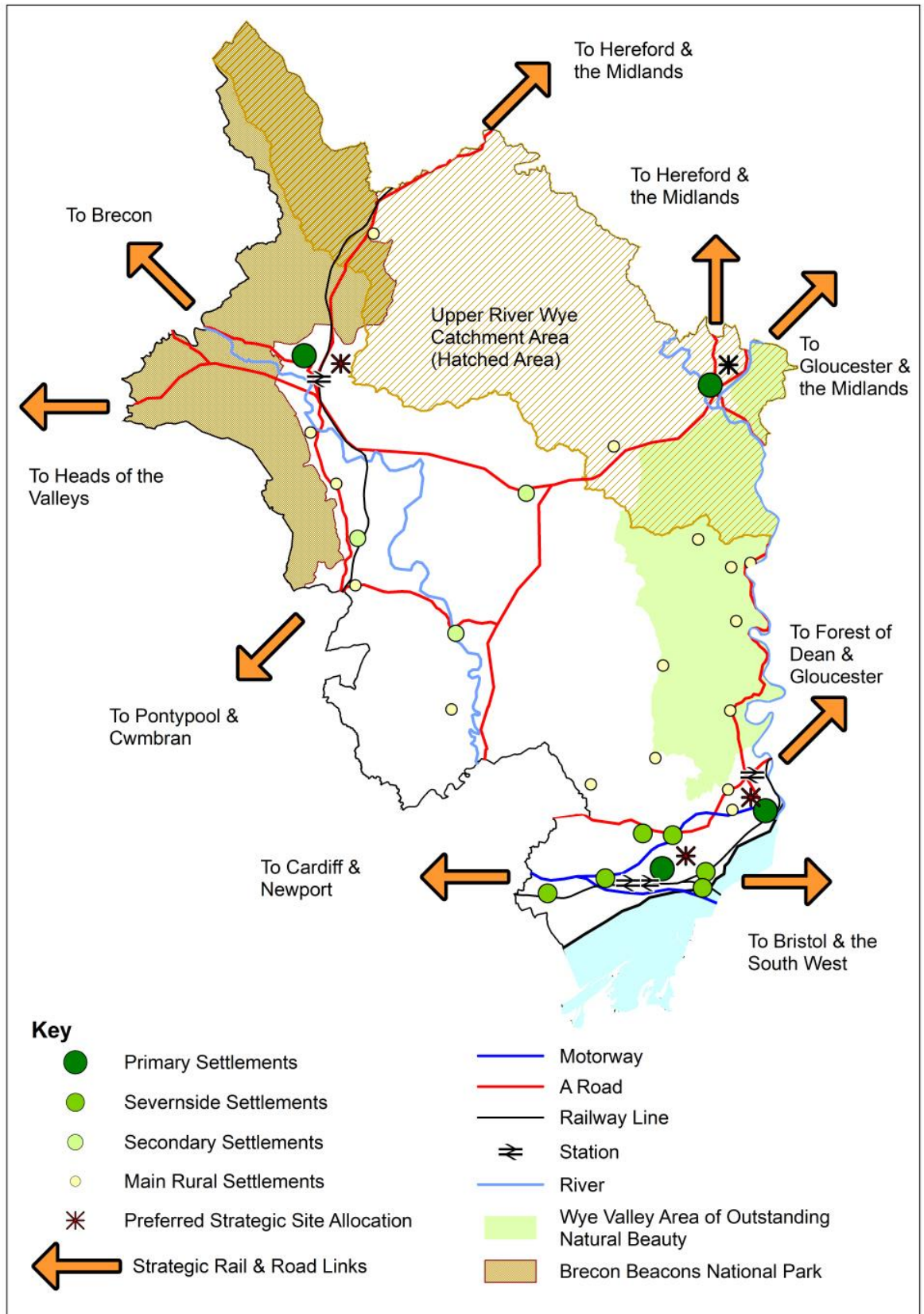
Table 2: Summary of Indicative Spatial Distribution of Housing Provision*

Settlement	Total Commitments			Preferred Strategy		Total Housing Provision 2018-2033*
	Completions 2018-2021 2023	Existing Commitments	LDP Rollover Allocations	Total Allowances (Small Sites; Windfalls)	RLDP New Housing Allocations (Dwellings)	
Abergavenny (incl. Llanfoist)	426 486	132 77	0	245 240	600	1,403
Chepstow	192 315	267 170	0	165 165	145	769 795
Monmouth (incl. Wyesham)	264 267	11 81	145	0 86	0 330	275 909
Caldicot (incl. Severnside)	466 591	723 587	0	220 192	1,200 825	2609 2,195
Secondary Settlements	100 104	45 38	0	80 79	155 120	380 341
Rural Settlements	131 159	83 40	0 15	190 248	100 105	504 567
Total	1,579 1,922	1,261 993	160	900 1,010	2,200 2,125	5,940 6,210

*Figures include an indicative 10% 15% flexibility allowance which will be subject to further consideration and refinement at Deposit Plan stage. The spatial distribution figures should be treated as indicative as they may alter following the consideration of sites submitted as part of the second Call for Candidate Sites and detailed site assessment work.

4.36 The Preferred Strategy is illustrated in the Key Diagram below.

Figure 2: Preferred Strategy Key Diagram



S2 – Spatial Distribution & Settlement Hierarchy - Links to Wider Policy Framework	
RLDP Objectives	Objective 1 – Economic Growth/Employment Objective 9 – Demography Objective 10 – Housing Objective 11 – Place-making Objective 12 – Communities Objective 13 – Rural Communities Objective 15 – Accessibility
Future Wales: The National Plan 2040 (WG, February 2021)	Policy 1 – Where will Wales Grow Policy 3 – Supporting Urban Growth and Regeneration – Public Sector Leadership Policy 4 – Supporting Rural Communities Policy 7 – Delivering Affordable Homes Policy 34 – Green Belts in the South East
Planning Policy Wales Edition 11 (WG, February 2021)	Strategic and Spatial Choices Theme (Chapter 3)
Building Better Places (W G, July 2020)	Priorities and Actions for Places - Post Covid-19 Considerations: Staying local: creating neighbourhoods Active travel: exercise and rediscovered transport methods Changing working practices: our future need for employment land
Well-being of Future Generations Act (WBFGA) (W G, 2015)	A prosperous Wales A resilient Wales A more equal Wales A Wales of cohesive communities
Monmouthshire PSB Well-being Plan (MWBP) (February 2018)	<ul style="list-style-type: none"> • Respond to the challenges associated with demographic change. • Develop opportunities for communities and businesses to be part of an economically thriving and well-connected county.
Monmouthshire draft Community and Corporate Plan 2022 2023	<p>This policy supports the draft Community and Corporate Plan goals of ensuring Monmouthshire is a:</p> <ul style="list-style-type: none"> • 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; • connected place where people feel part of a community, are valued and connected to other;
Key Evidence	Sustainable Settlement Appraisal – December 2022 Candidate Site Register Second Call – February 2022

	Review of Second Call Candidate Sites against the Preferred Strategy – December 2022 Housing Background Paper – December 2022 to be updated to accompany the Deposit Plan
Monitoring	TBC
Detailed Policies	TBC in Deposit RLDP

5 IMPLEMENTATION & DELIVERY - STRATEGIC POLICIES

Introduction

- 5.1 This section sets out the Strategic Policies which form the framework for implementing and delivering the Preferred Strategy of the RLDP as set out in Strategic Policies S1 and S2. The format and structure reflect PPW11’s placemaking themes and the overarching aim of delivering sustainable development. The Strategic Policies are therefore grouped by the planning policy topics clustered around the four placemaking themes in PPW11³¹:

PPW11 Placemaking Themes	Planning Policy Topics Set Out in PPW11
Strategic & Spatial Choices	Good Design / Promoting Healthier Places / The Welsh Language / Sustainable Management of Natural Resources / Strategic Planning / Placemaking in Rural Areas / Managing Settlement Form
Active & Social Places	Transport / Housing / Retail & Commercial Centres / Community Facilities / Recreational Spaces
Productive & Enterprising Places	Economic Development / Tourism / The Rural Economy / Transportation Infrastructure / Telecommunications / Energy / Minerals / Waste
Distinctive & Natural Places	Landscape / Coastal Areas / Historic Environment / Green Infrastructure / Biodiversity / Water, Air, Soundscape & Light / Flooding / De-risking

- 5.2 It should be noted that not all of the PPW11 planning policy topics listed above are covered by the RLDP Strategic Policies. Some of those topics are best considered as underpinning matters of detail via other policies that will be included within the Deposit RLDP. Others are adequately covered by national planning policy and need not be duplicated via the RLDP.
- 5.3 It is recognised that there will be some overlap between the respective themes and the policies and as such they should be read in conjunction with one another. Each section highlights the relevant strategic policy, the reasoned justification for the policy and the summary table following each of the strategic policies provides a link back to the relevant RLDP objectives, Future Wales 2040 policies, PPW11 themes, Building Better Places priorities, Monmouthshire PSB Well-Being Plan (MWBPP) and the Well-being of Future Generations (WBFGE) goals. An outline of how the Deposit Plan will respond with further criteria or topic-based policies, where relevant, is also included. The ‘delivery and monitoring section’ at the end of each policy will be developed as part of the Deposit Plan. A review of the existing Local Development Plan (LDP) detailed Development Management policies is set out in Appendix 7. This identifies

³¹ Figure 6 PPW11 – Page 20

policies which are functioning effectively, those where changes are likely to be required and highlights ones which may no longer be appropriate for inclusion in the RLDP.

STRATEGIC & SPATIAL CHOICES

- 5.4 Within the context of PPW11's Strategic and Spatial Choices theme, the policies within this section focus on setting out how Monmouthshire's preferred level and spatial distribution of growth as set out in policies S1 and S2, will contribute to supporting sustainable and resilient communities for all. Where development does take place, it is important that it contributes to the creation of sustainable places that focus on delivering placemaking and ensuring that Monmouthshire's communities are sustainable in the long-term and are attractive places to live, work and visit.

Sustainable Placemaking & High Quality Design

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. In order to achieve this, development shall:

- 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 to minimise the need to travel and to maximise opportunities for active travel and public transport use;**
- 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.**

- 5.5 Monmouthshire is renowned for its distinctive identity and the high quality of its natural, historic and built environments. It is intended to protect and enhance the quality of the County's settlements 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 will seek to achieve this by ensuring new development incorporates the principles of sustainable placemaking and good design.
- 5.6 The RLDP strategy and policies will 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.

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 11 (WG, February 2021)	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
Building Better Places (WG, July 2020)	Priorities and Actions for Places – post Covid-19 considerations: Considering Health and Well-being throughout the Planning Process (page 12) Staying local: creating neighbourhoods (Page 14) Active travel: exercise and rediscovered transport methods (Page 16) Revitalising our town centres (Page 18) Changing working practices – our future need for employment land (Page 20) Reawakening Wales’ tourism and cultural sectors (Page 21) Green Infrastructure, health and well-being and ecological resilience (Page 22) Improving air quality and soundscapes for better health and well-being (Page 23)
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

Monmouthshire PSB Well-being Plan (MWBP) (February 2018)	<ul style="list-style-type: none"> • Provide children and young people with the best possible start in life. • Respond to the challenges associated with demographic change. • Protect and enhance the resilience of our natural environment whilst mitigating and adapting to the impact of climate change. • Develop opportunities for communities and businesses to be part of an economically thriving and well-connected county.
Monmouthshire draft Community and Corporate Plan 2022 2023	<p>This policy supports the draft Community and Corporate Plan goals of ensuring Monmouthshire is a:</p> <ul style="list-style-type: none"> • 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	TAN 12 Design
Monitoring	TBC
Detailed Policies	TBC in Deposit RLDP

Climate Change

Strategic Policy S4 – Climate Change
<p>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:</p> <ul style="list-style-type: none"> 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 Urban Drainage Systems and flood resilient design; ii) Incorporating low/zero carbon energy requirements by reducing energy demand and promoting energy efficiency; iii) Supporting the development of renewable and low/zero carbon energy generation 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; 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 active travel and public transport use;**
- vii) **Providing ultra-low emission vehicle 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.**

Detailed targets and measures will follow in the Deposit RLDP policies and site allocations.

- 5.7 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 PPW11, 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 the sustainability of new developments whilst also tackling climate change. The RLDP will provide a positive planning policy framework to support and enable this approach to support climate change and decarbonisation.
- 5.8 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. More recently, this has broadened to incorporate a strengthened emphasis on nature recovery in recognition of the nature emergency and the relationship between the two. The Climate and Decarbonisation Strategy and Action Plan³² accompanying the declaration were approved by the Council in October 2019 and updated in November 2021, setting out the broad objectives and actions that the Council will seek to implement to deliver a net reduction in its own carbon emissions to net zero by 2030 and address water quality issues in the County. 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.

³² The Climate Emergency Strategy and Action Plan can be viewed via: <https://www.monmouthshire.gov.uk/climate-emergency/>

- 5.9 Policy S4 builds on a number of these actions 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. The Council’s Climate Emergency agenda will continue to be monitored and given further consideration in the Deposit RLDP.
- 5.10 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.
- 5.11 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. An updated version of TAN 15: Development, Flooding and Coastal Erosion was published on 28th September 2021 with the intention of it coming into effect on 1st December 2021. Formal publication has, however, been suspended until 1st June 2023 for Development Management decisions. In the meantime, however, the updated TAN15 remains the policy basis for the preparation of the RLDP. A further consultation is anticipated during 2022 in advance of formal publication in June 2023; the outcome of which will be taken into consideration as the Plan progresses. The approach of the Plan will be to locate vulnerable development away from flood risk areas, to assess the implications of development in areas at risk of flooding and to ensure that development does not increase the risk of flooding elsewhere.
- 5.12 In accordance with the updated TAN15, 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 will be used to help inform the identification of areas most suitable for development and support the identification and safeguarding of areas suitable for sustainable and natural flood management.
- 5.13 The use of sustainable drainage systems (SuDs) must be an integral part of a development to reduce the potential impact of new development with respect to surface water drainage discharges. A separate regulatory framework, namely the

Sustainable Drainage Approving Body (SAB) is now in place to ensure this happens. The effective management of surface water drainage can mitigate the impact of development in terms of flooding, water efficiency and water quality.

- 5.14 The RLDP needs to ensure that new development incorporates the broader principles of sustainable design in order to significantly reduce energy usage and carbon emissions, such as making the best use of orientation and shading. The Plan will also support, where appropriate, renewable and low/zero carbon energy generation technology, subject to a range of material planning considerations. A Renewable and Low Carbon Energy Assessment³³ of the potential for renewable energy generation, using the Welsh Government Toolkit, has been undertaken by the Carbon Trust and will inform the Deposit Plan in terms of identifying specific areas of search for renewable energy generation and targets. The Deposit RLDP will include a policy to require all new developments to be net zero carbon ready.
- 5.15 alongside the proposed changes to Building Regulations being implemented in 2025, the details of which will be determined in the Deposit RLDP.
- 5.16 PPW11 promotes the principles of a circular economy whereby the use of material resources in the building industry is influenced by making the most appropriate and sustainable use of finite resources. Such an approach sources materials as locally as possible, makes best use of the resources available through design and construction techniques, and minimises waste by re-using materials on site wherever possible.
- 5.17 The sustainable provision and use of water resources is also an important consideration in terms of building climate change resilience. Developers will be required to use design approaches and techniques that improve water efficiency and minimise adverse impacts on water resources. Development proposals within the River Wye and River Usk phosphate sensitive catchment areas will have to satisfy NRW's planning guidance in relation to evidencing that the development can demonstrate phosphate neutrality and betterment in its design and and/or contribution to the water body.
- 5.18 Development proposals will be expected to make full and appropriate use of land, while balancing density with placemaking, with preference given to the development of previously development land, although it is recognised that there are limited opportunities for further significant brownfield development in Monmouthshire. The potential impacts of climate change should be central to the design process, including the contribution that location, density, layout, built form and mix of uses can make towards climate responsive developments. The RLDP categorises settlements into a hierarchy which reflects their relative sustainability and will be a guiding policy in

³³ The Renewable and Low carbon Energy Assessment (October 2020) can be viewed via the following link: <https://www.monmouthshire.gov.uk/app/uploads/2021/12/RLCEA-MCC-Report-Body-Version-1-1.pdf>

terms of a site's ability to accommodate development. The Plan will direct development to the most sustainable locations, following the travel hierarchy set out in *Llwybr Newydd* of reducing the need to travel and achieving modal shift. The increase in home and remote working as a result of the Covid-19 pandemic can be supported over the longer term, for example by providing local shared work spaces. Combined with enhanced sustainable transport opportunities such as active travel networks, improved public transport and electric vehicle charging point infrastructure, the impact of transport-based emissions can be reduced resulting in improvements in air quality.

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 11 (WG, February 2021)	Productive and Enterprising Places Theme (Chapter 5) Distinctive and Natural Places Theme (Chapter 6)
Building Better Places (WG, July 2020)	Priorities and Actions for Places – post Covid-19 considerations: Climate Change and Decarbonisation (Page 11) Staying local: creating neighbourhoods (Page 14) Green Infrastructure, health and well-being and ecological resilience (Page 22) Improving air quality and soundscapes for better health and well-being (Page 23)
Well-being of Future Generations Act (WBFGA) (WG, 2015)	A resilient Wales A healthier Wales A globally responsible Wales
Monmouthshire PSB Well-being Plan (MWBP) (February 2018)	<ul style="list-style-type: none"> • Provide children and young people with the best possible start in life. • Respond to the challenges associated with demographic change. • Protect and enhance the resilience of our natural environment whilst mitigating and adapting to the impact of climate change.

	<ul style="list-style-type: none"> • Develop opportunities for communities and businesses to be part of an economically thriving and well-connected county.
Monmouthshire draft Community and Corporate Plan 2022 2023	This policy supports the draft Community and Corporate Plan goal of ensuring Monmouthshire is a green place to live and work with reduced carbon emissions, making a positive contribution to addressing the climate and nature emergency.
Key Evidence	<p>TAN 8: Planning for Renewable Energy (2005)</p> <p>TAN 12: Design</p> <p>TAN 15: Development and Flood Risk (2004)</p> <p>Development Advice Maps (TAN 15)</p> <p>Practice Guidance – Planning for Sustainable Buildings (WG, 2014).</p> <p>Renewable and Low Carbon Energy Assessment for Monmouthshire County Council – October 2020</p> <p>To follow in the Deposit:</p> <p>Renewable Energy Assessment (using the Welsh Government Toolkit. Renewable Energy & Energy Efficiency Supplementary Planning Guidance - March 2016)</p> <p>Strategic Flood Consequence Assessment in preparation</p>
Monitoring	TBC
Detailed Policies	TBC in Deposit RLDP

Infrastructure Provision

Strategic Policy S5 – Infrastructure Provision
<p>Where existing infrastructure is inadequate to serve the proposed development, new or improved infrastructure and facilities to remedy deficiencies must be provided as part of the proposed development. 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.</p> <p>Arrangements will be required towards the future management and maintenance of facilities provided, either in the form of initial support or in perpetuity.</p> <p>Planning 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. Such obligations may include:</p> <ul style="list-style-type: none"> • Affordable Housing Provision

- **Education Facilities**
- **Active Travel**
- **Sustainable Transport Measures**
- **Transport Infrastructure**
- **Recreation and Leisure Facilities including formal and informal open space**
- **Green Infrastructure**
- **Community and Cultural Facilities**
- **Ecological Mitigation and Enhancement**
- **Strategic utilities including; water and sewerage infrastructure**
- **Waste management facilities**
- **Health infrastructure**

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 housing developments, priority will be given to the affordable housing required by Policy S6 unless there is an overwhelming need for the available contribution, in whole or in part, to be allocated for some other necessary purpose/s.

- 5.19 The RLDP recognises the need to ensure that appropriate infrastructure is already in place or can be provided to accommodate the level of growth identified and is reflected in the spatial strategy. 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.
- 5.20 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.
 - Community infrastructure such as schools, healthcare, transport services (including public transport), community buildings, community recycling facilities, sport and recreation facilities, open space, etc.
 - Green Infrastructure (as detailed in Strategic Policy S17)
- 5.21 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 S5.

- 5.22 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.
- 5.23 This policy 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, or via a Community Infrastructure Levy. A decision on which tool best delivers the required infrastructure will be made as the RLDP progresses and the infrastructure needs are fully known. 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. In line with Community Infrastructure Levy Regulations 2010 (as amended), 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 PPW11 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.
- 5.24 An Infrastructure Plan will be prepared to accompany the Deposit RLDP, which will identify the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of allocated sites.
- 5.25 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. Where it is considered necessary to independently assess viability assessments, the costs will be borne by the developer.

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 11 (WG, February 2021)	Strategic and Spatial Choices Theme (Chapter 3) – Supporting Infrastructure
Building Better Places (WG, July 2020)	Priorities and Actions for Places – post Covid-19 considerations: Climate Change and Decarbonisation (page 11) Staying local: creating neighbourhoods (page 14) Active travel- exercise and rediscovered transport methods (page 16) Digital places – the lockdown lifeline (pages 19-20) Green infrastructure, health and well-being and ecological resilience (page 22)
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
Monmouthshire PSB Well-being Plan (MWBP) (February 2018)	<ul style="list-style-type: none"> • Provide children and young people with the best possible start in life. • Respond to the challenges associated with demographic change. • Protect and enhance the resilience of our natural environment whilst mitigating and adapting to the impact of climate change. • Develop opportunities for communities and businesses to be part of an economically thriving and well-connected county.
Monmouthshire draft Community and Corporate Plan 2022-2023	This policy supports the draft Community and Corporate Plan goals of ensuring Monmouthshire is a: <ul style="list-style-type: none"> • fair place to live where the effects of inequality and poverty have been reduced;

	<ul style="list-style-type: none"> • 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; • learning place where everybody has the opportunity to reach their potential.
Key Evidence	Infrastructure Plan to follow alongside Deposit RLDP Viability Assessments for Allocations in time for the Deposit RLDP
Monitoring	TBC
Detailed Policies	TBC in Deposit RLDP

ACTIVE & SOCIAL PLACES

- 5.26 The Active & Social Places theme aims to create well-connected and cohesive communities. The Strategic Policies contained within this section seek to deliver well connected, active and healthy communities that have access to good quality homes, services and community facilities.

Affordable Homes

Strategic Policy S6 – Affordable Homes
<p>The affordable homes target for the Plan period of 2018 – 2033 is 1,580 – 1,850 1,910 homes.</p> <p>The Council is committed to ensuring the delivery of 50% affordable homes on all new site allocations.</p> <p>Further detail relating to affordable housing thresholds will be included in the Deposit RLDP to reflect the outcomes of the emerging viability work.</p>

- 5.27 Policy S6 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. A core Council objective is to deliver much needed affordable homes at pace and scale to

help address inequality and rebalancing the County’s demography to ensure communities are socially and economically sustainable. The Council is committed to ensuring new site allocations provide for 50% affordable housing.

5.28 The Covid-19 pandemic increased the need for affordable homes and revealed the extent of hidden homelessness in the County. The Minister for Housing and Local Government announced that post-Covid-19, no-one should return to the streets.

Affordable Housing Target

5.29 The delivery of affordable homes across the County that seeks to address these issues is a key aim of the Preferred Strategy, 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 sufficient, good quality, affordable homes to meet a range of needs.

5.30 The latest Local Housing Market Assessment (LHMA) (December 2020) identifies an annual shortfall of 468 dwellings for the 5-year period 2020-2025 for the affordable housing tenures of low cost home ownership, intermediate rent and social rent. This would represent an affordable housing requirement of 7,017 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 housing. However, as set out in Section 4 and 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.

5.31 The RLDP will contain detailed policies setting out thresholds at which development will be required to provide affordable housing. An Affordable Housing Viability Study will be undertaken to inform the appropriate thresholds set out in the Deposit RLDP.

5.32 Detail relating to the required tenure split will be included in the Deposit RLDP based on the most up to date information contained in the LHMA.

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 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 11 (WG, February 2021)	Active & Social Places Theme (Chapter 4)
Building Better Places (WG, July 2020)	Priorities and Actions for Places - Post Covid-19 Considerations: Staying local: creating neighbourhoods (Page 14)
Well-being of Future Generations Act (WBFGA) (WG, 2015)	A More Equal Wales A Resilient Wales A Wales of Cohesive Communities
Monmouthshire PSB Well-being Plan (MWBWP) (February 2018)	<ul style="list-style-type: none"> • Provide children and young people with the best possible start in life. • Respond to the challenges associated with demographic change. • Develop opportunities for communities and businesses to be part of an economically thriving and well-connected county.
Monmouthshire draft Community and Corporate Plan 2022 2023	This policy supports the draft Community and Corporate Plan goals of ensuring Monmouthshire is a fair place to live, where the effects of inequality and poverty have been reduced, and a safe place to live where people have a home they feel secure in.
Key Evidence	Updating the RLDP Demographic Evidence Report, Edge Analytics November 2021 Housing Background Paper – December 2022 to be updated to accompany the Deposit Plan Monmouthshire Local Housing Market Assessment – December 2020 Affordable Housing Viability Assessment – to be undertaken for the Deposit RLDP.
Monitoring	TBC
Detailed Policies	TBC in Deposit RLDP

Preferred Strategic Site Allocations

Strategic Policy S7 – Preferred Strategic Site Allocations

Strategic Sites will be allocated to contribute to the delivery of the housing and job growth rates set out in Policy S1. The following sites are identified as Preferred Strategic Site Allocations:

- a) Abergavenny East
- b) ~~Bayfield, Chepstow~~ Mounton Road, Chepstow
- c) Leasbrook, Monmouth
- d) Caldicot East

- 5.33 In order to implement the RLDP's Strategy, Preferred Strategic Site Allocations have been identified for the Primary Settlements of Abergavenny, Chepstow, Monmouth and Caldicot. These sites 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 Preferred Strategy. Site selection has been informed by the consultation responses received on the 2021 Preferred Strategy and the December 2022 Preferred Strategy. To inform these Preferred Strategic Site Allocations, a high-level assessment has been undertaken to identify those sites which could contribute to delivering the level of growth (housing and jobs) required to deliver the Preferred Strategy. These sites have provided sufficient evidence of viability and deliverability that will be built on as the plan progresses. Two of the sites namely, Abergavenny East and Caldicot East, are anticipated to provide housing both within and beyond the RLDP plan period.
- 5.34 Policy S7 relates only to Preferred Strategic Site Allocations, additional sites are required to fulfil the housing requirement set out in the Strategy and these will be identified in the Deposit Plan. The final selection of sites for the Deposit Plan will be dependent on further detailed assessment work.
- 5.35 Details of the Preferred Strategic Site Allocations are provided in Figures 3 to 5 6 and Tables 3 to 5 6. Further details are set out in Appendix 5.
- 5.36 Planning Policy Wales emphasises the importance of re-using brownfield sites, however, there are limited opportunities for further significant brownfield development in Monmouthshire. The objective is to achieve sustainably located urban extensions that can be well-connected to town centres and public transport. The RLDP will seek to allocate those sites that are the best connected, most sustainable, best deliver placemaking and are least harmful, which will require balanced consideration and trade-offs at Deposit Plan stage. The same approach has been taken in identifying the Preferred Strategic Site Allocation for each primary settlement.

5.37 Following the consultation on the Preferred Strategy the Council will undertake a detailed assessment of all sites to ensure delivery of the Plan's Strategy, including the provision of:

- 50% affordable homes;
- Net zero carbon ready homes;
- Necessary supporting infrastructure;
- A masterplanning process to ensure allocations create sustainable, cohesive, well-designed places delivered through a strong placemaking approach; and
- A financial viability assessment to ensure sites are deliverable within the Plan period.

Abergavenny

Figure 3: Abergavenny East

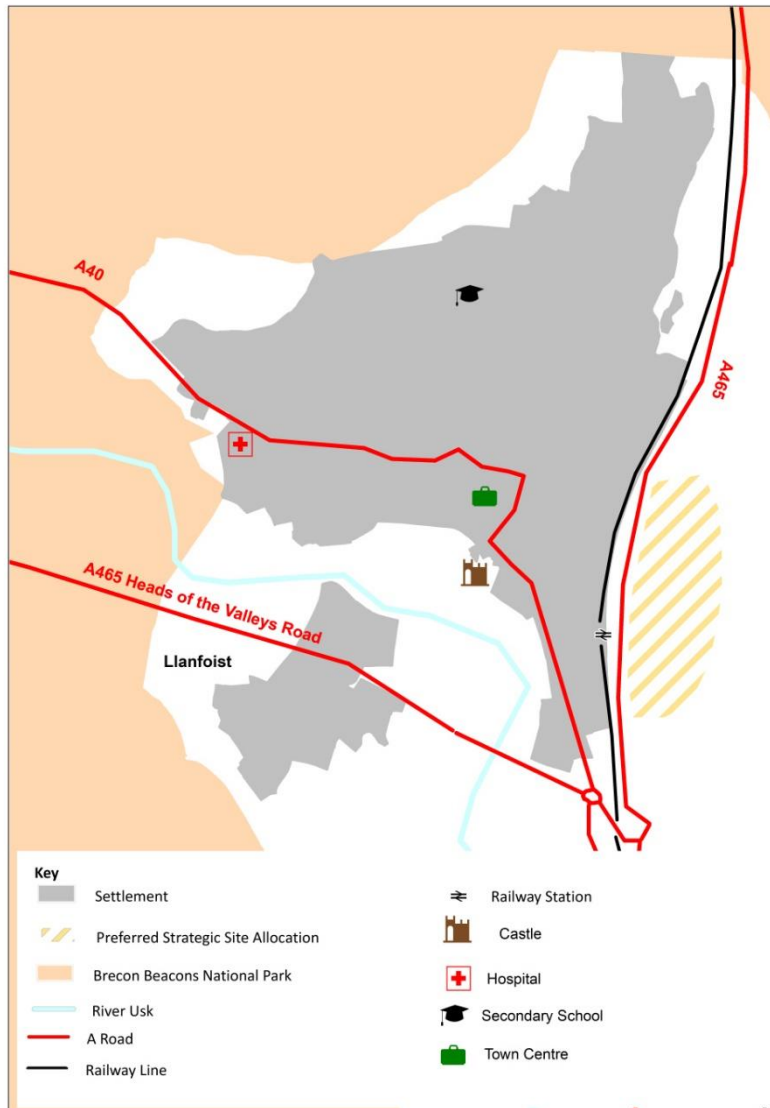


Table 3: Abergavenny East Site Details

Site Name	Size (Ha)	CS Ref	Proposed Use	Approximate No. of homes within Plan period
Abergavenny East	24.75	CS0213	Mixed Use: Residential, Employment, Retail, Leisure, Education and Community Use	500

Chepstow

Figure 4: Bayfield Mounton Road, Chepstow

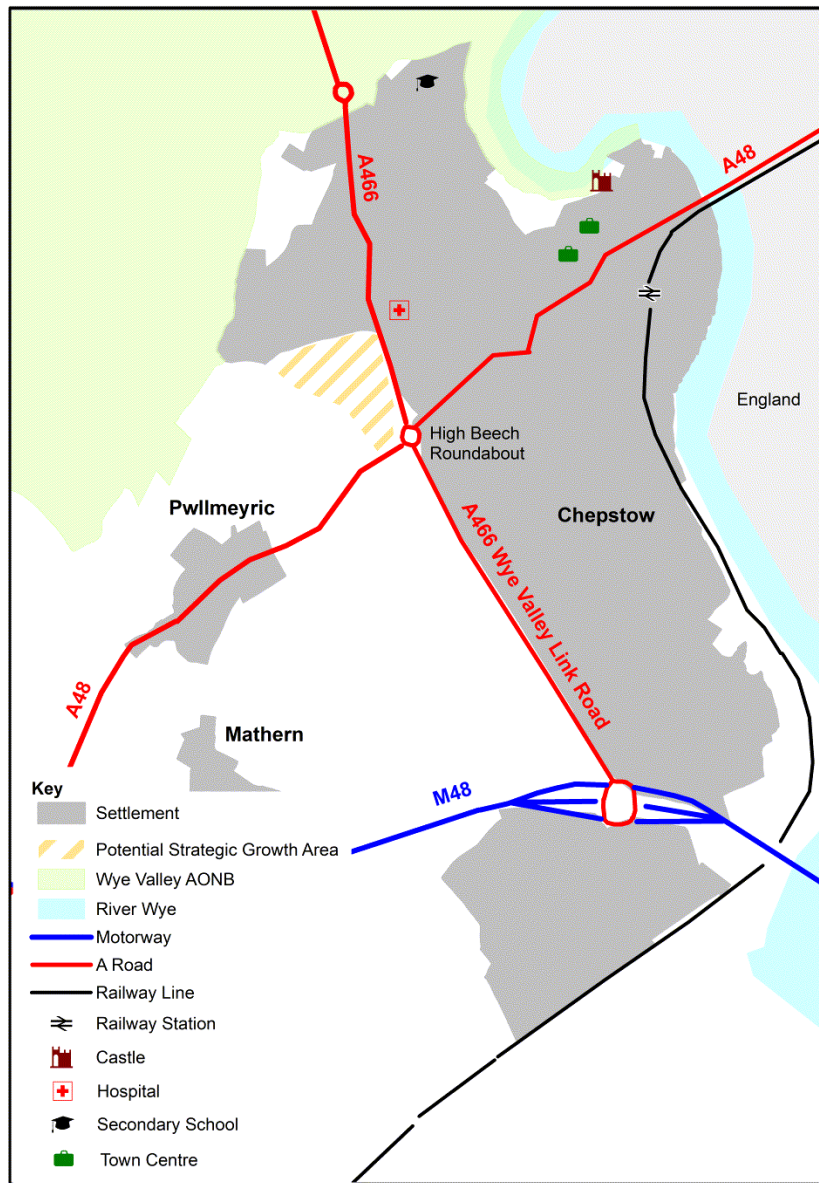


Table 4: Bayfield, Mounton Road, Chepstow Site Details

Site Name	Size (Ha)	CS Ref	Proposed Use	Approximate No. of homes within Plan period
Bayfield, Chepstow	10.07	CS0098	Residential	145
Mounton Road, Chepstow	12.8	CS0165	Mixed Use: Residential and commercial uses	145

Monmouth

Figure 5: Leasbrook, Monmouth

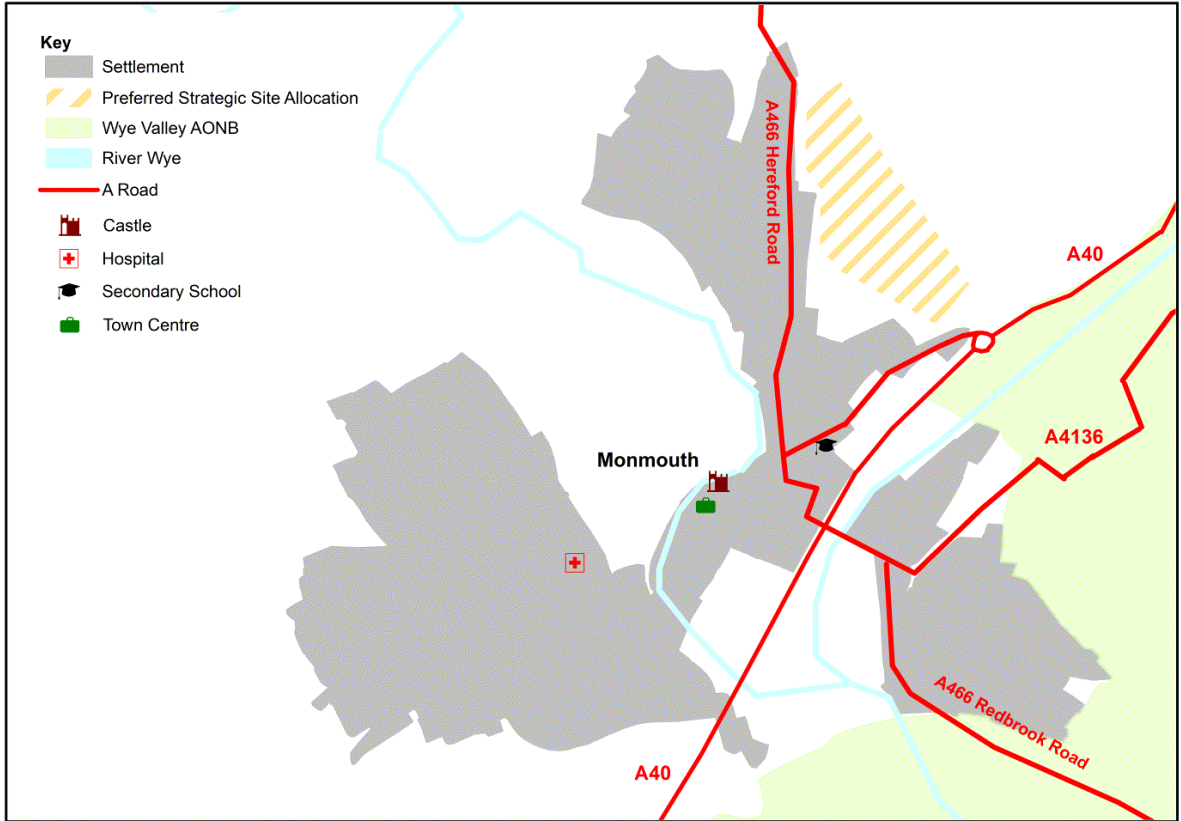


Table 5: Leasbrook, Monmouth Site Details

Site Name	Size (Ha)	CS Ref	Proposed Use	Approximate No. of homes within Plan period
Leasbrook, Monmouth	12.5	CS0270	Residential	270

Severnside

Figure 56: Caldicot East

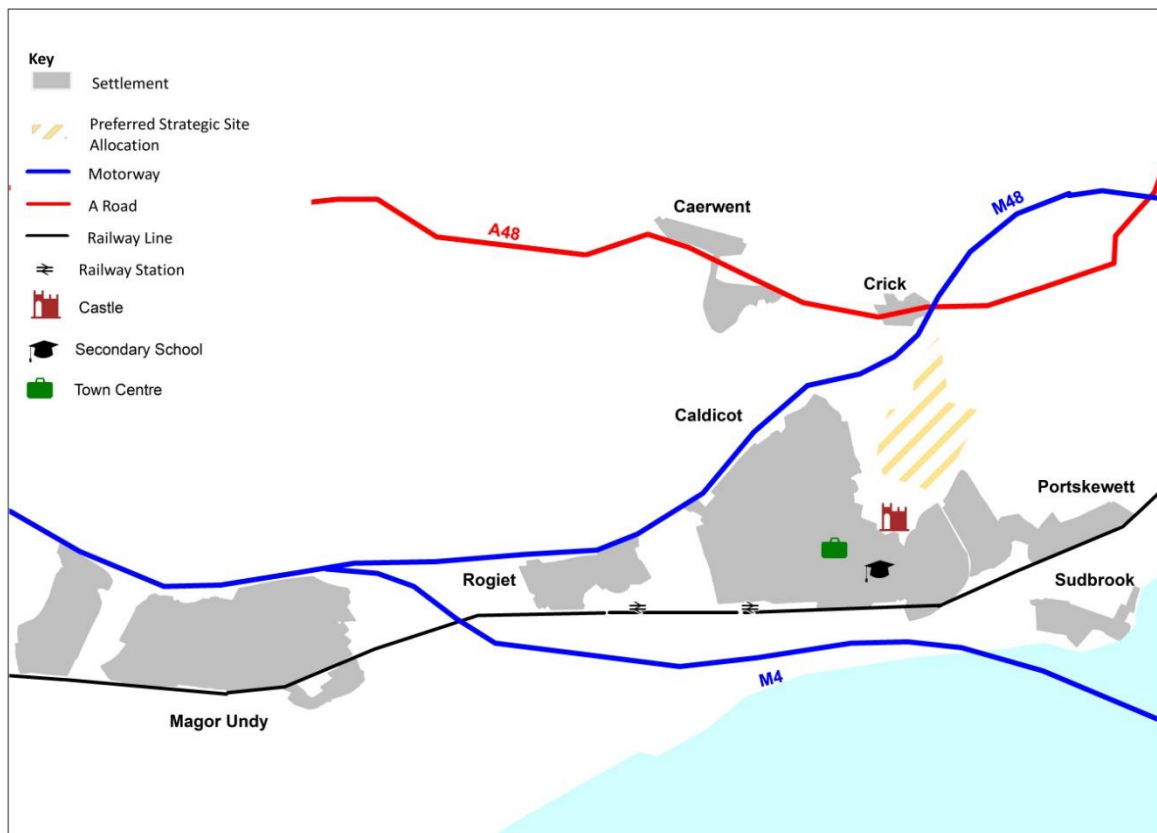


Table 56: Caldicot East Site Details

Site Name	Size (Ha)	CS Ref/s	Proposed Use	Approximate No. of homes within Plan period
Caldicot East	67.67 94.57	CS0087 CS0251	Mixed Use: Residential, Employment, Retail, Leisure	925 735

Links to Wider Policy Framework	
RLDP Objectives	Objective 1 – Economic Growth / Employment Objective 6 – Land Objective 9 – Demography Objective 10 – Housing Objective 11 – Placemaking 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 3 – Supporting Urban Growth and Regeneration – Public Sector Leadership Policy 4 – Supporting Rural Communities Policy 5 – Supporting the Rural Economy Policy 34 – Green Belts in the South East
Planning Policy Wales Edition 11 (WG, 2021)	Strategic and Spatial Choices Theme (Chapter 3) - Spatial Strategy and Site Search Sequence
Building Better Places (WG, July 2020)	Priorities and Actions for Places - Post Covid-19 Considerations: Staying local: creating neighbourhoods (page 14) Active Travel: exercise and rediscovered transport methods (page 16) Changing working practices: our future need for employment land (page 20)
Well-being of Future Generations Act (WBFGA) (WG, 2015)	A prosperous Wales A resilient Wales A more equal Wales A Wales of cohesive communities
Monmouthshire PSB Well-being Plan (MWBP) (February 2018)	<ul style="list-style-type: none"> • Provide children and young people with the best possible start in life. • Respond to the challenges associated with demographic change. • Protect and enhance the resilience of our natural environment whilst mitigating and adapting to the impact of climate change. • Develop opportunities for communities and businesses to be part of an economically thriving and well-connected county.
Monmouthshire draft Community and Corporate Plan 2022 2023	<p>This policy supports the draft Community and Corporate Plan goals of ensuring Monmouthshire is a:</p> <ul style="list-style-type: none"> • 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; • connected place where people feel part of a community, are valued and connected to other.

Key Evidence	Sustainable Settlement Appraisal – November 2022 Candidate Sites High-Level Assessment – September 2022 Growth and Spatial Options Background Paper – September 2022 Housing Background Paper – December 2022 to be updated to accompany the Deposit Plan
Monitoring	TBC
Detailed Policies	TBC in Deposit RLDP

Gypsy and Travellers

Strategic Policy S8 – Gypsy and Travellers

Land will be made available to accommodate unmet Gypsy and Traveller accommodation needs identified in the latest Gypsy and Traveller Accommodation Assessment.

- 5.38 The Housing Act requires the Assessments be updated every five years. An updated Gypsy and Travellers Needs Assessment has been prepared and was submitted to Welsh Government for approval in January 2021. This identified 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 13 pitches until the end of Plan period. The update did not identify a need for a transit pitch. Land will be identified to accommodate unmet Gypsy and Traveller accommodation need in the Deposit Plan.
- 5.39 In terms of transit sites, it is considered that these would be best considered on a regional basis, requiring collaboration with neighbouring local authorities through the SDP process.
- 5.40 Specific criteria-based policies to assess proposals for Gypsy and Traveller accommodation that come forward during the Plan period will be considered within the Deposit RLDP.

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 11 (WG, February 2021)	Active and Social Places Theme (Chapter 4) - Gypsies and Travellers
Building Better Places (WG (July 2020)	Priorities and Actions for Places - Post Covid-19 Considerations: Staying local: creating neighbourhoods (page 14)
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
Monmouthshire PSB Well-being Plan (MWBP) (February 2018)	<ul style="list-style-type: none"> • Provide children and young people with the best possible start in life. • Respond to the challenges associated with demographic change.
Monmouthshire draft Community and Corporate Plan 2022 2023	<p>This policy supports the draft Community and Corporate Plan goals of ensuring Monmouthshire is a:</p> <ul style="list-style-type: none"> • 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	<p>Gypsy and Travellers Accommodation Assessment – May 2016 Draft Gypsy and Travellers Accommodation Assessment – 2020 – 2025 (January 2021) – submitted to Welsh Government for approval in January 2021 (currently awaiting a response from WG).</p> <p>Housing (Wales) Act 2014 Welsh Government Circular 005/2018: Planning for Gypsy, Traveller and Showpeople Sites TAN 6: Planning Sustainable Rural Communities (2010)</p>
Monitoring	TBC
Detailed Policies	TBC in Deposit RLDP

Sustainable Transport

Strategic Policy S9 – Sustainable Transport

Development proposals must promote sustainable, low carbon, safe forms of transport which reduce the need to travel by car, increase provision for walking and cycling and improve public transport (rail and bus) provision in order to deliver significant health and well-being benefits through an increase in human physical activity, and environmental benefits through reduction of transport related air and noise pollution. This will be facilitated by:

- **Development that accords with the Sustainable Transport Hierarchy (as set out in PPW, Future Wales and Llwybr Newydd) of reducing the need to travel by car, and promoting walking, cycling public transport and Ultra Low Emission Vehicles (ULEVs) above private motor vehicles;**
- **Promoting digital and innovative infrastructure in both urban and rural areas to enable remote working and reduction in a need to travel to the workplace on a day-by-day basis;**
- **Promoting Active Travel (walking and cycling) connectivity through safeguarding, enhancing and expanding on the Active Travel Network Maps (ATNMs);**
- **Locating development close to public transport facilities and designing developments to facilitate and improve public transport infrastructure, its connections and geographical reach to rural areas;**
- **Ensuring developments incorporate and/or enable the use of ULEVs by providing the necessary underlying infrastructure;**
- **Improving travel infrastructure safety;**
- **Ensuring developments are served by an appropriate level of parking provision depending on the nature and location of the proposal;**
- **Developing the role of Monmouthshire’s Primary Settlements in accordance with the South East Wales Regional Plan and Monmouthshire’s Local Transport Plan (LTP) around which low carbon sustainable transport opportunities can be developed and linked to the South East Wales Metro, and;**
- **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.**

The Deposit Plan will safeguard sites necessary to deliver the key transport measures and schemes identified in National, Regional and Local Transport Plans.

5.41 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’ which sets out priorities of:

- Improving physical and digital connectivity to support remote working and reduce the need for people to use their cars on a daily basis. This is in line with the wider Welsh Government target of 30% of the workforce to work remotely on a regular basis.³⁴

³⁴ Smarter Working: a Remote Working Strategy for Wales, Welsh Government (2022)

- Investment in low carbon, accessible and efficient transport infrastructure that enable more people to walk and cycle, encouraging more sustainable and healthy lifestyles.
- ‘Future proof’ transport infrastructure to adapt to climate change and give priority to the ‘Sustainable Transport Hierarchy’ set out in PPW11, which puts walking, cycling and public transport infrastructure above the private car. Where private cars are to be used there needs to be a move away from petrol and diesel vehicles to Ultra-Low Emissions Vehicles (ULEVs).

5.42 The spatial strategy of the RLDP focuses development in our most sustainable settlements of Abergavenny, Chepstow and Caldicot, including Severnside, that provide opportunities for a reduction in travel and provide opportunities for sustainable transport, particularly walking, cycling (Active Travel) and public transport. In line with the Active Travel Act 2013 and Welsh Government Travel Act Guidance (2021)³⁵, the Council has produced Active Travel Network Maps (ATMNs)³⁶, identifying the walking and cycling routes required to create fully integrated networks for walking and cycling.

5.43 The RLDP will promote the concept of the ‘20 minute neighbourhood’³⁷ whereby new development should be within a 20 minute walking distance of key everyday services, which in turn will promote physical activity and the health and well-being of our residents. The RLDP will also establish the foundations to encourage longer term changes to the historic high level of car usage in Monmouthshire and promote modal shift as per Llwybr Newydd. Site allocations will be sustainably located and well connected to encourage active travel and public transport use. Policies will ensure that new developments provide the charging infrastructure required to support a move to ULEVs away from petrol and diesel vehicles, such as reducing parking spaces in sustainable locations.

Rural Transport

5.44 Monmouthshire is predominantly a rural County and as set out in Future Wales Policy 5, and it is recognised there are significant disparities between urban areas with regard to the feasibility of delivering effective and public transport systems and active travel routes. ‘A rural location within the proximity of major urban areas experiences different issues compared with a more isolated rural location. It may not be

³⁵ Welsh Government Active Travel Act Guidance (July 2021)

<https://gov.wales/sites/default/files/publications/2022-01/active-travel-act-guidance.pdf>

³⁶ Monmouthshire’s Active Travel Network Maps can be viewed via

<https://maps.monmouthshire.gov.uk/custom/activetravelATNM.html>

³⁷ Future Generations Commissioner for Wales (2020) Climate Week: How 20-minute neighbourhoods can help us fight the Climate Emergency and save our towns and cities

[Climate Week: How 20-minute neighbourhoods can help us fight the Climate Emergency and save our towns and cities – The Future Generations Commissioner for Wales](#)

appropriate for policies to be applied to both types of location equally.³⁸ Travel by the car in some rural areas of Monmouthshire therefore may be the only realistic mode of travel.

- 5.45 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, and trip reduction through car sharing schemes and creation of ‘local distribution networks’ hubs to help manage the impacts of increasing home deliveries.³⁹ Development proposals in rural areas of Monmouthshire should therefore demonstrate innovative solutions to connect rural locations to services and facilities.

Regional Planning

- 5.46 Monmouthshire is part of the South East 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 a ‘Network of Alternatives’ to solve congestion and travel reliance on the M4 travel route,⁴⁰ which sets out public transport 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 rail station and access arrangements, and development of a walkway station at Magor with Undy. 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”⁴¹ and that the local planning policy frameworks must ensure that long term strategic decisions maximise opportunities in areas that will benefit from the Metro.
- 5.47 The RLDP will therefore plan for strategic development within 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 preferred

³⁸ Future Wales 2040: Policy 5: Supporting the rural economy [Update to Future Wales - The National Plan 2040 \(gov.wales\)](#)

³⁹ Living Locally in rural Wales: RTPi Cymru 2022 explores the role the planning system can play in supporting more sustainable local living in rural Wales [Plan The World We Need \(rtpi.org.uk\)](#)

⁴⁰ South East Wales Transport Commission Final Recommendations <https://gov.wales/sites/default/files/publications/2020-11/south-east-wales-transport-commission-final-recommendations.pdf>

⁴¹ Future Wales 2040 Policy 36: South East Metro [Update to Future Wales - The National Plan 2040 \(gov.wales\)](#)

strategic growth areas of Abergavenny East, Bayfield, and Caldicot East will be linked to the town centre and railway stations via active travel connections.

Monmouthshire Local Transport Plan

5.48 The RLDP will also be accompanied by a Local Transport Plan (LTP)⁴² which will highlight several different transport measures Monmouthshire will hope to undertake to facilitate proposed development set out in the RLDP. The programmes outlined in the current LTP includes walking and cycling infrastructure, bus network, station and highways improvements, Cardiff Capital Region Metro schemes, 20mph limits and road safety schemes. The LTP is being updated and will inform the Deposit Plan. The RLDP will support the transport schemes identified within the Monmouthshire updated LTP and, where appropriate, safeguard land for key transport proposals such as the Magor Walkway Station and Severn Tunnel Junction link road and public transport interchange.

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 (W G, February 2021)	Policy 11 – National Connectivity Policy 12 – Regional Connectivity Policy 36 – South East Metro
Planning Policy Wales Edition 11 (WG, February 2021)	Active and Social Places Theme (Chapter 4) - Moving within and between places
Building Better Places (WG, July 2020)	Priorities and Actions for Places - Post Covid-19 Considerations: Staying local: creating neighbourhoods (page 14) Active travel: exercise and rediscovered transport methods (page 16)

⁴² Monmouthshire Local Transport Plan – May 2015 can be viewed via <https://www.monmouthshire.gov.uk/local-transport-plan/>

Well-being of Future Generations Act (WBFGA) (WG 2015)	<p>A prosperous Wales</p> <p>A resilient Wales</p> <p>A more equal Wales</p> <p>A Wales of cohesive Communities</p>
Monmouthshire PSB Well-being Plan (MWBP) (February 2018)	<ul style="list-style-type: none"> • Provide children and young people with the best possible start in life. • Respond to the challenges associated with demographic change. • Protect and enhance the resilience of our natural environment whilst mitigating and adapting to the impact of climate change. • Develop opportunities for communities and businesses to be part of an economically thriving and well-connected county.
Monmouthshire draft Community and Corporate Plan 2022 2023	<p>This policy supports the draft Community and Corporate Plan goals of ensuring Monmouthshire is a:</p> <ul style="list-style-type: none"> • green place to live and work with reduced carbon emissions, making a positive contribution to addressing the climate and nature emergency; • connected place where people feel part of a community, are valued and connected to other.
Key Evidence	<ul style="list-style-type: none"> • Llwybr Newydd: The Wales Transport Strategy 2021 • Welsh Government Active Travel Act Guidance July 2021 • South East Wales Transport Commission: Final Recommendations: November 2020 • Monmouthshire Local Transport Plan and updated LTP to be prepared alongside the Deposit Plan. • ATNM's for Monmouthshire • Living Locally in Rural Wales: Planning policy and practice RTPI discussion paper 2022
Monitoring	TBC
Detailed Policies	TBC in Deposit RLDP

Town, Local and Neighbourhood Centres

Strategic Policy S10– Town, Local and Neighbourhood Centres

All new or enhanced retail, commercial and social developments, including leisure, cultural and entertainment uses, will be focussed according to 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

Local Centres: Magor, Raglan, Usk

Neighbourhood Centres: Abergavenny - Hillcrest Road, Rother Avenue,
(These will be reviewed as part of the Deposit RLDP) The Mardy
Caldicot – West End
Chepstow – Bulwark, Thornwell
Monmouth – Overmonnow, Wyesham, The Albion

- 5.49 PPW11 requires local planning authorities to identify a hierarchy of centres which distinguishes between higher order centres which 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 S10 sets out this hierarchy for Monmouthshire, although this will be given further consideration as part of the Retail Study which will inform the Deposit Plan.
- 5.50 The Primary Settlements of Abergavenny, Chepstow and Monmouth are akin to 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. While the town is not a major tourist destination, Caldicot is an important local attraction and the Council is promoting nearby tourist attractions such as Caldicot Castle and Country Park, Black Rock and the Gwent Levels.

- 5.51 The County's local centres – Magor, Raglan and Usk – also provide an important role in the hierarchy serving 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. Neighbourhood centres similarly provide an important local day-to-day function for their local communities.
- 5.52 The Monmouthshire Retail Expenditure Forecasts Update (2020)⁴³ notes that Monmouthshire's centres are performing relatively well as destinations for convenience trading, but less well as destinations for comparison shopping. Further information on the health and function of the town and local centres can also be found in the latest Retail Background Paper August 2022⁴⁴. The decline in the role of town centres as destinations for comparison goods shopping highlights the importance of attracting a diverse range of uses to commercial centres such as leisure and community uses. Given the changing role of commercial centres, the current Central Shopping Area and Primary Shopping Frontage boundaries will be reviewed in the Deposit RLDP and amended, if necessary, in recognition of the need for flexibility in maintaining occupancy and footfall and encouraging a mix of uses that will promote the overall health and vibrancy of the town centres. An update of Monmouthshire's Retail Expenditure Forecasts (2020) will also be undertaken to take account of the population growth levels established in the Preferred Strategy. If appropriate, land will be identified in the Deposit Plan for future retailing needs.
- 5.53 Given the essential role and function of these centres, it is important that a centre's position in the hierarchy is maintained and, where possible, enhanced. A key objective of the RLDP is to sustain and enhance the County's primary settlements as vibrant and attractive centres and to maintain the essential function of our other centres, by focusing new and enhanced retail, and commercial, including leisure, entertainment, cultural and community developments of an appropriate scale and nature, in designated centres. This is vital in ensuring that the centres remain attractive places to live and visit and provide a valuable role in meeting the needs of local communities and visitors.
- 5.54 Welsh Government's Building Better Places (July 2020) document recognises the economic consequences to town centres as a result of the recent pandemic. It tasks the planning system with responding to this by ensuring that town and local centres can operate as flexibly as possible. Whilst recognising the important role our town centres play, high streets will continue to change, and there is a clear need for flexible planning policies in our centres to enable a 're-imagining' of our high streets across the County. Increased agile/home working might also result in increased expenditure within our towns, with the community good-will encapsulated by the Covid-19

⁴³ Monmouthshire's Retail Expenditure Forecasts – 2020 can be viewed via <https://www.monmouthshire.gov.uk/planning-policy/development-of-an-evidence-base/>

⁴⁴ The Retail Background Paper – August 2022 can be viewed via <https://www.monmouthshire.gov.uk/planning-policy/annual-monitoring/retail/>

response helping to support local businesses and retailers. In light of these changes a need for greater flexibility will be reflected in the detailed planning policy framework which will be set out in the Deposit Plan.

- 5.55 Whilst recognising the need for greater flexibility, Welsh Government in Future Wales has adopted a ‘Town Centre First’ approach. This puts the health and vibrancy of town centres as the starting point of locational decision-making. It also directs facilities and services to where intended users can easily walk, cycle and/or use public transport to access them. Developments of an appropriate scale within our town and local centres that maintain and/or enhance their vitality, attractiveness and viability will be supported in the RLDP. The future size and scale of Town Centre development is critical to the maintenance of the character and function of the County’s settlements. It is therefore important that new developments are in keeping with the scale and function of the existing centres and have regard to their position within the overall hierarchy. Inappropriate development which would undermine the vitality, viability and attractiveness of the County’s town, local and neighbourhood centres, such as out of town retail, will be strongly resisted. Detailed policies will be set out in the Deposit RLDP providing further clarification on where development will and will not be permitted, and where change of use will be limited.
- 5.56 The County’s town, local and neighbourhood centres provide retail, employment, leisure, tourism and cultural opportunities. Tourism, in particular, plays an important part in sustaining Monmouthshire’s historic town centres of Abergavenny, Chepstow and Monmouth, as well as Usk. It is essential that the role and function of these settlements as important visitor destinations is maintained and enhanced over the Plan period. The co-location of retail, commercial and leisure and tourism facilities in these centres, where they can be accessed by public transport, walking and cycling, will help to sustain and enhance their vitality, viability and attractiveness and contribute to a reduction in travel demand.

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 11 (WG, February 2021)	Active and Social Places Theme (Chapter 4) - Retail and Commercial Development
Building Better Places (WG, July 2020)	Priorities and Actions for Places - Post Covid-19 Considerations: Staying local: creating neighbourhoods (Page 14) Active travel: exercise and rediscovered transport methods (Page 16) Revitalising our town centres (Page 18) Changing working practices – our future need for employment land (Page 20) Reawakening Wales’ tourism and cultural sectors (Page 21) Improving air quality and soundscapes for better health and well-being (Page 23)
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
Monmouthshire PSB Well-being Plan (MWBP) (February 2018)	<ul style="list-style-type: none"> • Provide children and young people with the best possible start in life. • Respond to the challenges associated with demographic change. • Develop opportunities for communities and businesses to be part of an economically thriving and well-connected county.
Monmouthshire draft Community and Corporate Plan 2022 2023	This policy supports the draft Community and Corporate Plan goals of ensuring Monmouthshire is a: <ul style="list-style-type: none"> • thriving and ambitious place, full of hope and enterprise; • connected place where people feel part of a community, are valued and connected to other.
Key Evidence	TAN 4: Retail & Commercial Development – Nov 2016 Review of Central Shopping Area and Primary Shopping Frontage boundaries – this will support the detailed boundaries defined in the Deposit LDP. Monmouthshire Retail Study will be prepared to inform the Deposit Plan. Retail Background Paper – August 2022 Primary Shopping Frontages SPG – April 2016
Monitoring	TBC
Detailed Policies	TBC in Deposit RLDP

Community & Recreation Facilities

Strategic Policy S11 – Community and Recreation Facilities

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. Development proposals that result in the unjustified loss of community and recreation facilities will not be permitted.

- 5.57 The Council is committed to protecting and enhancing community facilities to meet the needs of residents over the Plan period. 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 facilities they provide, the employment they generate and in attracting people to live within an area. As noted above, Future Wales advocates a ‘Town Centre First’ approach which puts the health and vibrancy of town centres as the starting point of locational decision making. It also directs facilities and services to where intended users can easily walk, cycle and/or use public transport to access them.
- 5.58 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 and shops, schools, GP surgeries / health centres, leisure centres, public houses, places of worship, cemeteries, allotments, community food growing and libraries. They can be owned by the public, private or community groups. Community facilities can be considered appropriate in residential and non-residential areas, where they satisfy the relevant 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. 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. The criteria against which proposals that involve the loss of community or recreation facilities will be assessed will be set out in Development Management policies in the Deposit Plan.
- 5.59 The recent Covid-19 pandemic has emphasised the importance of considering health and well-being throughout the planning system to ensure communities across Wales are healthy, vibrant and inclusive. Welsh Government’s Building Better Places (July 2020) document recognises that the planning system has an important role in supporting healthier lifestyles. 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 open space is essential in enhancing the quality of life for all and promoting sustainable and resilient communities for all. It can help foster social inclusion, assist healthier lifestyles and

allow for recreation and leisure activities. It is important that an accessible network of open space is maintained and improved.

- 5.60 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. Further details on recreation categories and standards will be provided in the Deposit Plan as well as the designation of land to be protected for such purposes. 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.
- 5.61 The provision of new community and recreation facilities and areas of open space and/or contributions towards improving existing areas of open space and recreation 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.

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 11 (WG, February 2021)	Active and Social Places Theme (Chapter 4) - Community Facilities Recreational Spaces
Building Better Places (WG, July 2020)	Priorities and Actions for Places - Post Covid-19 Considerations: Considering Health and Well-being throughout the Planning Process (page 12) Staying local: creating neighbourhoods (Page 14) Active travel: exercise and rediscovered transport methods (Page 16) Green Infrastructure, health and well-being and ecological resilience (Page 22)

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
Monmouthshire PSB Well-being Plan (MWBP) (February 2018)	<ul style="list-style-type: none"> • Provide children and young people with the best possible start in life. • Respond to the challenges associated with demographic change. • Develop opportunities for communities and businesses to be part of an economically thriving and well-connected county.
Monmouthshire draft Community and Corporate Plan 2022	This policy supports the draft Community and Corporate Plan goal of ensuring Monmouthshire is a connected place where people feel part of a community, are valued and connected to other.
Key Evidence	TAN 16: Sport, Recreation and Open Space Monmouthshire Amenity Open Space Audit to follow with the Deposit plan.
Monitoring	TBC
Detailed Policies	TBC in Deposit RLDP

PRODUCTIVE & ENTERPRISING PLACES

- 5.62 Economic growth and resilience are key priorities for Monmouthshire County Council driven by the need to address the shrinking working age population and the high levels of out-commuting the County experiences. In order to create sustainable and resilient communities, the Preferred Strategy identifies a level of growth that aims to provide an appropriate balance of household and jobs growth. The RLDP will seek to facilitate this growth by providing a policy framework that allows Monmouthshire to attract and retain investment, create jobs, improve strategic infrastructure through the identification of sufficient employment land for traditional employment uses (B use class) and the promotion of other employment generators important to Monmouthshire's economy. Job growth will also come via the growth and retention of existing Small Medium Enterprises (SMEs) and the formation of new ones, with supportive planning policies, marketing and other interventions as required to make this happen.

Employment Sites Provision

Strategic Policy S12 – Employment Sites Provision

Provision will be made for a minimum of 38 ha of land on a suitable range and choice of sites for industrial and business development (classes B1, B2 and B8 of the Town and Country Planning Use Classes Order 1987) 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.

To ensure that a range of types and sizes of employment land and premises is provided, development for the following will be permitted, subject to detailed planning considerations:

- Small units and workshops for small businesses throughout the County to assist in providing regeneration opportunities, enabling SMEs to start up and grow, and ensuring sustainable economic growth;**
- The integration of new employment opportunities in mixed-use developments.**

- 5.63 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 Preferred Strategy 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 Preferred Strategy provides the planning policy framework to enable the provision of 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.
- 5.64 Securing local economic growth and prosperity are 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 Economic Ambition Statement sets the Council’s direction of travel and the combination of measures required, including an Investment Prospectus, close engagement with the business sector, demonstrating a pro-business culture and land assembly interventions to ensure sites come forward. Policy interventions are also likely to be needed in terms of housing mix policies, to achieve the objective of retaining and attracting a younger demographic.

- 5.65 The RLDP has a key role in 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. As noted above, Monmouthshire’s priorities for economic growth are set out in the ‘Monmouthshire 2040: Our Economic Growth and Ambition Statement’ and accompanying Investment Prospectus. The statement reflects national and regional policies including the ambitions for the Cardiff Capital Region and the Council’s Corporate Plan and builds on the recommendations of the ‘Economies of the Future Reports’. As detailed in Section 2, the Statement sets out Monmouthshire’s economic priorities moving forward as being:
- A dynamic place to do business
 - A credible place to invest
 - An incredible place to live, visit and stay
- 5.66 Monmouthshire is geographically well connected, located in a key strategic location that benefits from good links to Cardiff, Bristol and the Midlands. With the recent 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 Great Western Cities and the Western Power House, which aim to drive economic growth through regional collaboration.
- 5.67 As noted in the Development Plans Manual (March 2020), the aim of a strategy is to achieve a balance between homes and jobs thereby reducing the need for commuting (paragraph 5.25). 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.
- 5.68 The benefits of this change extend beyond reducing traffic pollution and congestion: experience during the pandemic showed that people working from home spent their income locally rather than at their work-base. In many cases, despite the wider restrictions associated with the pandemic, local businesses in our market towns survived: Magor town centre is a particularly successful case study of increased local

spend. At present, data on the extent of continued home/local working is limited but factors such as the increased focus on quality of life and home environment and increasing fuel costs act as continuing levers to encourage behaviour change. The RLDP can support this by securing the provision of local shared working hubs, provision of broadband infrastructure and placemaking to ensure quality home environments.

- 5.69 In line with PPW and Building Better Places and the requirement to provide an economic development evidence base to support LDP preparation, the Council has commissioned the preparation of an Employment Land Review (ELR)⁴⁵. 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 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
- 5.70 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 in key growth sectors and enable our existing businesses to grow. Many of the County's businesses are SMEs and may not require new land allocations to grow.
- 5.71 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. The RLDP will provide a range of sites to meet employment needs to 2033 to support the Council's ambitions and to support the local economy, being flexible to future changes. Community-based remote working hubs support a hybrid way of working from home and remotely at a local hub, reducing the need to travel and supporting small and medium sized enterprises (SMEs) needs which are a key sector in the County. Having regard to the outcome of the evidence base set out above, the Deposit RLDP will allocate sufficient employment land (B use class) to cover the employment needs of the County in locations consistent with the Plan's spatial strategy. Details of employment land allocations and existing protected sites will be provided in the Deposit RLDP, along with criteria setting out the exceptional circumstances in which the loss of existing industrial and business sites or premises will be considered acceptable.

⁴⁵ Employment Land Review (BE Group, October 2022)

- 5.72 The ELR undertakes an assessment of the suitability and deliverability of existing LDP allocations, protected LDP employment sites along with Second Call Candidate Sites. The outcome of this work will inform the employment allocations made in the Deposit RLDP. Site allocations will also have regard to the spatial strategy and the restrictions on development in the upper River Wye Phosphates Catchment area. Site allocations and distribution will also have regard to the large existing employment allocation at Quay Point, Magor, which accounts for a significant mass of land of the available supply of employment land at one site (13.76ha). Further supply is recommended to meet the shortfall of supply and enable further flexibility in the market in terms of types of land and locations.
- 5.73 In accordance with PPW, the ELR sits alongside the Regional Employment Study⁴⁶, 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 within the region and recognises the important role the M4 corridor plays in the region as well as the strategic function of the north of the sub-region linking to Herefordshire and the west Midlands. Strategic employment should be geographically distributed throughout the region to support this. The findings of this Study will be considered as part of the Deposit RLDP along with the ELR.
- 5.74 It should be noted that not all 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 S10 – Town, Local and Neighbourhood Centres Hierarchy, S13 – Rural Enterprise and S14 – Visitor Economy.

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	Policy 4 – Supporting Rural Communities Policy 5 – Supporting the rural economy Policy 6 – Town Centre First

⁴⁶ Regional Employment Study: Larger Than Local (BE Group, March 2020)

Plan 2040 (WG, February 2021)	
Planning Policy Wales Edition 11 (WG, February 2021)	Productive and Enterprising Places Theme (Chapter 5) - Economic Development
Building Better Places (WG, July 2020)	Priorities and Actions for Places - Post Covid-19 Considerations: Staying local: creating neighbourhoods Revitalising our town centres Digital Places – the lockdown lifeline Changing working practices: our future need for employment land Reawakening Wales’ tourism and cultural sectors
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
Monmouthshire PSB Well-being Plan (MWBP) (February 2018)	<ul style="list-style-type: none"> • Respond to the challenges associated with demographic change • Develop opportunities for communities and businesses to be part of an economically thriving and well-connected county.
Monmouthshire draft Community and Corporate Plan 2022	This policy supports the draft Community and Corporate Plan goal of ensuring Monmouthshire is a thriving and ambitious place, full of hope and enterprise.
Key Evidence	<p>Monmouthshire 2040: Our Economic Growth and Ambition Statement (November 2019)</p> <p>Vision 2040: Growing Your Own Business Monmouthshire Inward Investment Prospectus (March 2020)</p> <p>Monmouthshire Employment Land Review (October 2022)</p> <p>Regional Employment Study – Larger than Local Study – Blaenau Gwent, Caerphilly, Torfaen, Monmouthshire and Newport (BE Group) (March 2020)</p> <p>Economies of the Future Analysis – Strategic Directions Report (October 2018)</p>
Monitoring	TBC
Detailed Policies	TBC in Deposit RLDP

Rural Enterprise

Strategic Policy S13 – Rural Enterprise

Development to enable rural enterprise uses and the diversification of the rural economy will be permitted outside settlement development 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 the settlement boundaries to support the rural economy will be set out in the Deposit RLDP.

- 5.75 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 ‘Monmouthshire 2040: Our Economic Growth and Ambition Statement’⁴⁷, which aims to continue to support and promote rural businesses and services. Building on the work of the EU funded Rural Development Programme⁴⁸, which ceased in September 2022, the Council has been successful in securing £2.04M funding as part of the UK Community Renewal Fund⁴⁹ which was launched by central government as a precursor to the UK Shared Prosperity Fund to replace EU funding sources. The Council has been awarded £7.16 million from the [Shared Prosperity Fund](#) over the next three years.
- 5.76 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.
- 5.77 National policy supports rural enterprise and agricultural diversification where it is environmentally acceptable. TAN 6: Planning for Sustainable Rural Communities (2010), advises that LDPs should facilitate the diversification of the rural economy by

⁴⁷ Monmouthshire 2040: Our Economic Growth and Ambition Statement can be viewed via: <https://www.monmouthshire.gov.uk/app/uploads/2020/03/Economic-Growth-and-Ambition-Statement-November-2019.pdf>

⁴⁸ Details of the Rural Development Programme – 2014 – 2020 can be viewed via Monmouthshire’s website at [Monmouthshire Business & Enterprise | Rural Innovation | Embracing innovation and enabling big things to happen in South Wales](#) and Welsh Government via <https://businesswales.gov.wales/walesruralnetwork/wrn-support-unit/rural-development-programme-funding>

⁴⁹ Details of the UK Community Fund and UK Shared Prosperity Fund can be viewed via <https://www.gov.uk/government/publications/uk-community-renewal-fund-prospectus/uk-community-renewal-fund-prospectus-2021-22>

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 and be located within or adjoining settlement boundaries and not have an unacceptable impact on the local community or environment. Detailed criteria for assessing rural enterprise will be set out in the Deposit Plan. Separate criteria apply to rural 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 rural enterprise by reducing their operating costs (5.6.13 – PPW11). The Deposit Plan will also provide detailed policy criteria to assess rural diversification proposals.

- 5.78 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 S14 – Visitor Economy.
- 5.79 It is recognised that an important balance exists between rural enterprise / 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 PPW11, 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 will be set out in the Deposit RLDP.

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 Plan 2040 (WG, February 2021)	Policy 4 – Supporting Rural Communities Policy 5 – Supporting the Rural Economy
Planning Policy Wales Edition 11 (WG, February 2021)	Productive and Enterprising Places Theme (Chapter 5)- Rural Economy

Building Better Places (WG, July 2020)	Priorities and Actions for Places - Post Covid-19 Considerations: Staying local: creating neighbourhoods (page 14) Digital places – the lockdown lifeline (page19) Changing working practices: our future need for employment land (page 20) Reawakening Wales’ tourism and cultural sectors (page 21)
Well-being of Future Generations Act (WBFGA) (WG, 2015)	A prosperous Wales A resilient Wales A more equal Wales A Wales of Cohesive Communities
Monmouthshire PSB Well-being Plan (MWBP) (February 2018)	<ul style="list-style-type: none"> • Respond to the challenges associated with demographic change. • Develop opportunities for communities and businesses to be part of an economically thriving and well-connected county. • Protect and enhance the resilience of our natural environment whilst mitigating and adapting to the impact of climate change.
Monmouthshire draft Community and Corporate Plan 2022 2023	This policy supports the draft Community and Corporate Plan goal of ensuring Monmouthshire is a thriving and ambitious place, full of hope and enterprise.
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)
Monitoring	TBC
Detailed Policies	TBC in Deposit RLDP

Visitor Economy

Strategic Policy S14 – Visitor Economy

Development proposals that provide and / or enhance sustainable forms of tourism will be permitted subject to detailed planning considerations.

Development proposals that would have an unacceptable adverse impact on features and areas of tourism interest and their settings, or that would result in the unjustified loss of tourism facilities will not be permitted.

5.80 Tourism plays a significant role in the Monmouthshire economy, particularly in assisting in the diversification of the rural economy and in sustaining the County’s historic town centres. Future Wales 2040 recognises that tourism and leisure is a major and growing employer and contributor to the Welsh rural economy. Policy 5:

Supporting the rural economy⁵⁰ sets out that sustainable forms of tourism including opportunities for active, green, and cultural tourism should be explored within the planning policy framework.

- 5.81 PPW11 (5.5.3) 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. 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. The role of tourism has also been acknowledged in the Welsh Government's 'Building Better Places' policy document where tourism and visitor sectors within rural areas of Wales are noted as key areas to facilitate the Covid-19 economic recovery.
- 5.82 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 Brecon Beacons in the north and the picturesque river corridor of the Wye Valley in the east. Monmouthshire's historic market towns and cultural/heritage assets are also key attractions.
- 5.83 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 £245m to Monmouthshire in 2019 (latest accurate figures available pre- Covid19) and supported the equivalent of 3,119 full-time jobs (STEAM report 2019)⁵¹. The vision and priorities for the visitor economy are set out in Monmouthshire's Destination Management Plan – 2017-2020⁵². The draft revised plan is currently in development. Given the importance of tourism to the Monmouthshire economy the need 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. A recent RTPi paper on Living Locally in Rural Wales⁵³, however, highlights that 'increased tourism visitor numbers can have an overbearing impact on smaller rural villages and therefore require careful planning and management and low value tourism puts

⁵⁰ Future Wales 2040: Policy 5: Supporting the rural economy [Update to Future Wales - The National Plan 2040 \(gov.wales\)](https://gov.wales)

⁵¹ STEAM Trend Report 10-2019

<https://www.visitmonmouthshire.com/dbimgs/STEAM%20Report%20MOM%202021.pdf>

⁵² Monmouthshire's Destination Management Plan 2017-2020

[https://www.visitmonmouthshire.com/dbimgs/FINAL%20July%202017%20Monmouthshire%20Destination%20Plan%202017-2020\(1\).pdf](https://www.visitmonmouthshire.com/dbimgs/FINAL%20July%202017%20Monmouthshire%20Destination%20Plan%202017-2020(1).pdf)

⁵³ ⁵³Living Locally in rural Wales: RTPi Cymru 2022 [Plan The World We Need \(rtpi.org.uk\)](https://www.rtpi.org.uk)

pressure on services and infrastructure but contributes comparatively little to local business and that there is therefore ‘a balance to be found.’

- 5.84 The RLDP therefore has a key role in supporting and protecting Monmouthshire’s rural economy by enabling development that safeguards, provides and enhances tourism that both supports local communities and protects the natural and built environment, key drivers of Monmouthshire’s visitor economy. The RLDP will seek to strengthen the County’s tourism industry by encouraging and planning for sustainable forms of tourism in Monmouthshire. This is defined as tourism that is economically viable, generates local benefits, is welcomed by, and helps support local communities, reduces global environmental impacts and protects / enhances the local environment.

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 16 – Culture, Heritage and Welsh Language
Future Wales: The National Plan 2040 (WG, February 2021)	Policy 4 – Supporting Rural Communities Policy 5 – Supporting the Rural Economy
Planning Policy Wales Edition 11 (WG, February 2021)	Productive and Enterprising Places Theme (Chapter 5)- Tourism Rural Economy
Building Better Places (WG, July 2020)	Priorities and Actions for Places - Post Covid-19 Considerations: Reawakening Wales’ tourism and cultural sectors (page 21)
Well-being of Future Generations Act (WBFGA) (WG, 2015)	A prosperous Wales A resilient Wales A more equal Wales A Wales of Cohesive Communities
Monmouthshire PSB Well-being Plan (MWBP) (February 2018)	<ul style="list-style-type: none"> • Protect and enhance the resilience of our natural environment whilst mitigating and adapting to the impact of climate change. • Develop opportunities for communities and businesses to be part of an economically thriving and well-connected county.
Monmouthshire draft Community and Corporate Plan 2022 2023	<ul style="list-style-type: none"> • This policy supports the draft Community and Corporate Plan goal of ensuring Monmouthshire is a thriving and ambitious place, full of hope and enterprise.
Key Evidence	<ul style="list-style-type: none"> • Sustainable Tourism Accommodation SPG – Nov 2017

	<ul style="list-style-type: none"> • 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 RTP1 discussion paper 2022
Monitoring	TBC
Detailed Policies	TBC in Deposit RLDP

Sustainable Waste Management

Strategic Policy S15 – Sustainable Waste Management	
To facilitate the delivery of sustainable management of waste the Plan will:	
i)	Ensure that proposals conform to the principles 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 the production of waste 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.

5.85 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.

5.86 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).

- 5.87 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 as the Plan progresses. In the meantime, PPW11 and TAN 21: Waste, establish regional monitoring arrangements to inform the preparation of LDPs and assist in the determination of planning applications. The most recent Waste Planning Report for South East Wales was published in April 2016⁵⁴ and concludes that there is currently no need for additional landfill capacity within the region. In addition, the report advises that any new proposal for further residential 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.
- 5.88 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 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)

⁵⁴ The SE Wales Waste Planning Report – April 2016 can be viewed via <https://gov.wales/waste-planning-monitoring-reports>

- 5.89 TAN 21: Waste, notes that many general employment sites and major industrial areas are likely to be suitable locations for waste facilities⁵⁵. Details of those employment land allocations that are considered suitable for the provision of waste management facilities will be provided in the Deposit Plan as well as the detailed criteria against which planning applications for waste management facilities will be assessed. As required by TAN 21: Waste (2014), a ‘Waste Planning Assessment’ will be required 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.
- 5.90 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.
- 5.91 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 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.

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 11 (WG, February 2021)	Productive and Enterprising Places Theme (Chapter 5) -
Building Better Places (WG, July 2020)	Priorities and Actions for Places - Post Covid-19 Considerations: Climate Change and Decarbonisation: take forward measures to embed the principles of a circular economy (page 11).
Well-being of Future Generations Act (WBFGA) (WG, 2015)	A resilient Wales A Wales of cohesive communities A globally responsible Wales

⁵⁵ Paragraph 3.19 of TAN 21: Waste (2014)

Monmouthshire PSB Well-being Plan (MWBP) (February 2018)	<ul style="list-style-type: none"> • Protect and enhance the resilience of our natural environment whilst mitigating and adapting to the impact of climate change. • Develop opportunities for communities and businesses to be part of an economically thriving and well-connected county.
Monmouthshire draft Community and Corporate Plan 2022 2023	This policy supports the draft Community and Corporate Plan goal of ensuring Monmouthshire is a green place to live and work with reduced carbon emissions, 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 2016 Employment Land Review – October 2022
Monitoring	TBC
Detailed Policies	TBC in Deposit RLDP

Minerals

Strategic Policy S16 – Minerals	
<p>The Council will sustainably manage its mineral resources by:</p> <ul style="list-style-type: none"> i) Safeguarding known / potential land won sand and gravel and crushed rock resources for future possible use; ii) Maintaining a minimum 10-year land bank of crushed rock and 7 years land-based sand and gravel 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 land won resources. 	

5.92 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.

5.93 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. PPW11 and Minerals Technical Advice Note 1: Aggregate (2004) (MTAN1) require Local Planning Authorities to make provision for a minimum 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).

- 5.94 A revised RTS – 2nd Review for South Wales⁵⁶ 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 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 and gravel and 6.05 million tonnes for crushed rock. 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 unworked permitted reserves of Limestone at the quarry at Ifton. 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.
- 5.95 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. PPW11 notes that in such circumstances authorities must agree a joint approach with neighbouring authorities in line with current regional arrangements⁵⁷. Monmouthshire will work collaboratively with neighbouring authorities to consider options for satisfying regional apportionments. The latest position will be updated in the Deposit Plan.
- 5.96 Safeguarding areas for potential sources of sand and gravel and crushed rock aggregates will be identified on the Proposals Map accompanying the Deposit Plan in accordance with the National Minerals Resource Maps and the National Aggregates Safeguarding Maps for Wales.
- 5.97 The policy 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.

⁵⁶ Regional Technical Statement – Second Revision main report – Final September 2020 - [1 \(swrawp-wales.org.uk\)](https://www.swrawp-wales.org.uk) and South Wales Appendix B - [1 \(swrawp-wales.org.uk\)](https://www.swrawp-wales.org.uk) and Welsh Government RTS Clarification Letter – 11th November 2021

⁵⁷ Paragraph 5.14.16 – PPW 11 – February 2021

5.98 The Deposit Plan will also set out detailed considerations for mineral planning including the criteria against which mineral applications will be assessed and the protection of buffer zones.

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 11 (WG, February 2021)	Productive and Enterprising Places Theme (Chapter 5) - Minerals
Building Better Places (WG, July 2020)	Priorities and Actions for Places - Post Covid-19 Considerations: Climate Change and Decarbonisation: take forward measures to embed the principles of the sustainable management of mineral resources (page 11).
Well-being of Future Generations Act (WBFGA) (WG, 2015)	A Prosperous Wales A Resilient Wales A Globally Responsible Wales
Monmouthshire PSB Well-being Plan (MWBP) (February 2018)	<ul style="list-style-type: none"> • Protect and enhance the resilience of our natural environment whilst mitigating and adapting to the impact of climate change. • Develop opportunities for communities and businesses to be part of an economically thriving and well-connected county.
Monmouthshire draft Community and Corporate Plan 2022 2023	This policy supports the draft Community and Corporate Plan goal of ensuring Monmouthshire is a green place to live and work with reduced carbon emissions, making a positive contribution to addressing the climate and nature emergency.
Key Evidence	Minerals Technical Advice Note 1: Aggregate (2004) (MTAN1) RTS 2 nd Review published in September 2020 and endorsed by the Minister for Energy, Planning & Rural Affairs March 2021 and Welsh Government RTS Clarification Letter – 11 th November 2021 National Minerals Resource Maps National Aggregates Safeguarding Maps for Wales
Monitoring	TBC
Detailed Policies	TBC in Deposit RLDP

DISTINCTIVE & NATURAL PLACES

- 5.99 Monmouthshire has significant Green Infrastructure, landscape, biodiversity and nature conservation resources, a number of which are of international or national importance.
- 5.100 Reflecting the vision, the Distinctive & Natural Places section seeks to protect, enhance and manage Monmouthshire's Green Infrastructure assets including its; natural heritage, high quality open spaces, distinctive landscapes, protected sites, habitats and species and other biodiversity interests and the ecological connectivity between them. The recent Covid-19 pandemic has emphasised the value and importance of placemaking and of the provision of locally accessible open/green spaces for health and well-being and recreation. This is an essential component of placemaking and links to the draft Community and Corporate Plan goal of ensuring Monmouthshire is a green place to live and work with reduced carbon emissions, making a positive contribution to addressing the climate and nature emergency.
- 5.101 The need to protect and enhance these resources is a key focus of the RLDP. A fundamental element of the RLDP Vision is to protect and enhance the distinctive character of Monmouthshire's Green Infrastructure assets. This will be achieved by preserving and enhancing the best of its high quality natural environment, distinctive character and delivering a placemaking approach.
- 5.102 Future Wales 2040 sets out a commitment to protect and enhance natural resources whereby Policy 9 'Resilient Ecological Networks and Green Infrastructure' sets out that RLDPs should identify areas to be protected and identify opportunities where Green Infrastructure can be maximised. There is also a required emphasis on biodiversity gain (net benefit) to ensure that growth is sustainable.
- 5.103 Policy 15 of Future Wales 'National Forest' also commits to the need to identify national forest sites in order to increase woodland cover throughout Wales and help build the resilience of our ecosystems. The protection and enhancement of our natural places is further reinforced in the recent Welsh Government's Building Better Places, which emphasises the importance of access to and provision of Green Infrastructure in aiding health benefits and well-being of people in the Covid-19 recovery. In addition to this Future Generations Report: Welsh Government Policy Recommendations sets out a commitment to large scale habitat restoration, creativity and connectivity as a top policy priority⁵⁸. The RLDP will provide a positive planning policy framework to support and enable this policy approach through the provision of

⁵⁸ Future Generations Report: Welsh Government Policy Recommendations
<https://www.futuregenerations.wales/wp-content/uploads/2020/06/Welsh-Government-Recommendations.pdf>

locally accessible open green space and the protection and enhancement of our natural environment.

Green Infrastructure, Landscape and Nature Conservation

Strategic Policy S17 – Green Infrastructure, Landscape and Nature Conservation

Development proposals will embrace the placemaking approach and incorporate Green Infrastructure assets and opportunities that are assessed, designed and managed to deliver a multifunctional resource; 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, including climate change action, biodiversity action, mitigation and net gain.

Development proposals must:

Maintain, protect and enhance the integrity and connectivity of Monmouthshire’s green infrastructure, landscapes, biodiversity, public rights of ways and heritage assets through the following key functions:

- (i) Landscape setting and quality of place, by identifying, assessing, protecting and enhancing the distinctive landscape, historical, cultural, ecological and geological heritage, including natural and man-made elements associated with existing landscape character;**
- (ii) 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;**
- (iii) Greenspace provision, connectivity and enjoyment by ensuring the creation of accessible multifunctional interconnected spaces that offer opportunities for recreation and health and well-being;**
- (iv) Sustainable energy use;**
- (v) Local food production; and**
- (vi) Flood attenuation and water resource management.**

Green Infrastructure

5.104 Green Infrastructure (GI) as defined by PPW11 “is the network of natural and semi-natural features, green spaces, rivers and lakes that intersperse and connect places”⁵⁹. The importance of protecting and enhancing Green Infrastructure is a key policy theme within PPW11, recognising the multi-functional roles it has in delivering the

⁵⁹ Paragraph 6.2.1 – PPW – Ed11 – February 2021

goals and objectives of the Future Generation and Wellbeing Act through; active travel, placemaking, ecosystem services, improving ecosystem resilience, climate change mitigation and improving general health and well-being.

5.105 Investment in Green Infrastructure underpins the County's ongoing economic, social and environmental success by supporting sustainable growth, improving quality of life and place, delivering ecosystem services and tackling climate change and poor water quality. Monmouthshire is a green and healthy place to live, with numerous green infrastructure assets including parks, open spaces, playing fields, trees/woodlands, hedgerows, allotments, biological and geological conservation sites, landscape and heritage features, Area of Outstanding Natural Beauty (AONB), World Heritage Site (WHS), canals, rivers, water courses, tidal coastline, cycleways, bridleways, public rights of way and open access land.

5.106 The common aim of spaces and other environmental features is to embrace a placemaking approach. This should help to create a strategically planned and delivered network of green infrastructure assets that should be designed and managed as a multifunctional resource; capable of delivering a wide range of social, economic, environmental, transport and health and well-being benefits for local communities that include:

- Avoiding damage of Green Infrastructure, biodiversity and ecological network;
- Assessing, maintaining and improving public rights of way and countryside sites;
- Tackling deprivation and disadvantage by removing barriers to active travel and to enable more participation in recreation and access to the natural environment and green space;
- Mitigating and adapting to the impacts of climate change;
- Improving health and well-being through a Green Infrastructure approach and through the approach in the Rights of Way Improvement Plan;
- Supporting and providing opportunities for community cohesion and social engagement;
- Delivering placemaking and embracing local distinctiveness; and
- Supporting the local economy through placemaking and a Green Infrastructure-led approach.

5.107 The Council recognise the role Green Infrastructure can play 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 Emergency Strategy and Action Plan also recognises Green Infrastructure as a mechanism for addressing climate change action and mitigation and is also addressed in Strategic Policy S4 – Climate Change.

5.108 Monmouthshire has a strong rural and agricultural economy, and the contribution Green Infrastructure can play in supporting and enhancing this function, should be explored through local food production and rural diversification opportunities. This could include allotment provision, minimum garden sizes standards, the design and management of food production, planting in public realm spaces and supporting pollinating insects through enhancement of biodiversity and plant species.

Area Statements

5.109 The Environment Act (Wales) 2016 introduced a requirement to produce an Area Statement for South East Wales, which Natural Resources Wales 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. Green Infrastructure provision has been recognised as a key contributor to both maintaining and enhancing the delivery of ecosystem services as well supporting the resilience of natural resources and therefore its protection and enhancement is a key mechanism in delivering national and local sustainability objectives. The RLDP will have regard to the Area Statement.

5.110 The Monmouthshire Green Infrastructure Strategy 2019 has informed the evidence base of the SE Wales Area Statement. The Strategy 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 management and delivery of GI in Monmouthshire. It also forms part of the baseline evidence to help inform the Strategic Regional Green Infrastructure Strategy for the Gwent Green Grid Partnership. The Adopted SPG⁶⁰ on Green Infrastructure will be reviewed as part of the RLDP process.

5.111 The Council has produced a Countryside Access Improvement Plan 2020-2030⁶¹ (also known as Rights of Way Improvement Plan) which provides a 10-year plan to manage, promote and improve access, providing for the needs of the public both now and in the future.

Landscape Character

5.112 Monmouthshire benefits from major landscape resources and areas of visual quality and is home to internationally and nationally designated landscapes. 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,

⁶⁰ Green Infrastructure SPG April 2015 <https://www.monmouthshire.gov.uk/app/uploads/2015/07/GI-April-2015.pdf>

⁶¹ Monmouthshire Countryside Access Improvement Plan 2020- 2030 can be viewed via: <https://www.monlife.co.uk/outdoor/countryside-access/rights-of-way-improvement-plan/>

dissected by three rivers, and the historically and ecologically unique coastal landscape to the south. These provide significant environmental, economic and social benefits and help to create a sense of place.

- 5.113 Criterion (i) of Policy S17 seeks to protect, maintain and enhance the character and quality of Monmouthshire's landscape. Development Management policies in the RLDP will specifically protect the internationally designated Blaenavon Industrial Landscape World Heritage Site and the national landscape designations, the Brecon Beacons National Park, which is also a Dark Skies Reserve⁶², and the Wye Valley AONB. Other landscape features which contribute to the County's distinctive character will also be afforded appropriate levels of protection and their significance highlighted using the LANDMAP process.
- 5.114 A review of the Special Landscape Areas (SLAs) designations was undertaken as part of the evidence base for the Adopted LDP. This identified five areas that justified designation as SLAs, effectively covering the majority of Monmouthshire. It was concluded that the designation of the majority of the County as SLA may undermine the intention of the policy to protect those more special landscapes, as reflected in PPW11. Therefore, the Adopted LDP does not contain SLA designations and instead adopted a policy approach to landscape protection and management underpinned by LANDMAP. This approach is to be taken forward in the RLDP and a Landscape Character Assessment SPG for Monmouthshire will be prepared to support the RLDP landscape policies.
- 5.115 The Council has commissioned an update of the existing Landscape and Sensitivity Capacity Assessment which was prepared by Simon White Associates in 2008/2009 to inform the Adopted LDP. The update takes account of Adopted LDP allocations, 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 settlements for residential growth potential. The assessment takes account of the underlying ecosystem service and resilience assets together with a range of designations.
- 5.116 The information contained within the LANDMAP Landscape Character Assessments and the Landscape Sensitivity Update Study (October 2020)⁶³ should be used to ensure that development proposals reflect the distinctiveness, qualities and sensitivities of the County's landscape.

Natural Environment/Biodiversity and Ecosystem resilience

⁶² BBNP Dark Skies <https://www.beacons-npa.gov.uk/communities/sustainability-2/subsustainable-development-fund/sdf-supported-projects/social-inclusion-education-conservation/dark-skies/>

⁶³ Landscape Sensitivity Update Study October 2020 <https://www.monmouthshire.gov.uk/planning-policy/candidate-sites/landscape-sensitivity-study/>

- 5.117 Monmouthshire is rich in biological and geological diversity, which is reflected in the range of international, national and local designations within the plan area, which include:
- Special Protection Area (SPA), Special Areas for Conservation (SACs), Ramsar [international]
 - Sites of Special Scientific Interest (SSSIs), National Nature Reserves (NNRs) [national]
 - Local Nature Reserve (LNR) and Sites of Importance for Nature Conservation (SINCs) [local]
- 5.118 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. PPW11 notes that the broad framework for implementing the Section 6 Duty and building resilience through the planning system will include addressing five key themes of ecosystem resilience: Diversity, Extent, Condition, Connectivity and Adaptability to Change. Section 7 habitats and species are identified by the Welsh Ministers as those they consider are of key significance to sustain and improve biodiversity in relation to Wales.
- 5.119 The RLDP will seek to maintain and improve the biodiversity and geology of the County through the assessment, protection, restoration and enhancement of valuable ecological habitats, wildlife networks and corridors, as well as the creation of new habitats and reducing the spread and impact of invasive non-native species (INNS). This applies to both direct and indirect effects as development outside an important site can still have a damaging impact.
- 5.120 PPW11 and Technical Advice Note 5: Nature Conservation and Planning, provide for the tiered protection of designated sites and set a clear context for the relevant policy approach to these sites, with those of international and national importance being afforded more protection than those of local importance.
- 5.121 Natura 2000 sites are classified under EU Directives and as such enjoy statutory protection under European legislation. The Habitats Directive requires that development proposals likely to have a significant effect on a European site are subject to an Appropriate Assessment. National guidance and legislation is provided on this matter. A Habitats Regulations Assessment is being prepared as part of the RLDP process.
- 5.122 Development proposals affecting locally designated non-statutory sites, or undesignated sites that satisfy the relevant designation criteria, and Section 7 habitats/species of importance, will be assessed against the relevant Development Management Policies included in the Deposit Plan.

5.123 Following new evidence about the environmental impacts of phosphate in watercourses, Natural Resources Wales (NRW) has adopted tighter targets for the water quality of watercourses and have assessed the nine riverine Special Areas of Conservation in Wales. Within Monmouthshire it was 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% failed to meet the required target. As a result of this failure NRW has issued a Wales-wide river SAC phosphate compliance report⁶⁴ to ensure that the environmental capacity and water quality of the rivers does not deteriorate any further. Development proposals within the River Wye and River Usk phosphate sensitive catchment areas will have to satisfy NRW’s planning guidance in relation to evidencing that the development can demonstrate phosphate neutrality and betterment in its design and and/or contribution to the water body.

Countryside Access

5.124 As noted above the Monmouthshire Countryside Access Improvement Plan has been produced after extensive consultation and assessments. The countryside access provision in Monmouthshire is extensive. There is over 2,100km of rights of way, of which over 500km is in the Brecon Beacons National Park. 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 Monmouthshire County Council’s policy to increase access to cyclists and horse riders wherever possible. This will 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. The recent Covid-19 pandemic has emphasised the value and importance of the provision of locally accessible open/green spaces for health, well-being and recreation.

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	Policy 9 – Resilient Ecological Networks and Green Infrastructure

⁶⁴ NRW’s Planning Interim Guidance <https://naturalresources.wales/evidence-and-data/research-and-reports/water-reports/compliance-assessment-of-welsh-river-sacs-against-phosphorus-targets/?lang=en>

Plan 2040 (WG, February 2021)	Policy 15 – National Forest
Planning Policy Wales Edition 11 (WG, February 2021)	Distinctive and Natural Places Theme (Chapter 6)
Building Better Places (WG July 2020)	Priorities and Actions for Places - Post Covid-19 Considerations: Green Infrastructure, health and well-being and ecological resilience (page 22) Improving air quality and soundscapes for better health and well-being (page 23)
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
Monmouthshire PSB Well-being Plan (MWBP) (February 2018)	<ul style="list-style-type: none"> • Provide children and young people with the best possible start in life. • Protect and enhance the resilience of our natural environment whilst mitigating and adapting to the impact of climate change.
Monmouthshire draft Community and Corporate Plan 2022 2023	This policy supports the draft Community and Corporate Plan goal of ensuring Monmouthshire is a green place to live and work with reduced carbon emissions, making a positive contribution to addressing the climate and nature emergency.
Key Evidence	TAN5: Nature Conservation and Planning Monmouthshire Landscape Sensitivity Update Study (White Consultants, October 2020) MCC Green Infrastructure Strategy 2019 Adopted Green Infrastructure SPG – April 2015 (to be reviewed as part of the RLDP process) Monmouthshire Countryside Access Improvement Plan 2020-2030 NRWs River SAC (phosphate) Compliance Report
Monitoring	TBC
Detailed Policies	TBC in Deposit RLDP

Next Steps

- 5.125 Following the consultation and stakeholder involvement on the Preferred Strategy, the Council will finalise the RLDP and place it on Deposit. Feedback from the Preferred Strategy consultation will be detailed in the Consultation Report on the Strategy. This report must accompany the RLDP ISA Report and the other supporting documents on Deposit, in accordance with Regulation 17 of the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 (as amended 2015). A summary of key issues raised through the consultation and the Preferred Strategy with any necessary amendments will be reported to Council in Spring 2023 to seek approval of the Preferred Strategy. The Deposit Plan will then be prepared and considered by Council prior to statutory consultation and engagement during Spring 2024.
- 5.126 Following consultation on the Deposit Plan and consideration of the issues raised, it will be submitted to the Welsh Government who will appoint an independent Inspector to examine the RLDP. Having regard to the evidence and representations received during the Deposit consultation, the Inspector must determine whether the RLDP accords with the 'tests of soundness' set out in the Development Plans Manual.
- 5.127 Following the examination, the Inspector will issue a report recommending any necessary changes to the RLDP. The Inspector's report will be binding and the Council must accept the changes and adopt the RLDP as amended. Once adopted, the RLDP will replace the existing Adopted LDP.

Appendix 1 – 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 21 st March – 18 th 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.
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 approved by Council October 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.
	Updated December 2022	Minor updates to reflect latest position.

<p>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.</p>	<p>Non-statutory consultation for four-week period July – August 2019.</p>	<p>Undertaken based on WG 2014-based population and household projections.</p>
	<p>Growth & Spatial Options (December 2020) - Non-statutory consultation on updated options paper January – February 2021</p>	<p>Updated to take account of the 2018-based population and household projections.</p>
	<p>Progressing Monmouthshire’s RLDP Council Report – 27th September 2022</p>	<p>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.</p>
<p>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.</p>	<p>Preferred Strategy (March 2020) – Issued for six-week consultation 9th March 2020 – 22nd April 2020.</p>	
	<p>20th July 2020 – notice of cessation of the Preferred Strategy Consultation due to Covid-19.</p>	<p>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.</p>
	<p>Preferred Strategy (June 2021) – Issued for eight-week consultation 5th July 2021 – 31st August 2021.</p>	<p>Updated to take account of 2018 population projections and reviewed in light of Covid-19.</p>

	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.
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Appendix 2 – RLDP Supporting Documents

Several additional supporting background documents have been prepared to inform the Preferred Strategy. These are listed below and should be read alongside the Preferred Strategy 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 website⁶⁵. Other documents will follow as the Plan progresses.

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 December 2022 ⁶⁶ .	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 December 2022)	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.
Review of RLDP Issues, Vision and Objectives and Evidence base in light of Covid-19 (September 2020, approved by Council October 2020)	This report provides an update and review on the preparation of the Replacement Local Development Plan (RLDP) in light of the Covid-19 pandemic and in response to publication of a letter from the Minister for Housing and Local Government on 7 th July 2020 ⁶⁷ . The letter requires local planning authorities to undertake an assessment of the RLDP evidence base, strategy and policies in terms of sensitivity to the consequences of the current pandemic before progressing with plan preparation.

⁶⁵ Supporting Background Papers can be viewed via: <https://www.monmouthshire.gov.uk/planning-policy/development-of-an-evidence-base/>

⁶⁶ 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 and October 2020.

⁶⁷ Minister for Housing and Local Government Letter to Local Authority Leaders and Chief Executives National Park Authority Chief Executives – Planning System and Covid-19, 7th July 2020

Integrated Sustainability Appraisal and Habitats Regulations Related Documents	
Integrated Sustainability Appraisal (ISA) Scoping Report (Updated November 2022)	Updated to take account of responses from a targeted consultation, 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)	Updated to take account of responses from a targeted consultation, 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.
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 Preferred Strategy.

Growth and Spatial Options Paper (September 2022)	Provides the background to the growth and spatial option for the Preferred Strategy together with a review of the extent to which they will achieve the RLDP objectives.
Housing Background Paper (December 2022) to be updated to accompany the Deposit Plan	This paper analyses each component of housing supply in more detail before arriving at a new 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 (2020)	Provides a detailed insight into the local housing markets across the County. It includes a quantitative assessment of housing need that will be used to inform the housing policies of the RLDP in terms of affordable housing provision, tenures and types of accommodation required. An updated LHMA is being prepared using the new Welsh Government template.
Gypsy and Traveller Accommodation Assessment – January 2021.	Report assessing the accommodation needs of Gypsy and Traveller families and establish the number of pitches required to meet the identified need. Submitted to Welsh Government following Cabinet approval January 2021 – awaiting approval from Welsh Government.
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 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.
Retail Background Paper (August 2022)	Provides an annual retail 'health check' of our five main towns (i.e. Abergavenny, Caldicot, Chepstow, Monmouth and Usk).
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.
Minerals Regional Technical Statement – 2 nd Review for South Wales (September 2020) & Welsh Government RTS Clarification Letter – 11 th 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 – 2 nd 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 – April 2016	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.
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 <i>Practice</i>

	<i>Guidance: Planning for Renewable and Low Carbon Energy – A Toolkit for Planners, September 2015.</i> 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.
Self-Assessment of the Preferred Strategy against the Tests of Soundness (December 2022)	This sets out an assessment of the Preferred Strategy against the Tests of Soundness, together with the Strategy’s general conformity with Future Wales 2040; the National Plan.
Candidate Sites	
Candidate Site Register (February 2022)	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 Sites High-level Assessment (December 2022)	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.

Appendix 3 – Legislative and Policy Context

The Preferred Strategy 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.

Legislative Context	
Well-being of Future Generations Act (Wales) 2015	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.
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.
Policy Context	
Future Wales – The National Plan 2040 (Welsh Government, February 2021)	Sets out 11 outcomes which collectively are a statement of where the Welsh Government want Wales to be in 20 years’ time. The outcomes are intended to be inter-related and inter-dependent and are proposed to improve places and well-being across Wales. It notes growth and new development must be in the right place, undertaken in the right way and make efficient use of resources to achieve the Future Wales outcomes.
Planning Policy Wales Edition 11 (2021)	Sets out the land use planning policies and overarching sustainable development goals for Wales. PPW11 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.
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. Formal commencement is awaiting resolution of a number of outstanding issues regarding the establishment of CJs.
Building Better Places - The Planning System Delivering Resilient and Brighter Futures: Placemaking and the Covid-19 recovery (WG, July 2020)	Sets out the Welsh Government's planning policy priorities to assist in taking action in the recovery period after the Covid-19 pandemic. It highlights the key existing planning policies and tools which should be used by all sectors in the environmental, social, cultural and economic recovery of Wales.
Prosperity for All: A Low Carbon Wales (2019)	Sets the foundations for Wales to transition to a low carbon nation; setting out the Welsh Government's approach to increasing efficiency and cutting emissions of greenhouse gasses by at least 80% by 2050. All Development Plans must ultimately support the strategic decarbonisation goals to facilitate clean energy and build resilience to the impacts of climate change.
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.

Regional Context	
Cardiff Capital Region City Deal	Comprises ten local authorities across the South East Wales region, including Monmouthshire, who are working collaboratively on projects and plans for the area to seek to tackle issues that affect the whole of the region, such as worklessness and poor transportation links. The authorities have entered into a City Deal to fund projects aimed at boosting the competitiveness of the region over the next 20 years.
South East Wales Metro	To grow its economy, there is widespread recognition that the Cardiff Capital Region needs major investment in its infrastructure to help it play a bigger role in the UK economy. A regional approach, underpinned by a transformation in public transport, will help to fulfil this ambition, enabling the region to raise its international profile and compete more effectively on the world stage.
Gwent Public Services Board (PSB) Consultation Draft Well-being Plan for Gwent (2022)	The five separate PSBs in the Gwent region began work to undertake a Gwent wide well-being assessment with local assessments for each local authority area in 2021. This was published in May 2022 and has been used to develop the consultation draft Gwent Well-being Plan. The draft 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 three draft objectives; to create a fair and equitable Gwent for all, to create a Gwent that has friendly, safe and confident communities and to create a Gwent where the natural environment is protected and enhanced. The final Well-being Plan for Gwent will be published in May 2023.
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.
Local Context	
The Monmouthshire Well-being Plan (Public Service Board) February 2018	The Monmouthshire Well-being Plan was prepared by the Public Service Board (PSB). While carried out on behalf of the Public Service Board rather than Monmouthshire County Council specifically, it identifies important issues for the County as a whole that must be considered.

The draft Monmouthshire Community and Corporate Plan 2022	The draft Community and Corporate Plan ⁶⁸ is produced by Monmouthshire County Council: our core purpose is to become a zero-carbon county, supporting well-being, health and dignity for everyone at every stage of life. It sets out the Council’s four Well-being Objectives. The RLDP will be an integral means of enabling the well-being of Monmouthshire’s communities and achieving these objectives.
Monmouthshire Climate and Nature Emergency	The Council declared a climate emergency in May 2019. More recently, this has been broadened to incorporate a strengthened emphasis on nature recovery in recognition of the Welsh Government declaration of a nature emergency and the relationship between the two. The RLDP will provide 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.
Motion for Rivers and Ocean (March 2022) & Motion for Rivers and Ocean Action Plan (September 2022)	The health of our rivers and ocean is inextricably linked to climate and human health, the motion acknowledges the Council’s concerns about the declining state of the Rivers Wye and Usk and the multiple sources of phosphate and other pollutants including those originating upstream outside of the County, which are threatening biodiversity and wildlife. The Action Plan pulls together the work that is going on across many different council services in a co-ordinated way and addresses areas where the council could be doing more to protect our rivers and coast.
Vision Monmouthshire 2040: Our Economic Growth and Ambition Statement (November 2019) and Inward Investment Prospectus 2020: Growing your Business in Monmouthshire	The statement considers the kind of future the Council wishes to create, including consideration of the demographic changes, infrastructure and skills needed to support this while at the same time ensuring environmental impact is limited. 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 Local Transport Plan	A new Local Transport Plan (LTP) is being produced to accompany the RLDP. It will identify 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

⁶⁸ The draft Community and Corporate Plan 2022 sets out the Council’s core purpose, principles, and priorities. It was endorsed by Cabinet on 19th October 2022 and a developed version will be reported to Council in January 2023 **adopted by Council on 20th April 2023.**

	prosperity for all and protects the environment; where walking, cycling, public transport and sustainable freight provide real travel alternatives.
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Appendix 4 – RLDP Issues

Full details are set out in the Issues, Visions and Objectives Paper (Updated December 2022)⁶⁹. The table below provides an extract of the issues facing the County and how the RLDP can influence these issues. The RLDP issues were reviewed in light of the Covid-19 pandemic and endorsed by Cabinet on 17th June 2020 and Council on 22nd October 2020 as remaining relevant. A number of issues were found to have increased emphasis and importance in light of Covid-19, these are indicated in the table below using an asterisk against both the headline and relevant individual Issues. An additional section has also been included within the table to provide further detail on how the RLDP can support such issues given their increased emphasis in light of Covid-19. The latest update relates to minor amendments only. 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 for appropriate growth sectors. There is also a need to consider potential future demand for employment land along with Council aspirations for innovation across Monmouthshire in light of the ambitions and opportunities associated with the Cardiff Capital Region City Deal (CCRC) and Bristol region.
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.

⁶⁹ The Issues, Vision and Objectives Paper can be viewed via the following link: <https://www.monmouthshire.gov.uk/planning-policy/plan-preparation/issues-vision-and-objectives/>

Issue 5* - The increasingly ageing population and shrinking working age population (the relative absence of 20-40 year olds and our median age of 48 years, compared to a median age of 34 years in Cardiff) 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 (2011 Census). Efficient digital infrastructure is essential to support home working and the general connectivity of the County's rural areas and to support economic growth⁷⁰.

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 2019 2.28 million visitors came to Monmouthshire, having an overall economic impact of £245 million. Staying visitors generate a higher economic impact than day visitors at £185million compared to £59 million in 2019 (Monmouthshire STEAM Report 2019) highlighting the continued need for visitor accommodation. The covid-19 pandemic has provided an opportunity to promote staycations. 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 can encourage 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 can aim 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 can ensure 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 Replacement LDP can 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.

⁷⁰ The current situational analysis of Superfast Broadband Next Generation Access (NGA) coverage in the Cardiff Capital Region, based on the OMR/SAPC undertaken prior to the Superfast Cymru Phase 2 (SFC2) Procurement, paints a stark picture in terms of the current lack of coverage in Monmouthshire in comparison to our other nine Local Authority partners - currently 12.56% of premises in Monmouthshire are NOT covered in comparison to 3-4% in the other nine Local Authorities within the region.

A(iv) The RLDP needs to take 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 can contain policies that support the diversification of the rural economy.

A(vi) The RLDP can help to address digital exclusion by seeking to support the improvement of rural broadband and delivery of high speed connections.

A(vii) The RLDP must contain policies 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 ensure that the distribution of development supports these main centres in order to retain retail expenditure.

A(viii) The RLDP will enable a review of 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 can contain 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.

How can the RLDP support these Issues given increased emphasis in light of Covid-19

The RLDP will provide a positive planning policy framework to support and enable sustainable economic growth, including in relation to our high streets and tourism sector, over the Plan period, making our towns attractive places for residents and visitors to spend time and money.

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 can seek 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 can also take 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 can support the provision of ultra-low emission vehicle charging infrastructure.

Green Infrastructure, Biodiversity & Landscape*
Issue
<p>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.</p> <p>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.</p>
How can the RLDP Influence these Issues?
<p>C(i) The RLDP should ensure 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. There is no identified strategic solution for phosphate mitigation at the Monmouth WwTW (upper River Wye Catchment) at this time. Without an identified strategic solution new site allocations cannot be included in the RLDP in the upper River Wye Catchment. The RLDP must also ensure development in the River Usk catchment area does not contribute to or increase phosphate levels.</p> <p>C(ii) The RLDP must ensure biodiversity is considered in any development in order to protect any interest on the site and encourage biodiversity enhancements.</p> <p>C(iii) It will be necessary to undertake a Integrated Sustainability Appraisal (ISA) Scoping Report (Updated November 2022)s Regulations Assessment of 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.</p> <p>C(iv) The RLDP can contain policies to protect and enhance the green and blue infrastructure networks across the County.</p>
How can the RLDP support these Issues given increased emphasis in light of Covid-19
The RLDP will provide a positive planning policy framework to support and enable placemaking and the provision of locally accessible open /green space and to protect/enhance our natural environment and biodiversity.
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?

<p>D(ii) The RLDP must ensure 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.</p>
<p>Minerals & Waste</p>
<p>Issue</p>
<p>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.</p> <p>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.</p>
<p>How can the RLDP Influence these Issues?</p>
<p>E(i) The RLDP can identify sites that are appropriate for waste management or disposal facilities to meet local or regional requirements.</p> <p>E(ii) The RLDP can ensure 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.</p>
<p>Land</p>
<p>Issue</p>
<p>Issue 16 - There are limited opportunities for brownfield development within the County's existing urban areas.</p> <p>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). Recent Welsh Government clarification of policy priorities of protecting BMV land over renewable energy development has implications for the findings of the Renewable Energy Assessment and for MCC's requirements to become carbon neutral by 2030.</p>
<p>How can the RLDP Influence these Issues?</p>
<p>F(i) The RLDP will seek to prioritise the use of previously developed land where opportunities arise.</p> <p>F(ii) The RLDP should seek 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.</p>

A Healthier Wales (Well-being Goal 3)
Human Health*
Issue
<p>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.</p> <p>Issue 19* - While an ageing population brings many opportunities, it also brings challenges and increases in the number of people living with long term conditions can create pressures on existing health care provision.</p> <p>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 recreational facilities. This can contribute to rural isolation in certain areas.</p> <p>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.</p>
How can the RLDP Influence these Issues?
<p>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.</p> <p>G(ii) The RLDP can provide policies to ensure health care provision is supported.</p> <p>G(iii) The RLDP can affect the provision of public open space and recreation by protecting, where necessary, existing open space and facilities as well as requiring new development to make a contribution to the provision of additional facilities.</p>
How can the RLDP support these Issues given increased emphasis in light of Covid-19
The RLDP will provide a positive planning policy framework to support and enable placemaking and the provision of locally accessible open /green space, leisure and healthcare provision and to protect/enhance our natural environment.
A More Equal Wales (Well-being Goal 4)
Population*
Issue
<p>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).</p> <p>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.</p>

<p>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.</p>
<p>How can the RLDP Influence these Issues?</p>
<p>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.</p> <p>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 needs to take 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.</p> <p>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.</p>
<p>How can the RLDP support these Issues given increased emphasis in light of Covid-19</p>
<p>The RLDP growth levels will deliver positive demographic change over the Plan period that is essential to support and enable the provision of balanced communities throughout the County.</p>
<p>A Wales of Cohesive Communities (Well-being Goal 5)</p>
<p>Housing*</p>
<p>Issue</p>
<p>Issue 25* - Average house prices in the County are high at £398,859 when compared to the Welsh average of £236,439 (Hometrack, November 2022)⁷¹. The most significant increases have been experienced in recent years. There is a need to consider the potential impact on house prices arising from the removal of the Severn Bridge Tolls in 2018, the ambitions and opportunities associated with the Cardiff Capital Region City Deal and the South East Wales Metro, together with the economic growth of the Bristol/SW region and the opportunities for Monmouthshire as a border county and its location between Bristol and Newport and Cardiff, the ‘Great Western Cities’.</p>

⁷¹ Based on sales and valuations over six month period March 2022 – August 2022. Sales only over same period related to £351,643 for Monmouthshire and £224,101 for Wales. Data accessed on 02/11/2022.

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 will affect 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 can also ensure a range and choice of homes are available in new developments and influence 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 can provide urgently needed affordable housing within exemplar, mixed, sustainable and well-connected places.

How can the RLDP support these Issues given increased emphasis in light of Covid-19

The RLDP will ensure /enable a range and choice of homes (housing mix) in future housing developments to address affordability issues and to build sustainable and resilient communities. The Preferred Strategy allows for a level of growth and for affordable housing-led sites: this remains critical to addressing the issues and objectives. The density of development can support placemaking and ensure open greenspaces are incorporated, benefitting wellbeing.

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?

<p>J(i) The RLDP can consider allocating 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.</p> <p>J(ii) The RLDP can help ensure adequate provision of infrastructure to serve new development and can contain support policies to enable improvements or enhancements for existing development, e.g. provision of electric vehicle (EV) charging, broadband connectivity and renewable energy.</p> <p>J(iii) The RLDP will contain allocations and policies to support the priorities of the emerging local transport plan and cycling strategy.</p>
<p>How can the RLDP support these Issues given increased emphasis in light of Covid-19</p>
<p>The RLDP will ensure digital and charging infrastructure provision is in place or can be provided to accommodate new development and will support active travel opportunities.</p>
<p>A Wales of Vibrant Culture & Thriving Welsh Language (Well-being Goal 6)</p>
<p>Cultural Heritage</p>
<p>Issue</p>
<p>Issue 32 - Monmouthshire has a significant built heritage resource in terms of Scheduled Ancient Monuments, Listed Buildings, Conservation Areas, Historic Parks and Gardens and Archaeologically Sensitive Areas that, together with their settings, require protection and enhancement.</p> <p>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.</p> <p>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 is likely to receive further pressure for growth due to the removal of the Severn Bridge Tolls in 2018 and the ambitions and opportunities associated with the Cardiff Capital Region City Deal and the South East Wales Metro, together with the economic growth of the Bristol/SW region and the opportunities for Monmouthshire as a border county and its location between Bristol and Newport and Cardiff, the 'Great Western Cities'.</p>
<p>How can the RLDP Influence these Issues?</p>
<p>K(i) The RLDP can contain measures to preserve and enhance the built heritage and best of the historic environment of Monmouthshire.</p> <p>K(ii) The RLDP can help 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.</p> <p>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</p>

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 grounds⁷².

K(iv) The RLDP can play a key role in promoting good quality sustainable design that will enable new development and future growth to respect and enhance the existing distinctive character of Monmouthshire.

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 Area of Outstanding Natural Beauty, the Brecon Beacons National Park and the Blaenavon Industrial Landscape World Heritage Site.

How can the RLDP Influence these Issues?

L(i) The RLDP must seek to protect high quality landscapes throughout the County, paying particular attention to those contained in the Wye Valley Area of Outstanding Natural Beauty, the Blaenavon World Heritage Site and in the setting of the Brecon Beacons National Park.

A Globally Responsible Wales (Well-being Goal 7)

Climatic Factors*

Issue

Issue 36* - The volume of traffic in the County has continued to increase, up nearly 19% in the nine years to 2019 (StatsWales, April 2019). 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, however, a more proactive approach should be undertaken for schemes of a local authority scale (i.e. 5MW - 25MW).

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°C.

How can the RLDP Influence these Issues?

⁷² Technical Advice Note 20 paragraphs 1.7.3, 2.2 and 2.6.4

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 needs to consider appropriate patterns of development that promote a safe, efficient, accessible and sustainable transport system that provides opportunities for walking and cycling and encourages active travel in order to support carbon reduction. The RLDP will provide 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 is in progress to identify areas of potential for local authority and strategic renewable energy development.

M(iii) The RLDP will consider ways to support carbon reduction through a variety of measures including the use of renewable energy, 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. Proposals will be considered against our commitment to strive to limit the increase in global temperatures to 1.5°C.

How can the RLDP support these Issues given increased emphasis in light of Covid-19

The RLDP policy framework will support and enable renewable energy generation and provide opportunities for active travel and integrated sustainable transport solutions.

** indicates the Issue has increased emphasis and importance in light of Covid-19*

Appendix 5: Preferred Strategic Site Allocations

- A.5.1 Strategic Policy S7 identifies Preferred Strategic Site Allocations for the Primary Settlements of Abergavenny (including Llanfoist), Chepstow, **Monmouth** and Caldicot (including the Severnside Area comprising of: Caerwent, Crick, Magor, Undy, Portskewett, Rogiet and Sudbrook). 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 Preferred Strategy. Site selection has been informed by the assessment of candidate sites and the consultation responses received on the 2021 Preferred Strategy **and the December 2022 Preferred Strategy**.
- A.5.2 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 6 below provides further detail. The **three four** Preferred Strategic Site Allocations identified in the new Preferred Strategy are highlighted.

Table 6: Preferences cast on Strategic Site Options at time of 2021 Preferred Strategy consultation.

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 F is no longer being put forward for development by the site promoter

Consideration of Brownfield Land

- A.5.3 Planning Policy Wales emphasises the importance of re-using brownfield sites, however, there are limited opportunities for further significant brownfield development in Monmouthshire with the two main sites (Sudbrook Paper Mill and Fairfield Mabey, Chepstow) being redeveloped via the current LDP. The RLDP objective is therefore to achieve sustainably located urban extensions that can be well-connected to town centres and public transport. The RLDP will allocate those sites that are the best connected, most sustainable sites that best deliver placemaking and are least harmful. This will require balanced consideration and trade-offs at Deposit Plan stage. The same approach has been taken in identifying the Preferred Strategic Site Allocation for each primary settlement.

Consideration of the Best and Most Versatile Agricultural Land

- A.5.4 There is a need to protect Monmouthshire's Best and Most Versatile (BMV) agricultural land. PPW11 Paragraphs 3.58 and 3.59 clearly sets out 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.'* PPW11 further states that in development plans *'...considerable weight should be given to protecting such land from development, because of its special importance. Land in grades 1, 2 and 3a should only be developed if there is an overriding need for the development, and either previously developed land or land in lower agricultural grades is unavailable, or available lower grade land has an environmental value recognised by a landscape, wildlife, historic or archaeological designation which outweighs the agricultural considerations. If land in grades 1, 2 or 3a does need to be developed, and there is a choice between sites of different grades, development should be directed to land of the lowest grade.'*
- A.5.5 Monmouthshire is a predominantly rural County and one of the key issues that has been identified (Issue 17) is that *'...there is a significant high percentage of BMV agricultural land with limited Brownfield land development opportunities'*. Moreover, many areas of lower agricultural quality are floodplain and therefore are ruled out for that reason. The preparation of Monmouthshire's RLDP therefore needs to set out an approach to protect BMV land and minimise its loss as far as possible through its growth and spatial strategy but recognising that is unlikely to be possible in all cases.
- A.5.6 A sequential approach to assessing the loss of BMV agricultural land, as set out by PPW11, has been undertaken in the assessment of all Candidate Sites. It is anticipated however, that due to the significant amount of BMV agricultural land throughout Monmouthshire it will be difficult to apply this sequential test in practice. Furthermore, at this stage the indicative grades of BMV agricultural land are primarily based on the high level predictive map and are therefore likely to be subject to change following detailed surveys. The aim at the outset nevertheless, will be to protect the higher grades of BMV land and to avoid/or minimise the loss of BMV land. The following pragmatic approach has been undertaken to date:

- A desktop assessment using the Agricultural Land Classification (ALC) Predictive Map for Wales (Version 2 2019), this provides a broad overview of the ALC for a particular area; however, it is not a detailed site assessment.
- The Second Call for Sites form included a specific question on ALC in order to gather information regarding the quality of, and potential loss of, agricultural land direct from site promoters.
- Detailed ALC field surveys have been provided for the majority of sites but further information will be required for any sites allocated in the Deposit RLDP in order to further ascertain the precise ALC and quality of the land.
- Consultation has been undertaken with relevant stakeholders/consultees including the Welsh Government Agricultural Land Use Unit.

A.5.7 It is important to note that protection of BMV agricultural land must be balanced with other considerations. For example, lower quality agricultural land is typically found in floodplains, but these areas cannot be developed for other policy reasons. Consideration must also be given to proximity to amenities and infrastructure, landscape impact, ecology and site deliverability.

A.5.8 An Agricultural Land Classification Background Paper will be produced at Deposit Plan stage. This will clearly set out the above methodology and the outcomes from the BMV land assessment.

Abergavenny including Llanfoist

A.5.9 Abergavenny is identified as a Primary Settlement in the RLDP settlement hierarchy. It has public transport links by rail and bus to Cwmbran, Newport, Cardiff and the Midlands, and road links to Cwmbran, Newport, Monmouth and the motorway system. It has a particularly important strategic role on the Heads of the Valleys road through its links to Brecon, Mid Wales and the wider Cardiff Capital Region. The A465 separates the town from Llanfoist to the south, and partly defines the town edge to the east. The built-up area to the north and west extends close to the Brecon Beacons National Park boundary, and Llanfoist adjoins the Blaenavon World Heritage Site.

A.5.10 Facilities and services score well within the Sustainable Settlement Appraisal, as the town centre has a relatively large number and range of shops and restaurants, a theatre, cinema, and museum, and is a vibrant focus for the surrounding area. It is also one of the most self-sufficient settlements in terms of employment with a variety of employment sites within the town.

A.5.11 Future growth of the town is constrained by a number of factors. Abergavenny's landscape sensitivity to residential development⁷³ is high and high/medium, with an area of medium sensitivity to the south of Llanfoist.⁷⁴ The areas immediately north

⁷³ A standard methodology relating to the landscape sensitivity to housing development has been applied to the assessment of candidate sites in the Landscape Sensitivity Update Study – October 2020.

⁷⁴ Monmouthshire Landscape Sensitivity Update Study – October 2020 can be viewed via: <https://www.monmouthshire.gov.uk/planning-policy/candidate-sites/landscape-sensitivity-study/>

and west of the town adjoin the Brecon Beacons National Park, and the town centre itself is a Conservation Area. The floodplain of the River Usk is a further constraint on development to the south of the town and in parts of Llanfoist.

A.5.12 Abergavenny sits within the River Usk Special Area Conservation (SAC) catchment area. The Strategic Site allocation will therefore need demonstrate phosphate neutrality or betterment in its design and/or its contribution to the water body. A strategic solution has been identified by Dŵr Cymru Welsh Water for implementation during AMP7 (by 2025).

Abergavenny East

A.5.13 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.

A.5.14 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.

A.5.15 The land is categorised as having high/medium landscape sensitivity to residential development in the Landscape Sensitivity Update⁷⁵. The site is mostly located on an area of predictive grade 2/3a BMV agricultural land. However, when considering the search sequence recommended in PPW11 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.

⁷⁵ Monmouthshire Landscape Sensitivity Update – October 2020 can be viewed via:
<https://www.monmouthshire.gov.uk/planning-policy/candidate-sites/landscape-sensitivity-study/>

A.5.16 Taking into account the delay with the RLDP, the time needed to open up the site (including the provision of significant infrastructure namely a cycle footway bridge over the A465 and railway) and a realistic completion rate, the size of the candidate site means development would extend beyond the Plan period. However, its allocation could helpfully identify the long-term direction of growth for the town. This longer-term potential is advantageous.

Chepstow

A.5.17 Chepstow is identified as a Primary Settlement in the RLDP settlement hierarchy. 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.

A.5.18 Facilities and services score well within the Sustainable Settlement Appraisal, as the town centre has a relatively large number and good range of shops and restaurants and is a vibrant focus for the surrounding area. The town 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.

A.5.19 Future growth of the town, however, is heavily constrained due to a range of local and national environmental and heritage designations and its location on the River Wye and border with England. Chepstow's landscape sensitivity to residential development is high and high/medium to the north and south of Chepstow with medium sensitivity recorded for an area of land to west of Chepstow, however there are various other constraints to the west. The area immediately north of the town lies within the Wye Valley AONB⁷⁶. Some parts of the historic centre benefit from flood relief measures, but other areas close to the River Wye remain at risk of flooding. The town centre itself is a Conservation Area. Land to the west of the A466 is currently protected in the Adopted LDP by a "green wedge" policy to ensure the town's physical separation from Pwllmeyric and Mathern. Current green wedge designations will be reviewed as part of the RLDP process. South of the A48, the undeveloped land is also within a Conservation Area and, in part, within a designated Historic Park and Garden.

A.5.20 There are highway capacity issues which will need to be addressed as part of any future development proposals. A section of the A48 on Hardwick Hill is designated as an Air Quality Management Area: the A48 trunk road passes through the town and provides the main link between the southern part of the Forest of Dean and the motorway network, including the main route from parts of Gloucestershire to Bristol via the Severn Bridge. MCC recently responded to the Forest of Dean Council expressing concerns regarding the potential impacts of proposed growth in the Forest without suitable investment in transport improvements.

⁷⁶ Monmouthshire Landscape Sensitivity Update Study – October 2020 can be viewed via:
<https://www.monmouthshire.gov.uk/planning-policy/candidate-sites/landscape-sensitivity-study/>

A.5.21 Policy 34 - Green Belts in the South East - of Future Wales indicates a green belt on land to the north of Chepstow. In assessing Candidate Sites and their relationship to Policy 34 of Future Wales consideration has been given to paragraph 3.72 of PPW11 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. A Green Belt Study has been commissioned on a sub-regional basis to inform the evidence base of RLDPs and the South East Wales SDP.

Bayfield, Chepstow

~~A.5.22 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, south of the Usk road (B4235). The site adjoins the AONB and is in close proximity to Chepstow Racecourse. PPW11 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 AONB are acceptable. The land is categorised as being of medium landscape sensitivity to residential development⁷⁷.~~

~~A.5.23 The site is approximately a mile or an approximate 15 minute walking distance from the town centre, half a mile (approximately 9 minute walk) from Chepstow Comprehensive School and Leisure Centre, and 1.1 miles (approximately 21 minutes 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.~~

~~A.5.24 The land is predictive grade 3a BMV agricultural land. However, when considering the search sequence recommended in PPW11 it is noted that most of the land surrounding Chepstow is either of BMV status or affected by other constraints. The alternative Strategic Development Site option is on higher quality BMV land. 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.~~

⁷⁷ Monmouthshire Landscape Sensitivity Update – October 2020 can be viewed via:
<https://www.monmouthshire.gov.uk/planning-policy/candidate-sites/landscape-sensitivity-study/>

Mounton Road, Chepstow

A.5.22 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, north of the A48. The site will provide a sustainable affordable housing-led mixed-use development, where there are opportunities to co-locate homes and commercial uses.

A.5.24 The site benefits from under 20-minute walking times to Chepstow's town centre and key services and facilities. It is an approximate walking distance of 15 minutes to Chepstow's town centre (Bank Square) and to Bulwark neighbourhood centre (Lidl), and a 5-minute walking time to the nearest convenience store (Larkfield Garage). The primary catchment school (Pembroke School) is approximately a 15-minute walk and Chepstow's secondary school a 17-minute walk. The train station is approximately a 19-minute walk and it is considered that there will be opportunities to connect the site to Chepstow's core with active travel links and promote the use of sustainable modes of travel, facilitating modal shift.

A.5.23 The area between Mounton Road and the A48 is currently designated in the Adopted LDP as "green wedge". The existing green wedges are being reviewed and initial findings suggest that this parcel of land makes a low-moderate contribution to green wedge purposes and as such, it is not necessary to retain this as green wedge. This is due to this parcel of land having a limited impact at preventing the coalescence with nearby settlement Pwllmeyric, due to the intervening woodland to the south west which form a strong boundary, and the A48 to the south east forms a strong boundary limiting the impact that development would have on adjacent land. The findings suggest that development in this parcel would not significantly weaken the remaining gap between Chepstow and Pwllmeyric. The Green Wedge Review will be published alongside the Deposit Plan when this site goes out for detailed public consultation.

A.5.24 The land is categorised as being of medium landscape sensitivity⁷⁸ to residential development, having the character of pastoral parkland in the immediate setting of a Registered Park and Garden and close proximity to historic listed buildings and Mathern's Conservation Area. It is considered, however, that mitigation would reduce the extent of development to avoid the most sensitive areas and with a landscape GI-led approach to master planning significant impacts could be reduced. A well-designed scheme could create an attractive gateway to the town and it is noted that the presence of the A48, A466 and Highbeech roundabout does reduce the sensitivity of the historic environment in this location.

A.5.25 The land is predominantly grade 2 and 3a BMV agricultural land (72%). However, when considering the search sequence recommended in PPW11 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

⁷⁸ Monmouthshire Landscape Sensitivity Update – October 2020 can be viewed via:
<https://www.monmouthshire.gov.uk/planning-policy/candidate-sites/landscape-sensitivity-study/>

flood plain meaning an alternative spatial strategy would not avoid allocating BMV land for development.

A.5.26 Other key for this site include the site's location in the limestone minerals safeguarding area, proximity to Chepstow's Air Quality Management Area (AQMA), effects on the A466 and Highbeech roundabout and impact on biodiversity. All these details matters will be given due consideration through the development of the Deposit Plan.

Monmouth

A.5.27 Monmouth is 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.

A 2.28 Facilities and services score well within the sustainability assessment, as the town centre, which itself is a Conservation Area, has a relatively large number and good range of shops and restaurants, a theatre, cinema, and museum, and is a vibrant focus for the surrounding area. It also 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 Wonastow 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 Adopted LDP, which is near completion.

A 2.29 Future growth of the town is constrained by a number of factors. Monmouth's landscape sensitivity to residential development is high and high/medium around most of the settlement edge with an area of medium sensitivity adjoining the western boundary. Immediately to the South East of the settlement is the Wye Valley Area of Outstanding Natural Beauty (AONB). There is no rail network to encourage sustainable travel by rail and therefore highway capacity issues and the need to reduce travel/carbon and support active travel options need to be carefully considered.

A.5.30 Monmouth sits within the River Wye Special Area Conservation (SAC) catchment area. The Strategic Site allocation will therefore need demonstrate phosphate neutrality or betterment in its design and/or its contribution to the water body. A strategic solution to phosphates at the Monmouth Waste Water Treatment Works has been identified by Dŵr Cymru Welsh Water by 31st March 2025.

Leasbrook, Monmouth

A.5.31 Located to the north east of Monmouth's settlement boundary, north of Dixon Roundabout, the preferred strategic site allocation is a sustainably located edge of settlement site. Key facilities including Monmouth town centre, health care, schools

and leisure centre are all within 20-minute walking distance of the site, making it a very accessible via active travel links.

A.5.32 The land is predominantly grades 2 and 3a BMV agricultural land (79%). However, when considering the search sequence recommended in PPW11 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. The site has been assessed as having a high/medium landscape sensitivity and is at the gateway to Wales and to the town.

A.5.33 Other considerations include access to the site as a very small part of the site adjacent Dixton Road is located in flood plain, there is however, opportunity to provide an emergency access to counteract any issue with this. The site is located within close proximity to ecological assets including two SACs, and adjoins the Dixton Conservation Area and a very small portion of the site is located in the Lower Wye Valley Landscape of Historic Interest. Development in this location would need to be carefully designed to ensure any effects on the setting of these designations are acceptable. Development will need to demonstrate phosphate neutrality of betterment in its design and/or its contribution to the water body of the River Wye SAC catchment area.

Caldicot (including the Severnside area)

A.5.34 The Primary Settlement of Caldicot has functional geographic and transport links with the settlements of Magor, Undy, Rogiet, Caerwent, Portskewett, Sudbrook and Crick, which together are considered to share social, economic and environmental 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 Severn Tunnel Junction and Caldicot connecting with the key settlements of Cardiff in the West and Bristol /Cheltenham/Midlands in the East, with enhancements to Severn Tunnel Junction recommended in the South East Wales Transport Commission Final Recommendation Plan (November 2020). 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.

A.5.35 The future growth of the Severnside area is constrained by flood plain on land to the south of the settlements of Caldicot, Magor and Undy, Rogiet and Portskewett. South of these settlements also lies the historic and archaeologically sensitive Gwent levels, which is a Site of Special Scientific Interest (SSSI). Furthermore, the area beyond the Severn Estuary is subject to significant environmental designations including a designated SSSI as well as a Special Area for Conservation (SAC), Special Protection

Area (SPA) and Ramsar site (Wetland of international importance). A large proportion of the Severnside area is also located in a Limestone Mineral Safeguarding Area.

A.5.36 In addition to these, Policy 34 - Green Belts in the South East - of Future Wales indicates a green belt to the north of the M48⁷⁹ within the Severnside area. In assessing candidate sites and their relationship to Policy 34 of Future Wales consideration has been given to paragraph 3.72 of PPW11 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. A Green Belt Study has been commissioned on a sub-regional basis to inform the evidence base of RLDPs and the South East Wales SDP.

⁷⁹ Ministerial letter from Julie James AM, Minister for Housing and Local Government dated 11/10/2019 refers to the M4 and M48 providing a logical, robust and defensible southern boundary for the Green Belt.

Caldicot

A.5.37 Caldicot achieves a high weighted score in terms of sustainability within the Sustainable Settlement Appraisal. It has the largest physical urban area and population within the Severnside cluster. Caldicot is served by two rail stations: Caldicot station is on the Chepstow/Gloucester line and Severn Tunnel Junction is also on the London to Carmarthen line. It is well placed on the road network with the M4 located south of the settlement and the M48 running adjacent to the north of the settlement, although the junction is currently at Magor for the M4 and at Chepstow for the M48. Caldicot is served by a town centre, currently undergoing regeneration, and has numerous educational facilities. Severnside Industrial Estate and Castlegate Business Park are located to the east of the settlement, which is a significant employment base and adjoins the neighbouring settlement of Portskewett. To the west of the settlement is land currently protected by a 'Green Wedge' in the Adopted LDP, which is in place to separate Caldicot from the neighbouring settlement of Rogiet. Green Wedge designations will be reviewed as part of the evidence base of the Deposit Plan. South of the settlement, the land is constrained by flood plain. Growth in recent years has been to the north east of the settlement.

Caldicot East

A.5.38 The preferred strategic site allocation is a sustainably located edge of settlement site. Development here would extend the settlement of Caldicot to the north east, 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.

A.5.39 A small part of the candidate site adjacent to the former railway line is located in 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.

A.5.40 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 PPW11 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.

A.5.41 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/medium⁸⁰. Part of this site is within the limestone minerals safeguarding area.

A.5.42 Taking into account the delay with the RLDP, the time needed to open up the sites and a realistic completion rate, the size of the candidate sites means development would extend beyond the Plan period. However, its allocation could helpfully identify the long-term direction of growth for the town. This longer-term potential is advantageous.

⁸⁰ Monmouthshire Landscape Sensitivity Update – October 2020 can be viewed via:
<https://www.monmouthshire.gov.uk/planning-policy/candidate-sites/landscape-sensitivity-study/>

Appendix 6 – Housing Supply Components

Housing Land Supply Components

- A.6.1 The provision of ~~5,940~~ 6,210 homes will be delivered through a number of different housing land supply components. A detailed description of each component ~~is~~ will be set out in an updated Housing Background Paper that will accompany the Deposit Plan, ~~with~~ a brief summary ~~is~~ set out below.
- A.6.2 The housing land supply /landbank comprises:
- Existing Commitments i.e. Dwelling completions made in the first ~~four~~ five years of the Plan period (2018 – ~~2022~~ 2023), and sites under construction or sites with planning permission as of 1st April ~~2022~~ 2023 that will realistically be delivered and LDP ‘Rollover Allocations’, where the site does not benefit from planning permission, but progress can be evidenced.
 - Allowances i.e. Small site allowance (1-9 dwellings) and windfall allowance (10+ dwellings). Details of where windfall sites could potentially come from are set out in a Housing Potential Study (HPS). Potential sources include possible regeneration schemes within settlements and empty homes and upper floors within town centres.
- A.6.3 Once existing land supply commitments and allowances for windfall/infill sites have been taken into account, the RLDP will need to make provision for new site allocations to deliver ~~2,200~~ 2,125⁸¹ homes over and above the existing commitments. Sites will be allocated to deliver this residual requirement with growth focused in our most sustainable settlements of Abergavenny, Chepstow, Monmouth and Caldicot including Severnside, in accordance with the sustainable settlement hierarchy set out in Policy S2.
- A.6.4 An updated housing balance table will be set out in the Deposit Plan and updated Housing Background Paper which will accompany the Deposit Plan. ~~is set out below and shows how the Plan’s housing provision figure is to be met through a mix of commitments, completions to date, allowances for small sites and windfalls, and new allocations. This is indicative and will be refined as the Plan progresses.~~

⁸¹ The new site allocations figure takes account of completions and windfall and small sites allowances as of 01/04/~~2022~~ 2023 and the application of the ~~10%~~ 15% flexibility allowance. Further detail will be provided in an updated Housing Background paper that will accompany the Deposit Plan. ~~Further information with regards to this can be found in the Housing Background Paper which can be viewed via <https://www.monmouthshire.gov.uk/planning-policy/development-of-an-evidence-base>~~

Appendix 7 – Review of Adopted Local Development Plan Policies

The purpose of this assessment is to identify if the existing Adopted Local Development Plan (LDP) Development Management Policies are functioning effectively, whether any changes are likely to be required and if it is appropriate to carry forward the policies in the Replacement Local Development Plan (RLDP). It should be treated as indicative at this stage as new evidence, guidance or local factors may emerge as the Plan process progresses to justify a different approach to the one noted below. The policies will also need to be regrouped/reordered to reflect the strategic themes set out in PPW11 and Strategic Policies section of the RLDP. The assessment is outlined in the table below.

	Indicates that the Development Management policy will be carried forward possibly with minor amendments.
	Indicates that the Development Management will be carried forward as a Development Management policy with amendments to reflect updated evidence, updated national planning policy guidance or Officer Working Group comments.
	Indicates that consideration is being given to deleting the policy either in its entirety or through the combination/inclusion of the policy objective with another policy.

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Existing Development Management Policies		Commentary	Recommendation
H1	Residential Development in Main Towns, Severnside Settlements and Rural Secondary Settlements	Functioning effectively – slight amendment required to refer to the correct Strategic Policy and settlement hierarchy name amendments.	Carry forward as a Development Management Policy in the RLDP.
H2	Residential Development in Main Villages	Functioning effectively – slight amendment required to refer to the correct Strategic Policy and settlement hierarchy name amendments.	Carry forward as a Development Management Policy in the RLDP.

Existing Development Management Policies		Commentary	Recommendation
H3	Residential Development in Minor Villages	Main thrust of policy is functioning effectively - amendments required in response to Officer Working Group* comments relating to a maximum of 4 dwellings, along with settlement hierarchy name amendments.	Carry forward as a Development Management Policy in the RLDP with amendments to reflect Officer Working Group comments.
H4	Conversion / Rehabilitation of Buildings in the Open Countryside for Residential Use	Amendments required in response to Officer Working Group comments to improve clarity. Further clarity is provided in the Adopted Rural Conversions to a Residential or Tourism Use SPG, which will be amended accordingly and readopted to accompany the RLDP.	Carry forward as a Development Management Policy in the RLDP with amendments to reflect Officer Working Group comments.
H5	Replacement Dwellings in the Open Countryside	Amendments required in response to Officer Working Group comments. Further clarity is provided in the LDP Policies H5 and H6 Replacement Dwellings in the Open Countryside and Extension of Rural Dwellings SPG which will be amended accordingly and readopted to accompany the RLDP.	Carry forward as a Development Management Policy in the RLDP with amendments to reflect Officer Working Group comments.
H6	Extension of Rural Dwellings	Policy functioning effectively. Further clarity is provided in the LDP Policies H5 and H6 Replacement Dwellings in the Open Countryside and Extension of Rural Dwellings SPG which will be amended accordingly and readopted to accompany the RLDP	Carry forward as a Development Management Policy in the RLDP.
H7	Affordable Housing Rural Exceptions	Policy functioning effectively. Amendments required to reflect Officer Working Group comments and PPW11 guidance on Affordable Housing Exception sites being within or	Carry forward as a Development Management Policy in the RLDP with amendments to reflect Officer Working Group comments and national policy guidance.

Existing Development Management Policies		Commentary	Recommendation
		adjoining existing settlement boundaries. These changes would expand the scope of the policy.	
H8	Gypsy, Traveller and Travelling Showpeople Sites	Policy functioning effectively. Minor amendments may be required to reflect Officer Working Group comments and to align with national guidance.	Carry forward as a Development Management Policy in the RLDP with minor amendments.
H9	Flat Conversions	Policy functioning effectively. Minor amendments may be required to reflect Officer Working Group comments.	Carry forward as a Development Management Policy in the RLDP with minor amendments.
CRF1	Retention of Existing Community Facilities	Amendments required to reflect Officer Working Group comments.	Carry forward as a Development Management Policy in the RLDP with amendments to reflect Officer Working Group comments.
CRF2	Outdoor Recreation / Public Open Space and Allotment Standards	Policy functioning effectively. Amendments may be required to reflect updated national planning policy on standards and Officer Working Group comments. The Fields in Trust standards are currently under national review.	Carry forward as a Development Management Policy in the RLDP with amendments to the standards.
CRF3	Safeguarding Existing Recreational Facilities and Public Open Space	Policy functioning effectively.	Carry forward as a Development Management Policy in the RLDP.
RET1	Primary Shopping Frontages	Principle of policy remains relevant. Amendments may be necessary to policy thresholds and Primary Shopping Frontages to reflect evidence, updated national planning policy and Officer Working Group comments.	Carry forward as a Development Management Policy in the RLDP with amendments to reflect updated evidence.
RET2	Central Shopping Areas	Principle of policy remains relevant. Amendments may be necessary to policy wording and Central Shopping Areas boundaries	Carry forward as a Development Management Policy in the RLDP with amendments to reflect updated evidence.

Existing Development Management Policies		Commentary	Recommendation
		to reflect evidence, updated national planning policy and Officer Working Group comments.	
RET3	Neighbourhood Centres	Policy functioning effectively. Minor amendments may be required to reflect Officer Working Group comments.	Carry forward as a Development Management Policy in the RLDP with minor amendments.
RET4	New Retail Proposals	Policy functioning effectively. Minor amendments may be required to reflect updated national guidance and Officer Working Group comments.	Carry forward as a Development Management Policy in the RLDP with minor amendments.
E1	Protection of Existing Employment Land	Principle of policy remains relevant. Amendments may be necessary to reflect the findings of the Employment Land Review and Officer Working Group comments.	Carry forward as a Development Management Policy in the RLDP with amendments to reflect updated evidence.
E2	Non-allocated Employment Sites	Amendments required to reflect Officer Working Group comments and limitations of current policy restricted to single user only or large employers.	Carry forward as a Development Management Policy in the RLDP with amendments.
E3	Working from Home	Delete policy as considered unnecessary and sufficiently covered by other policies.	Delete policy from the RLDP.
RE1	Employment within Villages	Policy is functioning effectively. Amendments may be necessary to reflect the findings of the Sustainable Settlement Appraisal and the findings of the Officer Working Group comments.	Carry forward as a Development Management Policy in the RLDP with minor amendments to reflect updated evidence.
RE2	Conversion/Rehabilitation of Buildings in the Open Countryside for Employment Use	Policy is functioning effectively. Minor amendments may be necessary to reflect Officer Working Group comments.	Carry forward as a Development Management Policy in the RLDP with minor amendments.

Existing Development Management Policies		Commentary	Recommendation
RE3	Agricultural Diversification	Policy is functioning effectively. Minor amendments may be necessary to reflect Officer Working Group comments.	Carry forward as a Development Management Policy in the RLDP with minor amendments.
RE4	New Agricultural and Forestry Buildings	Policy is functioning effectively.	Carry forward as a Development Management Policy in the RLDP.
RE5	Intensive Livestock and Free Range Poultry Units	Amendments needed to reflect Phosphate issues in the River Usk and River Wye Catchment Areas. Amendments may be necessary to reflect Officer Working Group comments and updated Welsh Government guidance set out in Chief Planning Officer letter of 12 th June 2018.	Carry forward as a Development Management Policy in the RLDP with amendments to reflect phosphate issues in the River Usk and River Wye Catchment Areas, Officer Working Group comments and updated national policy guidance.
RE6	Provision of Recreation, Tourism and Leisure Facilities in the Open Countryside	Amendments necessary to reflect update national planning policy and Officer Working Group comments and amendments to address the lack of clarity identified by the former Economy and Development Select Committee which the Sustainable Tourism SPG has sought to resolve.	Carry forward as a Development Management Policy in the RLDP with amendments to reflect Officer Working Group comments and updated national policy guidance and to address the lack of clarity identified by Economy and Development Select Committee which the Sustainable Tourism SPG has sought to resolve.
T1	Touring Caravan and Tented Camping Sites	Amendments necessary to reflect update national planning policy and Officer Working Group comments and amendments to address the lack of clarity identified by the former Economy and Development Select Committee which the Sustainable Tourism SPG has sought to resolve.	Carry forward as a Development Management Policy in the RLDP with amendments to reflect Officer Working Group comments and updated national policy guidance and to address the lack of clarity identified by Economy and Development Select Committee which the Sustainable Tourism SPG has sought to resolve.
T2	Visitor Accommodation Outside Settlements	Amendments necessary to reflect update national planning policy and Officer Working	Carry forward as a Development Management Policy in the RLDP with amendments to reflect

Existing Development Management Policies		Commentary	Recommendation
		Group comments and amendments to address the lack of clarity identified by the former Economy and Development Select Committee which the Sustainable Tourism SPG has sought to resolve.	Officer Working Group comments and updated national policy guidance and to address the lack of clarity identified by Economy and Development Select Committee which the Sustainable Tourism SPG has sought to resolve.
T3	Golf Courses	Amendments necessary to reflect update national planning policy and Officer Working Group comments and amendments to address the lack of clarity identified by the former Economy and Development Select Committee which the Sustainable Tourism SPG has sought to resolve.	Carry forward as a Development Management Policy in the RLDP with amendments to reflect Officer Working Group comments and updated national policy guidance and to address the lack of clarity identified by Economy and Development Select Committee which the Sustainable Tourism SPG has sought to resolve.
SD1	Renewable Energy	Policy is functioning effectively. Amendments will be necessary to reflect updated national planning policy guidance and the outcome of the Renewable Energy Assessment.	Carry forward as a Development Management Policy in the RLDP with amendments to reflect updated national planning policy guidance and evidence.
SD2	Sustainable Construction and Energy Efficiency	Policy is functioning effectively. Amendments may be necessary to reflect updated national planning policy guidance.	Carry forward as a Development Management Policy in the RLDP with amendments to reflect contextual changes and updated national planning policy guidance.
SD3	Flood Risk	Review report recommends to delete this policy as flood risk considerations are covered by national planning policy.	Delete policy from the RLDP.
SD4	Sustainable Drainage	Policy is functioning effectively. Amendments may be necessary to reflect updated national planning policy guidance and legislation on this issue.	Carry forward as a Development Management Policy in the RLDP with amendments to reflect updated national planning policy guidance and legislation.

Existing Development Management Policies		Commentary	Recommendation
LC1	New Built Development in the Open Countryside	Policy is functioning effectively. Minor amendments may be necessary to reflect Officer Working Group comments.	Carry forward as a Development Management Policy in the RLDP with minor amendments.
LC2	Blaenavon Industrial Landscape World Heritage Site	Policy is functioning effectively. Minor amendments may be necessary to reflect Officer Working comments.	Carry forward as a Development Management Policy in the RLDP with minor amendments.
LC3	Brecon Beacons National Park	Policy is functioning effectively. Minor amendments may be necessary to reflect Officer Working Group comments.	Carry forward as a Development Management Policy in the RLDP with minor amendments.
LC4	Wye Valley AONB	Policy is functioning effectively. Minor amendments may be necessary to reflect Officer Working Group comments.	Carry forward as a Development Management Policy in the RLDP with minor amendments.
LC5	Protection and Enhancement of Landscape Character	Policy is functioning effectively. Minor amendments may necessary to reflect Officer Working Group comments.	Carry forward as a Development Management Policy in the RLDP with minor amendments.
LC6	Green Wedges	This policy and associated boundaries will be amended as necessary to reflect a review of the Green Wedges which will be completed in time for the Deposit Plan to ensure designations are justified and consistent with updated planning policy guidance. An additional policy on South East Wales Green Belt will also be required.	Policy and associated boundaries will be amended and to reflect a review of the Green Wedges and updated planning policy guidance.
GI1	Green Infrastructure	Policy is functioning effectively. Minor amendments may be necessary to reflect updated national planning policy guidance and Officer Working Group Comments. The Adopted Green Infrastructure SPG provides further clarity on the implementation of the	Carry forward as a Development Management Policy in the RLDP with minor amendments.

Existing Development Management Policies		Commentary	Recommendation
		policy which will be amended accordingly and readopted to accompany the RLDP.	
NE1	Nature Conservation and Development	Policy is functioning effectively. Minor amendments may be necessary to reflect changes to the legislative framework, national planning policy guidance and Officer Working Group comments.	Carry forward as a Development Management Policy in the RLDP with minor amendments.
EP1	Amenity and Environmental Protection	Policy functioning effectively. Minor amendments may be necessary to reflect updated national planning policy guidance.	Carry forward as a Development Management Policy in the RLDP with minor amendments.
EP2	Protection of Water Sources and Water Environment	Policy is functioning effectively and continues to work well in the context of the recently arising phosphate water quality issue. Minor amendments may be necessary to reflect updated national planning policy guidance.	Carry forward as a Development Management Policy in the RLDP with minor amendments.
EP3	Lighting	Policy is functioning effectively. Minor amendments may be necessary to reflect Officer Working Group comments.	Carry forward as a Development Management Policy in the RLDP with minor amendments.
EP4	Telecommunications	Policy is functioning effectively. Minor amendments may be required to reflect legislative framework and updated national planning policy guidance.	Carry forward as a Development Management Policy in the RLDP with minor amendments.
EP5	Foul Sewage Disposal	Policy is to be reviewed. Amendments needed to reflect Phosphate issues in the River Usk and River Wye Catchment Areas.	Carry forward as a Development Management Policy in the RLDP with amendments to reflect up to date evidence and phosphate issues in the River Usk and River Wye Catchment Areas.

Existing Development Management Policies		Commentary	Recommendation
W1	Waste Reduction	Limited application. Review Report notes the need to consider whether the policy is required. Policy has strong links to the circular economy objectives. Amendments may be required to reflect updated national planning policy guidance and MCC's climate change agenda.	Carry forward as a Development Management Policy in the RLDP with amendments to reflect contextual and national planning policy guidance.
W2	Waste Recovery Facilities: Household	Limited application. Review Report notes the need to consider whether the policy is required. Principle of policy is considered relevant and necessary, but is adequately covered by the draft Strategic Policy S15 – Sustainable Waste Management set out in the Preferred Strategy (December 2022)	Delete policy as policy objectives are addressed by the draft Strategic Policy S15 – Sustainable Waste Management as set out in the Preferred Strategy (June 2021).
W3	Waste Management Facilities	Policy is functioning effectively. Amendments are required to replace the overarching acceptability of waste management facilities on B2 sites, to list specific sites and reduce the scope of the existing policy.	Carry forward as a Development Management Policy in the RLDP with amendments to replace the overarching acceptance of B2 industrial sites for waste management facilities with a list of specific sites and reduce the scope of the existing policy.
W4	Rural Composting	Policy is functioning effectively.	Carry forward as a Development Management Policy in the RLDP.
W5	Waste Disposal by Landfill or Landraising	Policy functioning effectively. Minor amendments may be required to reflect national planning policy guidance.	Carry forward as a Development Management Policy in the RLDP.
W6	Waste Deposition on Agricultural Land for Agricultural Improvement Purposes	Policy is functioning effectively.	Carry forward as a Development Management Policy in the RLDP.

Existing Development Management Policies		Commentary	Recommendation
M1	Local Building and Walling Stone	Policy is functioning effectively.	Carry forward as a Development Management Policy in the RLDP.
M2	Minerals Safeguarding Areas	Policy is functioning effectively. Minor amendments may be required to reflect the findings of the Regional Technical Statement – 2 nd Revision and associated Mineral Safeguarding Maps.	Carry forward as a Development Management Policy in the RLDP with minor amendments necessary to reflect the updated Regional Technical Statement – 2 nd Revision.
M3	Mineral Site Buffer Zones	Policy is functioning effectively. Amendments may be necessary to reflect the findings of the Regional Technical Statement – 2 nd Revision. Buffer Zone for Livox Quarry requires deletion following a refusal of planning permission to continue mineral extraction.	Carry forward as a Development Management Policy in the RLDP with amendments necessary to reflect the updated Regional Technical Statement 2 nd Revision and planning status changes.
MV1	Proposed Developments and Highway Considerations	Policy is functioning effectively. Amendments may be required to reflect updated national planning policy guidance and to incorporate elements of Policy MV7 – Rear Access/Service Areas, which is recommended to be deleted.	Carry forward as a Development Management Policy in the RLDP with amendments necessary to reflect updated national planning policy guidance and incorporate elements of policy MV7 – Rear Access/Service Areas, which is proposed to be deleted.
MV2	Sustainable Transport Access	Policy is functioning effectively. Amendments may be required to reflect updated national planning policy guidance.	Carry forward as a Development Management Policy in the RLDP with amendments necessary to reflect updated national planning policy guidance.
MV3	Public Rights of Way	Policy is functioning effectively. Minor amendments may be required to reflect the Monmouthshire Countryside Access Draft Improvement Plan – July 2019.	Carry forward as a Development Management Policy in the RLDP with minor amendments to reflect contextual changes.
MV4	Cycleways	Policy is functioning effectively.	Carry forward as a Development Management Policy in the RLDP.

Existing Development Management Policies		Commentary	Recommendation
MV5	Improvements to Public Transport Interchanges and Facilities	Policy has had limited use to date, but the principles remain relevant.	Carry forward as a Development Management Policy in the RLDP.
MV6	Canals and Redundant Rail Routes	Policy principle remains relevant, but has had limited use. Consideration will be given to amendments or combination with another suitable policy.	Carry forward the policy principle, but with consideration to amendments or combination with another suitable policy.
MV7	Rear Access / Service Areas	Policy is functioning effectively but has limited applicability. Consideration will be given to the deletion of the policy and inclusion of its objective to Policy MV1.	Consider deletion of the policy with amendments to Policy MV1 to ensure policy objectives are addressed.
MV8	Rail Freight	Policy principle remains relevant, but has had limited applicability. Consideration will be given to combining policy objectives with another Movement related policy.	Carry forward policy principle, but with consideration to combining with another suitable policy.
MV9	Road Hierarchy	Policy is functioning effectively, but has had limited applicability. Consideration will be given to whether the policy is still required.	Consider deletion of the policy.
MV10	Transport Routes and Schemes	Policy is functioning effectively. Amendments are required to reflect updated Local Transport Plan and Active Travel Act and associated schemes including deleting reference to the M4 relief road protected route and B4245 Magor/Undy bypass.	Carry forward as a Development Management Policy with amendments to reflect the updated Local Travel Plan and Active Travel Act.
DES1	General Design Considerations	Policy is functioning effectively. Amendments are required to reflect contextual changes, updated national planning policy guidance, Officer Working Group comments and	Carry forward as a Development Management Policy with amendments to reflect contextual changes, updated national planning policy guidance, Officer Working Group comments and

Existing Development Management Policies		Commentary	Recommendation
		consideration of the suggestions from Abergavenny Civic Society.	consideration of the suggestions from Abergavenny Civic Society.
DES2	Areas of Amenity Importance	Policy is functioning effectively. Amendments are required to reflect the review of Areas of Amenity Importance which will be completed in time for the Deposit Plan, updated national planning policy guidance on associated standards and associated changes to policy CRF2.	Carry forward as a Development Management Policy with amendments to reflect updated Areas of Amenity Importance Survey and national planning policy guidance.
DES3	Advertisements	Policy is functioning effectively. Amendments may be required to reflect Officer Working Group comments.	Carry forward as a Development Management Policy in the RLDP with amendments and merge with Policy DES4.
DES4	Advance Tourism Signs	Policy is functioning effectively but should be merged with Policy DES3.	Merge with Policy DES3.
HE1**	Development in Conservation Areas	Policy is functioning effectively. Minor amendments may be necessary to reflect Officer Working Group comments.	Carry forward as a Development Management Policy in the RLDP with minor amendments.
HE2**	Alterations to Unlisted Buildings in Conservation Areas	Policy is functioning effectively. Minor amendments may be necessary to reflect Officer Working Group comments.	Carry forward as a Development Management Policy in the RLDP with minor amendments.
HE3**	Design of Shop Fronts in Conservation Areas	Policy is functioning effectively.	Carry forward as a Development Management Policy in the RLDP.
HE4**	Roman Town of Caerwent	Policy is functioning effectively.	Carry forward as a Development Management Policy in the RLDP.

*Officer Working Group discussions refers to issues raised during a series of internal workshops with MCC Officers covering different topic areas. The findings of the workshops fed into the LDP Review Report (March 2018), including Table 2: Review of Development Management Policies.

**Historic Environment Policies to be further reviewed in light of the Historic Environment Act and consideration given to the need for new or amended policies particularly with regard to Buildings of Local Interest and Historic Landscapes.

Appendix 3

Summary of representations received in response to the Preferred Strategy 2022 consultation.

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
<p>General support</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 192</p>	<ul style="list-style-type: none"> • 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 an 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].

<p>Key issues, challenges and opportunities</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 193</p>	<ul style="list-style-type: none"> • 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 1.5°C 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].
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Page 194	<ul style="list-style-type: none"> • 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].
RLDP Vision	<ul style="list-style-type: none"> • 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].

Page 195	<ul style="list-style-type: none"> • 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].
Objective 1 (Economic Growth/ Employment)	<ul style="list-style-type: none"> • 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].

	<ul style="list-style-type: none"> • 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].
Objective 2 (Town and Local Centres)	<ul style="list-style-type: none"> • 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].
Objective 3 (Green Infrastructure, Biodiversity and Landscape)	<ul style="list-style-type: none"> • 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].
Objective 4 (Flood risk)	<ul style="list-style-type: none"> • 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].
Objective 5 (Minerals and Waste)	<ul style="list-style-type: none"> • 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].
Objective 6 (Land)	<ul style="list-style-type: none"> • 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].

	<ul style="list-style-type: none"> 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].
Objective 7 (Natural resources)	<ul style="list-style-type: none"> 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].
Objective 8 (Health and Well-being)	<ul style="list-style-type: none"> 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].
Objective 9 (Demography)	<ul style="list-style-type: none"> 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].

<p>Objective 10 (Housing)</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 198</p>	<ul style="list-style-type: none"> • 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].
<p>Objective 11 (Placemaking)</p>	<ul style="list-style-type: none"> • 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].
<p>Objective 12 (Communities)</p>	<ul style="list-style-type: none"> • 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].

Objective 13 (Rural communities)	<ul style="list-style-type: none"> • 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, not 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].
Objective 14 (Infrastructure)	<ul style="list-style-type: none"> • 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].
Objective 15 (Accessibility)	<ul style="list-style-type: none"> • 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].
Objective 16 (Culture, Heritage and Welsh Language)	<ul style="list-style-type: none"> • 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].
Objective 17 (Climate and Nature Emergency)	<ul style="list-style-type: none"> • 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].

Page 200	<ul style="list-style-type: none"> • 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 1.5°C’ to ‘To strive to pursue policies and action which contribute to the international goal of limiting the increase in global temperatures to 1.5°C’ 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].
Objectives general	<ul style="list-style-type: none"> • 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].
Missing challenges	<ul style="list-style-type: none"> • 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].
Area specific – Chepstow	<ul style="list-style-type: none"> • 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].

Page 201	<ul style="list-style-type: none"> • 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].
Area specific – Severnside	<ul style="list-style-type: none"> • 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].
Area specific – Abergavenny	<ul style="list-style-type: none"> • 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].
Area specific – Monmouth	<ul style="list-style-type: none"> • 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].

	<ul style="list-style-type: none"> 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].
Site specific - other	<ul style="list-style-type: none"> 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].
Promotion of sites	<ul style="list-style-type: none"> 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].
Other	<ul style="list-style-type: none"> 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].

Questions 2, 3, 4 – Do you have any comments on the Preferred Strategy, Policy S1 Growth Strategy, Policy S2 Spatial Distribution of Development – Settlement Hierarchy?

90 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.	<ul style="list-style-type: none"> • 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]

Growth Level is too low	<ul style="list-style-type: none"> 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]
Growth level is too high Page 204	<ul style="list-style-type: none"> 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]
Spatial Distribution	<ul style="list-style-type: none"> 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]

	<ul style="list-style-type: none"> • 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]
Settlement Hierarchy	<ul style="list-style-type: none"> • Little Mill should be recategorized as a Tier 2 Settlement. [MHA]
Strategic Sites/Delivery	<ul style="list-style-type: none"> • 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]
Monmouth Growth	<ul style="list-style-type: none"> • 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]
PS Priorities	<ul style="list-style-type: none"> • 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]

	<ul style="list-style-type: none"> • 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 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 place 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]
Potential failure to deliver core strategy components	<ul style="list-style-type: none"> • 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]
Cross Boundary Issues	<ul style="list-style-type: none"> • FoD keen to work collaboratively to bring about sustainable solutions to cross boundary transport issues. [FoD] • GCC 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]
Flexibility Allowance	<ul style="list-style-type: none"> • 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]
Windfall/Small Site Allowance	<ul style="list-style-type: none"> • 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]

Jobs Growth	<ul style="list-style-type: none"> • 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]
Lacking details/information	<ul style="list-style-type: none"> • 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]
Site Promoted in response to Question 2	<ul style="list-style-type: none"> • 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]

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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	<ul style="list-style-type: none"> • 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].

	<ul style="list-style-type: none"> • Site promoter prides itself on design excellence and providing high quality homes that would align with this policy [Edenstone].
Changes suggested to policy wording	<ul style="list-style-type: none"> • 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]
Support prominence given to GI.	<ul style="list-style-type: none"> • Welcome proposals for placemaking and the prominence given to Green Infrastructure in design considerations [Abergavenny Town Council].
Development to be built to net zero carbon	<ul style="list-style-type: none"> • Disappointed there is no commitment for future development to build to net zero carbon to meet the declared climate crisis objectives [Abergavenny Town Council].
Question whether approach to design should be led by GI	<ul style="list-style-type: none"> • 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].
Terms used	<ul style="list-style-type: none"> • 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]
Impact on viability	<ul style="list-style-type: none"> • 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].
Other	<ul style="list-style-type: none"> • 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 give 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].
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	<ul style="list-style-type: none"> • 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]
Definition/viability	<ul style="list-style-type: none"> • 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 are 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]
Further details/evidence needed	<ul style="list-style-type: none"> • 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 assessed at a local/site level. [NRW]
Site Specific	<ul style="list-style-type: none"> • 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]

	<ul style="list-style-type: none"> 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]
RLPD contrary to policy	<ul style="list-style-type: none"> 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]
General	<ul style="list-style-type: none"> 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]

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	<ul style="list-style-type: none"> 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].
Suggested changes to wording	<ul style="list-style-type: none"> 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].
Broadband and strategic utilities	<ul style="list-style-type: none"> 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].

Cultural facilities and strategic utilities	<ul style="list-style-type: none"> 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].
Road infrastructure	<ul style="list-style-type: none"> 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].
Health infrastructure	<ul style="list-style-type: none"> 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].
Education	<ul style="list-style-type: none"> Additional capacity in schools must be confidently delivered before or with any major new developments [Private individual x 1].
Infrastructure Plan	<ul style="list-style-type: none"> 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].
Management companies	<ul style="list-style-type: none"> 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].
Adoption of infrastructure	<ul style="list-style-type: none"> Question whether wording in policy mean that in no circumstance will the Council adopt any new infrastructure [Home Builders Federation].
Affordable Housing	<ul style="list-style-type: none"> 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].
Viability	<ul style="list-style-type: none"> Welcomes the commitment 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].
Infrastructure should come first	<ul style="list-style-type: none"> 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].

	<ul style="list-style-type: none"> • 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 [Private individuals x 3].
Area specific	<ul style="list-style-type: none"> • 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].
Other	<ul style="list-style-type: none"> • 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].

	<ul style="list-style-type: none"> 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].
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Question 8 – Do you have any comments on Strategic Policy S6 Affordable Homes?

50 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	<ul style="list-style-type: none"> 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

	<p>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].</p> <ul style="list-style-type: none"> • 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].
<p>Provision of 50% Affordable Homes</p> <p>Page 214</p>	<ul style="list-style-type: none"> • 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 ghettos 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].

	<ul style="list-style-type: none"> • 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].
Housing requirement	<ul style="list-style-type: none"> • 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].
Local Housing Market Assessment (LHMA)	<ul style="list-style-type: none"> • 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].
Land values and viability	<ul style="list-style-type: none"> • 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].

Tenure neutral approach	<ul style="list-style-type: none"> 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].
Lack of site in Monmouth/north of the County	<ul style="list-style-type: none"> 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].
Site specific	<ul style="list-style-type: none"> 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].
Bungalows	<ul style="list-style-type: none"> 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].
Definition of affordable housing	<ul style="list-style-type: none"> 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].
Other	<ul style="list-style-type: none"> 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 [Llanybi 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].

Question 9 – Do you have any comments on Strategic Policy S7 Preferred Strategic Site allocation?

A range of comments have been made on the 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 locations: Question 10 (Abergavenny East), Question 11 (Bayfield Chepstow) and Questions 12 (Caldicot East), as well as comments on these sites under the Candidate Site 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. 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 Page 217	<ul style="list-style-type: none"> • 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 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 A365. The precise numbers that the strategic sites need to provide should be considered in relation to the number of housing 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].
Caldicot East	<ul style="list-style-type: none"> • 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].

	<ul style="list-style-type: none"> • 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].
Bayfield /Chepstow	<ul style="list-style-type: none"> • 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 the 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 its views from the public vantage points are retained [Private Individual x1].
Over reliance on Strategic sites Page 218	<ul style="list-style-type: none"> • 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 settlement and sustainable rural settlement 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].
Deliverability	<ul style="list-style-type: none"> • 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].
Infrastructure	<ul style="list-style-type: none"> • 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].

	<ul style="list-style-type: none"> • Development should be largely in the North of the County as the Heads of the Valleys Road infrastructure has been improved [Cllr Louise Brown].
Overdevelopment /growth too high	<ul style="list-style-type: none"> • 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].
Spatial Distribution	<ul style="list-style-type: none"> • 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].
Urban Sprawl	<ul style="list-style-type: none"> • Candidate Sites are grouped too closely together so current outlying villages identities and sense of community lost [Private Individual x1].
Limited Information	<ul style="list-style-type: none"> • 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].
Monmouth	<ul style="list-style-type: none"> • 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].
Brownfield Sites	<ul style="list-style-type: none"> • 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].
Phosphates	<ul style="list-style-type: none"> • 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].
Green Infrastructure	<ul style="list-style-type: none"> • Essential that site selection and development design are informed by GI considerations [NRW].
Landscape	<ul style="list-style-type: none"> • 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].
Protected Species/Sites	<ul style="list-style-type: none"> • 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].
SPZs	<ul style="list-style-type: none"> • Any development sites in SPZs need to connect to the public sewer network [Usk Civic Society].

Foul Drainage	<ul style="list-style-type: none"> • 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].
Health & Wellbeing	<ul style="list-style-type: none"> • 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].
Minerals & Waste	<ul style="list-style-type: none"> • 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].
National Grid Capacity	<ul style="list-style-type: none"> • 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].
Net Zero Carbon Ready	<ul style="list-style-type: none"> • Should be built to the highest environmental standards and not the minimum standards to achieve 'net carbon ready' [Private Individual x1].
Collaborative Working	<ul style="list-style-type: none"> • Welcome collaboration that considers the cumulative impact of development [Torfaen Council].
General /other	<ul style="list-style-type: none"> • Land at St Lawrence Lane should be included within the RLDP as a strategic site allocation [Vistry]. • South west of Llanfoist if 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 incapable 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].

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 20 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	<ul style="list-style-type: none"> Accept site has potential to provide a mixed development subject to guarantees that the considerable infrastructure challenges are fully costed and delivered. [Abergavenny Town Council, SOUL] 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]
Objection Comments	<ul style="list-style-type: none"> No certainty that the site will be able to deliver the quantum of homes that the RLDP 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]
Infrastructure	<ul style="list-style-type: none"> 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]
Foot bridge/A465 crossing	<ul style="list-style-type: none"> 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]
Masterplanning/ Assessments	<ul style="list-style-type: none"> 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]

	<ul style="list-style-type: none"> 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]
Sites promoted in response to question 20	<ul style="list-style-type: none"> 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]

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 in relation to improvements of services, such as GP, schools and community services and improvements to highway infrastructure. Many responses indicated that Chepstow already experiences problems with congestion and traffic, particularly at High Beech Roundabout and there is also the concern and consideration of cumulative impact with proposed development of circa 1000 homes at Severnside (CS0087& CS0251) as well as proposed new development in bordering England Counties such as 2,460 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 location, there was an overarching concern in relation to impact the proposal would have upon the setting of the adjacent Wye Valley Area of Outstanding Natural Beauty (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 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 place-making and master-planning process to be undertaken prior to allocation. However, comments have challenged whether this will be viable, and they will 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	<ul style="list-style-type: none"> 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].
Housing growth	<ul style="list-style-type: none"> 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].

	<ul style="list-style-type: none"> 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].
Commitments	<ul style="list-style-type: none"> 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].
Place-making	<ul style="list-style-type: none"> Well integrated with the existing community and has strong placemaking credentials to contribute towards the vibrancy of Chepstow. It will deliver: <ul style="list-style-type: none"> 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: <ul style="list-style-type: none"> 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].
Highway safety /Active Travel	<ul style="list-style-type: none"> 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].
Public water supply and sewerage	<ul style="list-style-type: none"> There are no issue 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].

network/treatment works	
'Net Zero Carbon Ready Homes'	<ul style="list-style-type: none"> 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].
50% affordable homes	<ul style="list-style-type: none"> 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].
Infrastructure (Services)	<ul style="list-style-type: none"> 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].
Infrastructure (Highways)	<ul style="list-style-type: none"> 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].

	<ul style="list-style-type: none"> Decision to include Bayfield must take into account the demonstrated Chepstow WeITAG Stage 1) inability of existing road infrastructure to cope with traffic growth [Private Individual x2].
Cumulative impact	<ul style="list-style-type: none"> 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].
Air Quality/Pollution	<ul style="list-style-type: none"> 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 of even progress towards a solution is being advanced by either the Welsh Government or the Council [Cllr Christopher Edwards, Private Individual x2].
Green Belt	<ul style="list-style-type: none"> 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].
Agricultural land	<ul style="list-style-type: none"> 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].
Landscape /AONB	<ul style="list-style-type: none"> Within close proximity to Wye Valley Area of Outstanding Natural Beauty (AONB). A Landscape Sensitivity Assessment (LSA) would help inform your Authority's decision on whether to progress this site. If progressed please consider informing 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 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].

	<ul style="list-style-type: none"> 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].
Heritage	<ul style="list-style-type: none"> 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].
Ecology	<ul style="list-style-type: none"> 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].
SAC – containment /commuting	<ul style="list-style-type: none"> 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].
Forest of Dean (FOD) /South Gloucester	<ul style="list-style-type: none"> 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].
Public consultation	<ul style="list-style-type: none"> 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].
Mounton Road (CS0165)	<ul style="list-style-type: none"> 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].

	<ul style="list-style-type: none"> CS0165 does not impact on the 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].
Planning History	<ul style="list-style-type: none"> Given the history of site CS0098 with previous refusals for development on account of the detriment caused to the 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].
Insufficient Information	<ul style="list-style-type: none"> 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].
General/ Other	<ul style="list-style-type: none"> 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 subsidised council tax payment [Private Individual x1].
<p>Question 12 – Do you have any comments on Strategic Policy S7 Preferred Strategic Site Allocations: c) Caldicot East?</p> <p>46 organisations or members of the public submitted a response to question 12.</p> <p>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.</p>	
Key Theme	Summary of Points Raised
Support policy/site	<ul style="list-style-type: none"> Strongly support the allocation of Caldicot East and the contribution it can make to the RLDP. Provide 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].
Object to policy/site	<ul style="list-style-type: none"> 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].

	<ul style="list-style-type: none"> • 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 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]. • State 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].
Number of dwellings proposed/ deliverability	<ul style="list-style-type: none"> • 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. Promote their own sites considered elsewhere in the summary of representations [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].
Strategic Infrastructure	<ul style="list-style-type: none"> • 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].
Green Belt	<ul style="list-style-type: none"> • 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].
Proximity to M4	<ul style="list-style-type: none"> • 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 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].

20-minute neighbourhood	<ul style="list-style-type: none"> Suggest majority of site is located outside the 20-minute neighbourhood [Hallam Land Management Ltd., Taylor Wimpey, Edenstone Homes & Bellway Homes].
Masterplanning/ Assessments	<ul style="list-style-type: none"> Provide detail on proximity to designations that need to be considered as part of the development along with potential solutions on how to incorporate in the scheme are provided. Recommendation of opportunities in relation to design, ecology, drainage and natural resources also provided to inform masterplanning of the site [Natural Resources Wales].
Other	<ul style="list-style-type: none"> 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].

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.	<ul style="list-style-type: none"> 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]
Should consider planning considerations	<ul style="list-style-type: none"> Land should not be made available without the usual GI, public open space and amenity land protections, highway, and planning considerations. [Cllr Louise Brown]
Object to G&T provision	<ul style="list-style-type: none"> Object to policy and allocating Gypsy and Traveller site(s). [Private Individuals x 3]

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. 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
Sustainable transport	<ul style="list-style-type: none"> • 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]. • Support the objective, however, how will investment in low carbon transport infrastructure enable more people to walk and cycle [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]. • 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 network have active travel shortcomings [Cllr Christopher Edwards, Private Individual x2]. • Respectfully suggest that the phrasing 'must' is substituted with 'should provide appropriate measures subject to site-specific considerations' [Redrow Homes Limited]. • 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]. • 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].
Active travel	<ul style="list-style-type: none"> • 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 measurements between the howl of the narrow southern band of development [Cllr Louise Brown]. • No cycle paths joining up Severnside (many cyclists killed/injured on the B424) [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]. •
National Development Framework	<ul style="list-style-type: none"> • 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].
Rural nature of Monmouthshire	<ul style="list-style-type: none"> • 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]. • 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],

	<ul style="list-style-type: none"> • Proportionate growth in smaller settlement 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 discourage the car [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].
Cross-boundary impacts	<ul style="list-style-type: none"> • 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 stagger of 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].
Parking standards Page 231	<ul style="list-style-type: none"> • 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-haring, 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].
Public Transport	<ul style="list-style-type: none"> • Public Transport provision is poor in Monmouthshire [Private Individual x2]. • Public Transport alternative 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].

	<ul style="list-style-type: none"> • 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].
Home working	<ul style="list-style-type: none"> • 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].
Local Transport Plan (LTP)	<ul style="list-style-type: none"> • The LTP is not yet available to comment [Abergavenny & Crickhowell Friends of the Earth, Usk Civic Society]
Electric Vehicle Charging (ULEVs)	<ul style="list-style-type: none"> • Support the principle however viability of smaller schemes will be an important consideration to the implementation of this policy [Monmouthshire Housing Association, Edenstone, Private Individual x2].
Grid capacity	<ul style="list-style-type: none"> • 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].
Minerals & Waste	<ul style="list-style-type: none"> • 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].
Strategic Sites	<ul style="list-style-type: none"> • 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 linked 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].
Highway design	<ul style="list-style-type: none"> • Require raised kerbs at bus stops [Disability Advice Project].
General/Other	<ul style="list-style-type: none"> • The final bullet point and the accompanying text is unclear. 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]. • Grove Farm Care village - co-locating living, care, medical and social facilities together provide 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].]

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	<ul style="list-style-type: none"> • 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].
Area specific comments in relation to town, local and neighbourhood centres	<ul style="list-style-type: none"> • 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].
Town centre first approach	<ul style="list-style-type: none"> • 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].
Policy wording and context	<ul style="list-style-type: none"> • 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].
Other	<ul style="list-style-type: none"> • 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].

	<ul style="list-style-type: none"> • 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].
<p>Question 16 – Do you have any comments on Strategic Policy S11 Community and Recreation Facilities?</p> <p>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.</p> <p>The key themes raised are set out below:</p>	
Key Theme	Summary of Points Raised
Support policy	<ul style="list-style-type: none"> • Support this policy and the emphasis it places on protecting and retaining value facilities. Para 5.57 confirms to include buildings used for cultural purposes we suggest minor addition to include theatres on list of examples [Theatres Trust].
Provision Integral to new proposals	<ul style="list-style-type: none"> • 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].
Suggested changes to policy/wording	<ul style="list-style-type: none"> • 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].
Public Open Space	<ul style="list-style-type: none"> • 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].
Allotments	<ul style="list-style-type: none"> • Allocation for allotments and community growing projects would be welcomes [Abergavenny Town Council].
Rural facilities	<ul style="list-style-type: none"> • 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].
Other	<ul style="list-style-type: none"> • 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].

	<ul style="list-style-type: none"> 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].
<p>Question 17 – Do you have any comments on Strategic Policy S12 – Employment Sites Provision</p> <p>26 organisations or members of the public submitted a response to question 17.</p> <p>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.</p>	
Key Theme	Summary of Points Raised
Allocations	<ul style="list-style-type: none"> 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]
Jobs Provision	<ul style="list-style-type: none"> 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 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]
Site Specific	<ul style="list-style-type: none"> 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]
General	<ul style="list-style-type: none"> 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]

Site promoted in response to question 17	<ul style="list-style-type: none"> • 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]
<p>Question 18 – Do you have any comments on Strategic Policy S13 Rural Enterprise?</p> <p>17 organisations or members of the public submitted a response to Question 18 –Rural Enterprise. Comments were supportive of the policy with some comments refer to policy wording to be tighter to protect open countryside and Monmouthshire’s valuable farmland. Other comments are 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.</p> <p>The key themes raised are set out below:</p>	
Key Theme	Summary of Points Raised
Supportive of diversification where there is clear link to local communities	<ul style="list-style-type: none"> • 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 corridors 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].
Disagree for new build	<ul style="list-style-type: none"> • Agree to the re-use of existing buildings but disagree to new buildings/sites [Private Individual x1].
Term definitions	<ul style="list-style-type: none"> • 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].
Need for local policy for small holdings/ local production/ housing to support small holding food production	<ul style="list-style-type: none"> • Supportive to see produce grown and distributed locally and the range of products and rural innovations extended to reduce the reliance 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].

Employment uses limited to rural diversification	<ul style="list-style-type: none"> Whilst appreciated that his 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].
Rewording suggestions	<ul style="list-style-type: none"> 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].
Farmland to be protected	<ul style="list-style-type: none"> Value farmland [Private Individual x1]. Our rural economy must be protected, and the development of agricultural land must not be allowed [Private Individual x1].
Other	<ul style="list-style-type: none"> The housing development in Usk runs contrary to all factors mentioned [Private Individual x1].

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	<ul style="list-style-type: none"> 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].
Suggests rewording to policy	<ul style="list-style-type: none"> Reworded to ensure tourist facilities are located in areas that have the necessary facilities include toilets, parking and highway capacity [Cllr Louise Brown].
Opportunity for marketing of tourist sites	<ul style="list-style-type: none"> 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].
Adverse impact on landscape	<ul style="list-style-type: none"> 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].
Other	<ul style="list-style-type: none"> Visitor economy is minimal in Chepstow bar the races. Chepstow has lost its attraction and the points raised here are vague [Private Individual x1].

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	<ul style="list-style-type: none"> 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 storage and collection of waste or the unauthorised dumping of materials on sites without planning permission will be subject to enforcement proceedings. [Cllr Louise Brown]
Operational Issues	<ul style="list-style-type: none"> 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]
<p>Question 21 – Do you have any comments on Strategic Policy S16 – Minerals?</p> <p>6 organisations or members of the public submitted a response to question 21.</p> <p>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.</p>	
Key Theme	Summary of Points Raised
Mineral Products Association (MPA) comments	<ul style="list-style-type: none"> 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]
Coal Authority Development Risk Plans	<ul style="list-style-type: none"> 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]
Regional Collaboration	<ul style="list-style-type: none"> • 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]
General	<ul style="list-style-type: none"> • Add reference to national and regional policy requirements to the policy wording for clarity. [Cllr Louise Brown]

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	<ul style="list-style-type: none"> • Supports the principle of Policy S17 [Vistry]. • Principle supports 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]. •
Suggests word change	<ul style="list-style-type: none"> • 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 is 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].
Biodiversity Gain	<ul style="list-style-type: none"> • 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].
SuDS	<ul style="list-style-type: none"> • 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].

Landscape	<ul style="list-style-type: none"> 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].
Ecosystem resilience	<ul style="list-style-type: none"> 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].
Water environment	<ul style="list-style-type: none"> 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].
Green Belt/Green Wedge	<ul style="list-style-type: none"> Disappointing there is not mention of creating a green belt/wedge when allocating candidate sites [Abergavenny Town Council].
Canals	<ul style="list-style-type: none"> 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].
Dark skies/light pollution	<ul style="list-style-type: none"> Suggest policies relating to Tranquillity and Dark skies/light pollution are developed alongside S17 through a Development Management policy [NRW].
Green Belt/Green Wedge	<ul style="list-style-type: none"> 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 Green Wedge Review which should have been published alongside the Preferred Strategy to inform where the proposed level of growth will go [Private Individual x1].
Other	<ul style="list-style-type: none"> 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].

Question 23 – Do you agree with the recommendations with regard to the existing Adopted LDP Development Management Policies?

35 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	<ul style="list-style-type: none"> 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].
Housing	<ul style="list-style-type: none"> 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 PPW11 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].
Enterprise and Employment	<ul style="list-style-type: none"> 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].
Rural Economy	<ul style="list-style-type: none"> 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].
Retail	<ul style="list-style-type: none"> Suggest RET1 and RET2 policies need to be consistent with Placemaking Strategies proposed under S10 [Abergavenny Town Council and Abergavenny & District Society].
Landscape	<ul style="list-style-type: none"> 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].
Renewable Energy & Energy Efficiency	<ul style="list-style-type: none"> State SD1 and SD2 need greater commitment to deliver this policy in the RLDP to meet S17 [Abergavenny Town Council].

<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 24/22</p>	<p>Flooding</p> <ul style="list-style-type: none"> 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]
	<p>Movement</p> <ul style="list-style-type: none"> Supports the retention of MV1 (proposed developments and highway considerations) and the intention to update it in line with PPW11 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].
	<p>Historic Environment</p> <ul style="list-style-type: none"> 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].
	<p>Community Facilities</p> <ul style="list-style-type: none"> 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].
	<p>Green Infrastructure</p> <ul style="list-style-type: none"> 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].
	<p>Waste</p> <ul style="list-style-type: none"> 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].
	<p>Other</p> <ul style="list-style-type: none"> Suggest there isn't enough detail in the table in order to provide comment as no supporting documentation [Private individual x 2].

Question 24 – Do you have any 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	<ul style="list-style-type: none"> 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].
Housing mix	<ul style="list-style-type: none"> The suggestion that the Council are going to dictate private market mix is not supported [Redrow].
Net zero carbon ready	<ul style="list-style-type: none"> The Council need to define the term 'net zero carbon ready' homes [Redrow].
Green Belt/ Green Wedge	<ul style="list-style-type: none"> 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].
Climate Emergency	<ul style="list-style-type: none"> There is a lot in the Preferred Strategy that conflicts with the Climate and Ecological emergencies [Private Individual x1].
Infrastructure	<ul style="list-style-type: none"> Community facilities are currently at saturation and there is little community spirit [Private Individual x1].
Green Infrastructure	<ul style="list-style-type: none"> There is no cross reference to the MCC Green Infrastructure Plan [Abergavenny Town Council].
Water Environment/Phosphates	<ul style="list-style-type: none"> 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].
Designated Sites	<ul style="list-style-type: none"> 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].
Plan Delivery/ timeline	<ul style="list-style-type: none"> 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 20233 with associated amendments to the housing requirement [Edenstone].
Collaborative working	<ul style="list-style-type: none"> 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].
Suggestions	<ul style="list-style-type: none"> 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 plans strategy has changed from the previous strategy [HBF].

	<ul style="list-style-type: none"> 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].
Candidate Sites	<ul style="list-style-type: none"> 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].
Candidate Sites for Protection	<ul style="list-style-type: none"> The criteria for assessment for protection does not exist. Concerned that sites for protection are now disadvantage compared with those for development [SOUL].
New Settlement	<ul style="list-style-type: none"> 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].
Chepstow	<ul style="list-style-type: none"> 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].
Reference errors	<ul style="list-style-type: none"> Should reference to Gloucestershire Council in paragraph 2.2 be GCC? [Gloucestershire County Council].
Consultation process	<ul style="list-style-type: none"> 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].
Other	<ul style="list-style-type: none"> 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].

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	<ul style="list-style-type: none"> 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].
No effect	<ul style="list-style-type: none"> 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].
Not relevant	<ul style="list-style-type: none"> 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]
Co-operative and community led housing	<ul style="list-style-type: none"> 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].
Other	<ul style="list-style-type: none"> 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].
Site promotion	<ul style="list-style-type: none"> 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].

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	<ul style="list-style-type: none"> 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].

Cymraeg 2050, Welsh Language Measure and Strategy	<ul style="list-style-type: none"> 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)]. 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].
Welsh Language Impact Assessment	<ul style="list-style-type: none"> 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].
Site promotion	<ul style="list-style-type: none"> 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].

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	<ul style="list-style-type: none"> 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].
Affordable housing	<ul style="list-style-type: none"> 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].
Economy and employment	<ul style="list-style-type: none"> 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]
Climate change	<ul style="list-style-type: none"> 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].
Historic Environment	<ul style="list-style-type: none"> 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].

Public transport	<ul style="list-style-type: none"> Suggest references to bus services should be treated with caution as they are particularly liable to change [Abergavenny & District Civic Society].
Welsh Language	<ul style="list-style-type: none"> 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].
Agricultural Land	<ul style="list-style-type: none"> 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].
Green Belt	<ul style="list-style-type: none"> 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].
Site specific - Abergavenny	<ul style="list-style-type: none"> 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].
Site specific – Caldicot	<ul style="list-style-type: none"> 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].
Site specific - Chepstow	<ul style="list-style-type: none"> 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].

Area specific - Monmouth	<ul style="list-style-type: none"> Support the ISA findings that recognise the significance of Monmouth as a Primary Settlement [Vistry Group & Private individual x 1].
Appendix 1 - Review of Plans, Policies, Programmes and Strategies	<ul style="list-style-type: none"> 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].
Promotion of sites	<ul style="list-style-type: none"> 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 Mounon 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].
Other	<ul style="list-style-type: none"> Suggest the ISA adds little value to the plan-making process [Abergavenny & District Civic Society].

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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	<ul style="list-style-type: none"> 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]
Mitigation Strategies	<ul style="list-style-type: none"> 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]

Lacking information	<ul style="list-style-type: none"> • Frequent references to that without detailed information on proposals they cannot be assessed. Detail will not be available till 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]
Phosphates	<ul style="list-style-type: none"> • 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]
Sites promoted in response to question 28	<ul style="list-style-type: none"> • 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]

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Appendix 4

Candidate Site Register Summary of Representations

Strategic Sites

Abergavenny		
Candidate Site: CS0213 Abergavenny East	Responder:	
<p>Summary of Main Issues Raised:</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 252</p>	<ol style="list-style-type: none"> 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. <p><i>General support for the site:</i></p> <ol style="list-style-type: none"> 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: <ul style="list-style-type: none"> • 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 it's 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. 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. <p><i>General objection to the site:</i></p>	<ol style="list-style-type: none"> 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 18. 3 Private Individuals 19. 1 Private Individual 20. 1 Private Individual 21. 1 Private Individual 22. 1 Private Individual

	<p>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.</p> <p>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.</p> <p>16. Concern re the slope of the site and the difficulties this will pose for development.</p> <p>17. Concern re run off water from the site and the potential risk of flooding this poses to the railway line.</p> <p>18. Concern re the potential increase in traffic and the ability of the road network to cope.</p> <p>19. Concern re lack of potential Active Travel solutions due to the railway line and A465 as well as the slope of the site.</p> <p>20. Concern whether the site would be connected to the main sewage system or would require it's own treatment plant.</p> <p>21. Concern re the power supply to the area being able to cope with new housing being all electric.</p> <p>22. General concerns re local services and employment being sufficient to cater for a site this size.</p>	
Chepstow		
Candidate Site: CS0165 Land at Mouton Road, Chepstow		Representor:
<p>Summary of Main Issues Raised:</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 253</p>	<ol style="list-style-type: none"> 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. 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. 	<ol style="list-style-type: none"> 1. Glamorgan Gwent Archaeological Trust Ltd 2. Chepstow Town Council 3. Chepstow Town Council 4. Cllr Louise Brown plus 3 Private Individuals 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

Page 254	<p>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.</p> <p>16. Concerns that Chepstow is a Designated Air Quality Management Area with high, potentially illegal, levels of air pollution within Chepstow (contrary to Wellbeing of Future Generations Act).</p> <p>17. Development in Gloucestershire, and the wider community, will impact traffic levels in Chepstow and demand for services.</p> <p>18. A responder feels that access to the site will be challenging and require extensive remodelling of the Highbeech area.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>22. Concerns that there is no provision for safe walking and Active Travel routes.</p> <p>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.</p> <p>24. Concerns regarding lack of provision of formal and informal open spaces and Green Infrastructure onsite.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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%.</p>	<p>16. Mathern Community Council plus 10 Private Individuals</p> <p>17. 3 Private Individuals</p> <p>18. 1 Private Individual</p> <p>19. Mathern Community Council Cllr Louise Brown plus 15 Private Individuals</p> <p>20. 6 Private Individuals</p> <p>21. 7 Private individuals</p> <p>22. 3 Private Individuals</p> <p>23. Mathern Community Council plus 2 Private Individuals</p> <p>24. 3 Private Individuals</p> <p>25. 2 Private Individuals</p> <p>26. 3 Private Individuals</p> <p>27. 6 Private Individuals</p> <p>28. 1 Private Individual</p> <p>29. 1 Private Individual</p> <p>30. 4 Private Individuals</p> <p>31. 2 Private Individuals</p>
Monmouth		
Candidate Site: CS0270 Leasbrook (Land north of Dixton Road)		Representor:
	No responses received	

Severnside

Candidate Site: CS0087 Showground, Caldicot

Representor:

Summary
of Main
Issues
Raised:

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 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

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
16. 1 Private Individual
17. 1 Private Individual
18. 1 Private Individual
19. Edenstone
20. Taylor Wimpey PLC (Savills)

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.
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 that 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.

Page 258	<ul style="list-style-type: none"> • 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. <p>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.</p> <ul style="list-style-type: none"> • 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. <p>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.</p>	
Candidate Site: CS0251 Land at Bradbury Farm, Crick		Representor:
Summary of Main Issues Raised:	<ol style="list-style-type: none"> 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. <ul style="list-style-type: none"> • The landscape of the Showground is more sensitive to residential development than that of the Land South of Newport Road, Magor. 	<ol style="list-style-type: none"> 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

Page 259	<ul style="list-style-type: none"> • 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. <p>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.</p> <ul style="list-style-type: none"> • 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. <p>5. Responders require clear evidence of where S106 money will be invested upfront and also evidenced on delivery.</p> <p>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.</p> <p>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</p>	<p>7. Portskewett Community Council plus 18 Private Individuals</p> <p>8. Portskewett Community Council plus 18 Private Individuals</p> <p>9. 5 Private Individuals</p> <p>10. Portskewett Community Council plus 14 Private Individuals</p> <p>11. 13 Private Individuals</p> <p>12. Portskewett Community Council plus 10 Private Individuals</p> <p>13. 5 Private Individuals</p> <p>14. Portskewett Community Council plus 3 Private Individuals</p> <p>15. 2 Private Individuals</p> <p>16. 4 Private Individuals</p> <p>17. 1 Private Individual</p> <p>18. 1 Private Individual</p> <p>19. 2 Private Individuals</p> <p>20. 1 Private Individual</p> <p>21. 1 Private Individual</p>
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- 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 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 that 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.	
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Primary Settlements

Abergavenny & Llanfoist

Candidate Site: CS0056 South Brecon Road, Abergavenny		Responder:
<p>Summary of Main Issues Raised:</p> <p>Page 262</p>	<ol style="list-style-type: none"> 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. 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. 	<ol style="list-style-type: none"> 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, Abergavenny Transition Town 5. Abergavenny & District Civic Society 6. Abergavenny Transition Town 7. Private Individual x 1
Candidate Site: CS0094 Penlanlas Farm, Abergavenny		Responder:
<p>Summary of Main Issues Raised:</p>	<ol style="list-style-type: none"> 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. 	<ol style="list-style-type: none"> 1. Abergavenny Town Council, Abergavenny & District Civic Society, Abergavenny Transition Town 2. Abergavenny Town Council, Abergavenny & District Civic Society, Abergavenny Transition Town

	6. Glamorgan Gwent Archaeological Trust Ltd assess the site as Green - No recorded or known archaeological or historic environment issues.	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
Candidate Site: CS0108 North Hillgrove Avenue, Abergavenny		Responder:
Summary of Main Issues Raised: Page 263	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

Candidate Site: CS0128 Land at Chapel Farm, Abergavenny		Responder:
Summary of Main Issues Raised:	<ol style="list-style-type: none"> 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 SINCE 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. 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. 	<ol style="list-style-type: none"> 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 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
Candidate Site: CS0161 Land north of Hillside, Abergavenny		Responder:
Summary of Main Issues Raised: CS5	<ol style="list-style-type: none"> 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. 	<ol style="list-style-type: none"> 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

Candidate Site: CS0164 Land adjacent to Red Barn Farm (RBF1)		Responder:
<p>Summary of Main Issues Raised:</p>	<ol style="list-style-type: none"> 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. 	<ol style="list-style-type: none"> 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
Candidate Site: CS0174 Nantgavenny Lane, Abergavenny		Responder:
Summary of Main Issues Raised:	SITE FILTERED OUT 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 SINCE 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
Candidate Site: CS0178 Abergavenny Workhouse		Responder:
Summary of Main Issues Raised:	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

Candidate Site: CS0185 West of Glebe Cottage, Abergavenny		Responder:
Summary of Main Issues Raised:	<ol style="list-style-type: none"> 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. 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. 	<ol style="list-style-type: none"> 1. Glamorgan Gwent Archaeological Trust Ltd 2. Abergavenny Town Council, Abergavenny & District Civic Society 3. Abergavenny & District Civic Society 4. Abergavenny Transition Town
Candidate Site: CS0192 Old Hereford Road, Abergavenny		Responder:
Summary of Main Issues Raised:	<ol style="list-style-type: none"> 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: <ul style="list-style-type: none"> • 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. 	<ol style="list-style-type: none"> 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
Candidate Site: CS0220 Ross Road, Abergavenny		Responder:
Summary of Main Issues Raised:	<ol style="list-style-type: none"> 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. 	<ol style="list-style-type: none"> 1. Glamorgan Gwent Archaeological Trust Ltd 2. Abergavenny Town Council, Abergavenny &

Page 269	<ol style="list-style-type: none"> 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. 	<ol style="list-style-type: none"> 3. District Civic Society, plus 8 Private Individuals 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
Candidate Site: CS0247 Coopers III, Llanfoist	Responder:	
Summary of Main Issues Raised:	<ol style="list-style-type: none"> 1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red. The HER notes earthworks, agricultural features and boundaries. <i>No objection in principle</i> 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. 	<ol style="list-style-type: none"> 1. Glamorgan Gwent Archaeological Trust Ltd 2. Abergavenny & District Civic Society 3. Abergavenny & District Civic Society,

	<ol style="list-style-type: none"> 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: <ul style="list-style-type: none"> • 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. 	<ol style="list-style-type: none"> 4. Abergavenny & District Civic Society 5. Abergavenny & District Civic Society 6. Johnsey Estates UK
Candidate Site: CS0248 Adj Llanfoist Primary School (Whole Site)		Responder:
<p>Summary of Main Issues Raised:</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 270</p>	<ol style="list-style-type: none"> 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. 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. 	<ol style="list-style-type: none"> 1. Glamorgan Gwent Archaeological Trust Ltd 2. Abergavenny & District Civic Society, Abergavenny Transition Town 3. Abergavenny & District Civic Society 4. Abergavenny & District Civic Society, Abergavenny Transition Town
Candidate Site: CS0249 Red Barn Farm (RFB2), Abergavenny		Responder:
<p>Summary of Main Issues Raised:</p>	<ol style="list-style-type: none"> 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. 	<ol style="list-style-type: none"> 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

	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.	7. Abergavenny Transition Town 8. SEWRIGS group
Candidate Site: CS0250 Land at Evesham Nurseries, Llanfoist		Responder:
Summary of Main Issues Raised:	<ol style="list-style-type: none"> 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 site, 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: <ul style="list-style-type: none"> • 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. 	<ol style="list-style-type: none"> 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
Candidate Site: CS0263 Adj Llanfoist Fawr Primary School		Responder:
Summary of Main	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

Issues Raised:	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.	2. Abergavenny & District Civic Society, Abergavenny Transition Town
Candidate Site: CS0264 Land north of St Teilos, Abergavenny		Responder:
Summary of Main Issues Raised:	<ol style="list-style-type: none"> 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. 	<ol style="list-style-type: none"> 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
Candidate Site: CS0265 Tredilion Park, Abergavenny		Responder:
Summary of Main Issues Raised:	<ol style="list-style-type: none"> 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. 	<ol style="list-style-type: none"> 1. Glamorgan Gwent Archaeological Trust Ltd 2. Abergavenny & District Civic Society, Abergavenny Transition Town, Sore Group
Candidate Site: CS0266 Land at Nantgavenny Business Park, Abergavenny		Responder:
Summary of Main Issues Raised:	<ol style="list-style-type: none"> 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. 	<ol style="list-style-type: none"> 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
Candidate Site: CS0267 Waterloo Court, Llanfoist		Responder:
Summary of Main Issues Raised:	<ol style="list-style-type: none"> 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. 	<ol style="list-style-type: none"> 1. Glamorgan Gwent Archaeological Trust Ltd 2. Abergavenny & District Civic Society, Abergavenny Transition Town, SOUL
Candidate Site: CS0268 Westgate Gardens, Abergavenny		Responder:
Summary of Main Issues Raised:	<ol style="list-style-type: none"> 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. 	<ol style="list-style-type: none"> 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
Candidate Site: CS0269 Land at Grove Farm, Llanfoist		Responder:
Summary of Main Issues Raised:	<ol style="list-style-type: none"> 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. 	<ol style="list-style-type: none"> 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

Candidate Site: CS0284 Pen-y-Worlod Stables, Llanfoist		Responder:
Summary of Main Issues Raised:	<ol style="list-style-type: none"> 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. 	<ol style="list-style-type: none"> 1. Glamorgan Gwent Archaeological Trust Ltd 2. Abergavenny & District Civic Society 3. SOUL
Candidate Site: CS0286 Abergavenny Workhouse, Abergavenny		Responder:
Summary of Main Issues Raised:	<ol style="list-style-type: none"> 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. 	<ol style="list-style-type: none"> 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
Stepstow		
Candidate Site: CS0029 Barnetts Farm Chepstow		Representor:
Summary of Main Issues Raised:	<ol style="list-style-type: none"> 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. 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. 	<ol style="list-style-type: none"> 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. 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

	<ol style="list-style-type: none"> 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 Mounon 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 Mounon 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. 	<ol style="list-style-type: none"> 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
Candidate Site: CS0054 West of Racecourse Roundabout, Chepstow		Representor:
<p>Summary of Main Issues Raised:</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 275</p>	<ol style="list-style-type: none"> 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. 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. 	<ol style="list-style-type: none"> 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 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

	<p>16. A responder states that the information presented does not identify the number, type or mix of dwellings/affordable dwellings proposed.</p> <p>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.</p> <p>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.</p> <p>19. Concerns that existing community/public services are already overstretched. Infrastructure and service improvements would be necessary before any development at this site.</p> <p>20. Responders want no more development without affordable housing. No more housing at prices locals cannot afford.</p> <p>21. Concerns that there are no recreation or leisure facilities, nor green infrastructure included in the plans.</p> <p>22. Concerns regarding the proposed lake for surface water drainage and for the adequacy of sewage pumping facilities.</p> <p>23. Concerns regarding water run off and the impact of development on the water table.</p> <p>24. Support for the site having excellent road access, suitable crossings and pedestrian access to the town and local amenities.</p>	
Candidate Site: CS0098 Bayfield, Chepstow		Representor:
<p>Summary of Main Issues Raised: Page 276</p>	<ol style="list-style-type: none"> 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. 3. The site promotor, Vistry, has submitted extensive information in support of the site and makes the following key points: <ul style="list-style-type: none"> • 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. 	<ol style="list-style-type: none"> 1. Glamorgan Gwent Archaeological Trust Ltd 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

Page 277	<ol style="list-style-type: none"> 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 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 maximum of 4275 new houses and exceed this target by 40%. 	<ol style="list-style-type: none"> 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 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
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	<p>32. Concern that the Council's aspirations for job created lack credibility.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>37. Concerns regarding provision of formal and informal open spaces and Green Infrastructure onsite - history of developers not delivering.</p>	
Candidate Site: CS0112 Land at St Lawrence Lane, Chepstow		Representor:
<p>Summary of Main Issues Raised:</p> <p>Page 278</p>	<ol style="list-style-type: none"> 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: <ul style="list-style-type: none"> • 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 facilitate 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. 	<ol style="list-style-type: none"> 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

Page 279	<p>10. Concerns that access onto the A48 here would be dangerous and difficult to use due to queuing traffic.</p> <p>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.</p> <p>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).</p> <p>13. Development in Gloucestershire, and the wider community, impacts traffic levels in Chepstow and demand for services.</p> <p>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.</p> <p>15. Concerns that the plans don't include any additional recreation or leisure facilities. What Green Infrastructure will be included?</p> <p>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.</p> <p>17. Responders state that the plan suggests working from home will continue but evidence suggests people are returning to the workplace.</p> <p>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.</p> <p>19. Responders state that site is far from the town centre, and areas of local employment, and involves steep walks back from the centre.</p> <p>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.</p> <p>21. Concern that there is no provision for safe walking and Active Travel routes.</p> <p>22. Concern that Chepstow is overdeveloped and will become a commuter town with no sense of community.</p> <p>23. Congestion is putting visitors off coming to Chepstow and supporting the shops and food outlets, resulting in a disappointing level of shopping.</p> <p>24. Concerns that the sewage system on Pwllmeyric Hill has significant impact on mountain stream with regular raw sewage outfall in the river.</p> <p>25. Concerns that the land floods frequently.</p> <p>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.</p> <p>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.</p> <p>28. Concern that growth figures conflict with WG advice to limit number to a maximum of 4275 new houses and exceed this target by 40%.</p>	<p>16. 5 Private Individuals</p> <p>17. 2 Private Individuals</p> <p>18. 3 Private Individuals</p> <p>19. 2 Private Individuals</p> <p>20. 3 Private Individuals</p> <p>21. 5 Private Individuals</p> <p>22. 4 Private Individuals</p> <p>23. 1 Private Individual</p> <p>24. 1 Private Individual</p> <p>25. 1 Private Individual</p> <p>26. 1 Private Individual</p> <p>27. 2 Private Individuals</p> <p>28. 2 Private Individuals</p>
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Candidate Site: CS0154 Land to the north of M48, Chepstow		Representor:
Page 280	<p>Summary of Main Issues Raised:</p> <ol style="list-style-type: none"> 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 (WeITAG) study demonstrating that the Highbeech roundabout is already at full capacity. 15. Cllr Louise Brown questions whether there is need for further hotel accommodation. 	<p>Representor:</p> <ol style="list-style-type: none"> 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
Candidate Site: CS0260 South of J2 M48 (Option 1: Hotel & Employment)		Representor:
	<p>Summary of Main Issues Raised:</p> <ol style="list-style-type: none"> 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. 	<p>Representor:</p> <ol style="list-style-type: none"> 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

	7. Support for the site due to it's location close to the motorway and for the additional employment it may bring.	
Candidate Site: CS0261 South of J2 M48 (Option 2: Petrol Station, Drive Thru and Employment)		Representor:
Summary of Main Issues Raised:	<ol style="list-style-type: none"> 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 it's location close to the motorway and for the additional employment it may bring. 	<ol style="list-style-type: none"> 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
Monmouth		
Candidate Site: CS0006 Land at Osbaston Road		Representor:
	No responses received	
Candidate Site: CS0051 Land at Croft y Bwla		Representor:
	No responses received	
Candidate Site: CS0074 Land rear of The Royal Oak		Representor:
	No responses received	
Candidate Site: CS0076 West of Rockfield Road, Monmouth		Representor:
Summary of Main Issues Raised:	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.
Candidate Site: CS0078 Croft y Bwla Farm, Monmouth		Representor:
Summary of Main Issues Raised:	<ol style="list-style-type: none"> 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. 	<ol style="list-style-type: none"> 1. Taylor Wimpey 2. Taylor Wimpey 3. Taylor Wimpey

	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.	
Candidate Site: CS0099 Land at Drybridge Farm		Representor:
	No responses received	
Candidate Site: CS0136 Land at former Poultry Units at Rockfield Road		Representor:
	No responses received	
Candidate Site: CS0151 Former Troy Rail Yard, Monmouth		Representor:
Summary of Main Issues Raised:	<ol style="list-style-type: none"> 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. 	<ol style="list-style-type: none"> 1. 1 Private Individual 2. 1 Private Individual 3. 1 Private Individual 4. 1 Private Individual
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Candidate Site: CS0189 Land at Tudor Road, Monmouth		Representor:
Summary of Main Issues Raised:	<ol style="list-style-type: none"> 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. 	<ol style="list-style-type: none"> 1. Edenstone 2. Edenstone
Candidate Site: CS0216 Land at Hereford Road		Representor:
	No responses received	
Candidate Site: CS0271 Land at Vauxhall Fields		Representor:
	No responses received	
Candidate Site: CS0272 Land at former Poultry Units at Rockfield Road		Representor:
	No responses received	

Candidate Site: CS0274 Land North of Wonastow Road, Monmouth		Representor:
Summary of Main Issues Raised:	<ol style="list-style-type: none"> 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 its 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. 	<ol style="list-style-type: none"> 1. Richborough Estates 2. Richborough Estates 3. Richborough Estates
Candidate Site: CS0275 Land off Wonastow Road Industrial Estate		Representor:
	No responses received	
Candidate Site: CS0277 Land at Drewen Farm, Monmouth		Representor:
Summary of Main Issues Raised:	<ol style="list-style-type: none"> 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. 	<ol style="list-style-type: none"> 1. Vistry Group 2. Vistry Group 3. Vistry Group
Candidate Site: CS0292 Rhossili, Hadnock Road		Representor:
	No responses received	
Caerwent		
Candidate Site: CS0009 Former MoD Training Centre, Caerwent		Representor:
Summary of Main Issues Raised:	<ol style="list-style-type: none"> 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 promoter 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. 	<ol style="list-style-type: none"> 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

Candidate Site: CS0017 Village Farm, Caerwent		Representor:
Summary of Main Issues Raised:	<ol style="list-style-type: none"> 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. 	<ol style="list-style-type: none"> 1. Glamorgan Gwent Archaeological Trust Ltd
Candidate Site: CS0071 Land at Slough Farm, Caerwent		Representor:
Summary of Main Issues Raised:	<ol style="list-style-type: none"> 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. 	<ol style="list-style-type: none"> 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
Caldicot		
Candidate Site: CS0007 Pill Row, Caldicot		Representor:
Summary of Main Issues Raised:	<ol style="list-style-type: none"> 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. 	<ol style="list-style-type: none"> 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

	<p>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.</p> <p>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.</p>	
Candidate Site: CS0067 East & West Church Road, Caldicot		Representor:
Summary of Main Issues Raised:	<p>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.</p>	<p>1. Glamorgan Gwent Archaeological Trust Ltd</p>
Candidate Site: CS0129 Dewstow Village, Former Dewstow Golf Course		Representor:
Summary of Main Issues Raised:	<p>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.</p> <p>2. Site promoter provides support for the Dewstow Village site noting:</p> <ul style="list-style-type: none"> • 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. 	<p>1. Glamorgan Gwent Archaeological Trust Ltd</p> <p>2. Redrow Homes</p>
Crick		
Candidate Site: CS0091 Caerwent Depot, Crick		Representor:
Summary of Main Issues Raised:	<p>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.</p> <p>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</p>	<p>1. Glamorgan Gwent Archaeological Trust Ltd</p> <p>2. 6 Private Individuals</p> <p>3. 6 Private Individuals</p> <p>4. 5 Private Individuals</p> <p>5. 3 Private Individuals</p> <p>6. 3 Private Individuals</p> <p>7. 4 Private Individuals</p>

Page 286	<p>will need to find reliable means to deal with surface water drainage and deal with site constraints. Without 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.</p> <ol style="list-style-type: none"> 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. <ul style="list-style-type: none"> • 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. • 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. 	<ol style="list-style-type: none"> 8. 1 Private Individual 9. 1 Private Individual 10. 1 Private Individual 11. 1 Private Individual 12. Edenstone
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Magor with Undy		
Candidate Site: CS0038 Land to the west of Wales One Business Park, Magor		Representor:
Summary of Main Issues Raised:	<ol style="list-style-type: none"> 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. 	<ol style="list-style-type: none"> Glamorgan Gwent Archaeological Trust Ltd
Candidate Site: CS0206 South of Newport Road, Magor		Representor:
Summary of Main Issues Raised:	<ol style="list-style-type: none"> Glamorgan Gwent Archaeological Trust Ltd assess the site as Red. Geophysical survey in 2008 on part of the site identified potential archaeological features. The site sponsor, Edenstone, have submitted extensive information and state that the development will provide: <ul style="list-style-type: none"> 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. 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. A responder feels that local leisure facilities are already inadequate for the current population. Concerns that health services cannot cope with a further increase in population considering the new developments at Vinegar Hill, Portskewett and Caldicot as well. Concerns that local schools are full/close to capacity. 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. 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. Traffic concerns as any incident on the M4 has a severe impact as any traffic trying to leave the village cannot move. Flooding and excess surface water on the site is also a cause for concern. Improvements have been made but still the field is under water at times. 	<ol style="list-style-type: none"> Glamorgan Gwent Archaeological Trust Ltd Edenstone 1 Private Individual 1 Private Individual 1 Private Individual 1 Private Individual 1 Private Individual 1 Private Individual 1 Private Individual 1 Private Individual
Candidate Site: CS0211 Land at Rockfield Road, Undy		Representor:
Summary of Main Issues Raised:	<ol style="list-style-type: none"> 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. 	<ol style="list-style-type: none"> Glamorgan Gwent Archaeological Trust Ltd

Candidate Site: CS0228 Land off Green Moor Lane, Magor		Representor:
Summary of Main Issues Raised:	<ol style="list-style-type: none"> 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. 	<ol style="list-style-type: none"> 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
Candidate Site: CS0258 Quay Point (Land south of Magor Brewery)		Representor:
Summary of Main Issues Raised:	<ol style="list-style-type: none"> 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. 	<ol style="list-style-type: none"> 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
Rogiet		
Candidate Site: CS0168 Adjacent to Merlin Close, Rogiet		Representor:
Summary of Main Issues Raised:	<ol style="list-style-type: none"> 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: <ul style="list-style-type: none"> • 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. 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. 	<ol style="list-style-type: none"> 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 9. 2 Private Individual 10. 5 Private Individual 11. 2 Private Individuals 12. 1 Private Individual

	<ol style="list-style-type: none"> 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. 	
Candidate Site: CS0253 Ifton Manor (Site A), Rogiet		Representor:
<p>Summary of Main Issues Raised:</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 289</p>	<ol style="list-style-type: none"> 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: <ul style="list-style-type: none"> • 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. 	<ol style="list-style-type: none"> 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

	<p>9. A responder states that this additional strategic delivery will offset the scaling back of CS0251 to deliver overall housing need.</p> <p>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.</p> <p>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.</p>	
Candidate Site: CS0254 Ifton Manor (Site B), Rogiet		Representor:
<p>Summary of Main Issues Raised:</p> <p>Page 290</p>	<ol style="list-style-type: none"> 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: <ul style="list-style-type: none"> • 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. 	<ol style="list-style-type: none"> 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)
Candidate Site: CS0255 Land adj Ifton Industrial Estate, Rogiet		Representor:
<p>Summary of Main Issues Raised:</p>	<ol style="list-style-type: none"> 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. 	<ol style="list-style-type: none"> 1. Glamorgan Gwent Archaeological Trust Ltd

Candidate Site: CS0256 The Paddocks, Adj Rogiet Pool		Representor:
Summary of Main Issues Raised:	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

Secondary Settlements

Penperlleni

Candidate Site: CS0037 South Usk Rd, Penperlleni		Representor:
Summary of Main Issues Raised:	<ol style="list-style-type: none"> 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. 	<ol style="list-style-type: none"> 1. Glamorgan Gwent Archaeological Trust Ltd 2. Edenstone
Candidate Site: CS0138 Land at Goytre Farm, Penperlleni		Representor:
Summary of Main Issues Raised:	<ol style="list-style-type: none"> 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. 	<ol style="list-style-type: none"> 1. Glamorgan Gwent Archaeological Trust Ltd 2. Persimmon Homes East Wales
Candidate Site: CS0217 Land at Fairfield, Penperlleni		Representor:
Summary of Main Issues Raised:	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

Candidate Site: CS0279 Land West of Usk Road, Penperlleni		Representor:
Summary of Main Issues Raised:	<ol style="list-style-type: none"> 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 pointse: <ul style="list-style-type: none"> • 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. 	<ol style="list-style-type: none"> 1. Glamorgan Gwent Archaeological Trust Ltd 2. Barratt and David Wilson Homes South Wales
Candidate Site: CS0280 Land at Walnut Tree Farm, Penperlleni		Representor:
Summary of Main Issues Raised:	<ol style="list-style-type: none"> 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. 2. The site promotor, Edenstone, has submitted extensive information in support of the site. Key points include: <ul style="list-style-type: none"> • 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. 	<ol style="list-style-type: none"> 1. Glamorgan Gwent Archaeological Trust Ltd 2. Edenstone

Raglan

Candidate Site: CS0069 Raglan Enterprise Park		Representor:
Summary of Main Issues Raised:	<ol style="list-style-type: none"> 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. 	<ol style="list-style-type: none"> 1. Glamorgan Gwent Archaeological Trist Ltd 2. Raglan Community Council 3. 1 Private Individual 4. 1 Private Individual

	<p>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.</p> <p>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.</p>	
Candidate Site: CS0183 South of Monmouth Road, Raglan		Representor:
<p>Summary of Main Issues Raised:</p> <p>Page 293</p>	<ol style="list-style-type: none"> 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. 	<ol style="list-style-type: none"> 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
Candidate Site: CS0205 Land at Usk Road, Raglan		Representor:
<p>Summary of Main Issues Raised:</p>	<ol style="list-style-type: none"> 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. 	<ol style="list-style-type: none"> 1. Glamorgan Gwent Archaeological Trust Ltd 2. Raglan Community Council 3. 1 Private Individual 4. 1 Private Individual

	<ol style="list-style-type: none"> 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. 	5. Edenstone
Candidate Site: CS0278 Land West of Raglan		Representor:
<p>Summary of Main Issues Raised:</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 294</p>	<ol style="list-style-type: none"> 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. 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. 	<ol style="list-style-type: none"> 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 9. 1 Private Individual 10. 1 Private Individual 11. 1 Private Individual
Candidate Site: CS0281 Raglan Country Estate		Representor:
<p>Summary of Main Issues Raised:</p>	<ol style="list-style-type: none"> 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. 	<ol style="list-style-type: none"> 1. Glamorgan Gwent Archaeological Trust Ltd 2. Raglan Community Council

	<ol style="list-style-type: none"> 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. 	<ol style="list-style-type: none"> 3. Raglan Community Council plus 1 Private Individual 4. Raglan Community Council 5. 1 Private Individual
Usk		
Candidate Site: CS0039 Little Castle Farm, Monmouth Road, Usk		Representor:
<p>Summary of Main Issues Raised:</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 295</p>	<ol style="list-style-type: none"> 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. 	<ol style="list-style-type: none"> 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

	<p>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.</p> <p>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.</p> <p>15. Responders state that the land proposed is greenfield, grade 3 agricultural land currently used for crops and grazing.</p> <p>16. Concerns re the loss of open green space, within walking distance, for health and wellbeing.</p> <p>17. Concerns that development would affect the privacy of existing homes.</p> <p>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.</p> <p>19. Notices at the candidate sites would have ensured a more representative consultation.</p>	
Candidate Site: CS0105 Land at Former Goods Yard, Usk		Representor:
<p>Summary of Main Issues Raised:</p> <p>Page 296</p>	<ol style="list-style-type: none"> 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 it's 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. 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. 	<ol style="list-style-type: none"> 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

Candidate Site: CS0113 Burrium Gate (Phase II), Usk	Representor:
<p>Summary of Main Issues Raised:</p> <ol style="list-style-type: none"> 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 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. 	<ol style="list-style-type: none"> 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 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

	<p>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.</p> <p>19. Notices at the candidate sites would have ensured a more representative consultation.</p>	
Candidate Site: CS0282 North Burrium Gate, Usk		Repsentor:
<p>Summary of Main Issues Raised:</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 298</p>	<ol style="list-style-type: none"> 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: <ul style="list-style-type: none"> • 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. 	<ol style="list-style-type: none"> 1. Glamorgan Gwent Archaeological Trust Ltd 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

	<p>12. Responders state that the site falls outside the desirable 20 minute walk from the centre of Usk town and, with its significant gradient, would not be a sustainable site nor promote active travel.</p> <p>13. Concerns re the limited amount of employment within Usk with no realistic expectation developing sufficient jobs to employ new residents.</p> <p>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.</p> <p>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.</p> <p>16. Responders state that the land proposed is greenfield, grade 3 agricultural land currently used for crops and grazing.</p> <p>17. Concerns re the loss of open green space, within walking distance, for health and wellbeing.</p> <p>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.</p> <p>19. Notices at the candidate sites would have ensured a more representative consultation.</p>	
Candidate Site: CS0285 Glen Yr Afon, Usk		Representor:
Summary of Main Issues Raised:	<p>1. A responder raises the following concerns:</p> <ul style="list-style-type: none"> • 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

Main Rural Settlements

Devauden		
Candidate Site: CS0036 North Devauden		Representor:
Summary of Main Issues Raised:	<p>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Green. No recorded or known archaeological or historic environment issues.</p> <p>2. The site promotor, Leathdunn Ltd, has submitted supporting information for the site and makes the following points:</p> <ul style="list-style-type: none"> • 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. 	<p>1. Glamorgan Gwent Archaeological Trust Ltd</p> <p>2. Leathdunn Ltd</p> <p>3. 3 Private Individuals</p> <p>4. 2 Private Individual</p> <p>5. 3 Private Individuals</p> <p>6. 2 Private Individual</p>

	<ul style="list-style-type: none"> • 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. <ol style="list-style-type: none"> 3. Responders state that the site was previously rejected as a candidate site due to it's 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. 	7. 1 Private Individual
Candidate Site: CS0214 Land at Churchfields, Devauden		Representor:
Summary of Main Issues Raised: Page 300	<ol style="list-style-type: none"> 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: <ul style="list-style-type: none"> • 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. 	<ol style="list-style-type: none"> 1. Glamorgan Gwent Archaeological Trust Ltd 2. Monmouthshire Housing Association
Little Mill		
Candidate Site: CS0016 Land to the east of Little Mill		Representor:
Summary of Main Issues Raised:	<ol style="list-style-type: none"> 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. 	<ol style="list-style-type: none"> 1. Glamorgan Gwent Archaeological Trust Ltd 2. BB3 Limited 3. 1 Private Individual 4. SEWRIGS group

	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.	
Candidate Site: CS0075 Little Mill (Site B)		Representor:
Summary of Main Issues Raised:	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
Candidate Site: CS0103 Adj Berthon Road, Little Mill		Representor:
Summary of Main Issues Raised:	<ol style="list-style-type: none"> 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. 	<ol style="list-style-type: none"> 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
Candidate Site: CS0104 Cae Melin, Little Mill		Representor:
Summary of Main Issues Raised:	<ol style="list-style-type: none"> 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: <ul style="list-style-type: none"> • The site is within a short walk of local amenities and services including a bus 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. 	<ol style="list-style-type: none"> 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

	<ol style="list-style-type: none"> 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. 	
Candidate Site: CS0233 Mulberry House, Berthon Road, Little Mill		Representor:
Summary of Main Issues Raised:	<ol style="list-style-type: none"> 1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Green - No recorded or known archaeological or historic environment issues. 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. 	<ol style="list-style-type: none"> 1. Glamorgan Gwent Archaeological Trust Ltd 2. SEWRIGS group
Candidate Site: CS0241 Land to North of Little Mill (Site A)		Representor:
Summary of Main Issues Raised:	<ol style="list-style-type: none"> 1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Green - No recorded or known archaeological or historic environment issues. 	<ol style="list-style-type: none"> 1. Glamorgan Gwent Archaeological Trust Ltd
Llanbadoc		
SITE FILTERED OUT - Candidate Site: CS0238 Land at Prioress Mill Lane, Llanbadoc		Representor:
Summary of Main Issues Raised:	<ol style="list-style-type: none"> 1. A responder makes the following points in support of the site: <ul style="list-style-type: none"> • 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. 	<ol style="list-style-type: none"> 1. 1 Private Individual

Llandogo

Candidate Site: CS0101 Land adjacent to Parklands, Llandogo		Representor:
<p>Page 03</p> <p>Summary of Main Issues Raised:</p>	<ol style="list-style-type: none"> 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. 	<ol style="list-style-type: none"> 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
Candidate Site: CS0124 The Reckless, Llandogo		Representor:
<p>Summary of Main Issues Raised:</p>	<ol style="list-style-type: none"> 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. 	<ol style="list-style-type: none"> 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

Candidate Site: CS0230 Land South of A466, Llandogo		Representor:
<p>Summary of Main Issues Raised:</p>	<ol style="list-style-type: none"> 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. 	<ol style="list-style-type: none"> 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
Candidate Site: CS0245 Land at Parklands, Llandogo		Representor:
<p>Summary of Main Issues Raised:</p>	<ol style="list-style-type: none"> 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. 	<ol style="list-style-type: none"> 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

Llanellen		
Candidate Site: CS0027 Adj Llanellen Court (North)		Representor:
Summary of Main Issues Raised:	<ol style="list-style-type: none"> 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. 	<ol style="list-style-type: none"> 1. Glamorgan Gwent Archaeological Trust Ltd
Candidate Site: CS0215 Land at Llanellen		Representor:
Summary of Main Issues Raised:	<ol style="list-style-type: none"> 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: <ul style="list-style-type: none"> • 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. 	<ol style="list-style-type: none"> 1. Glamorgan Gwent Archaeological Trust Ltd 2. Monmouthshire Housing Association
Candidate Site: CS0243 North of Village Hall, Llangybi		Representor:
Summary of Main Issues Raised:	<ol style="list-style-type: none"> 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: <ul style="list-style-type: none"> • 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. 	<ol style="list-style-type: none"> 1. Glamorgan Gwent Archaeological Trust Ltd 2. Llanover Estates 3. 1 Private Individual 4. 1 Private Individual 5. 1 Private Individual 6. 1 Private Individual

Llangwm		
Candidate Site: CS0283 Rockfield Farm, Llangwm		Representor:
Summary of Main Issues Raised:	<ol style="list-style-type: none"> 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. 	<ol style="list-style-type: none"> 1. Glamorgan Gwent Archaeological Trust Ltd
Llangybi		
Candidate Site: CS0019 St Cybi Drive, Llangybi		Representor:
Summary of Main Issues Raised:	<ol style="list-style-type: none"> 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. 	<ol style="list-style-type: none"> 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
Candidate Site: CS0020 West The Chase, Llangybi		Representor:
Summary of Main Issues Raised:	<ol style="list-style-type: none"> 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. 	<ol style="list-style-type: none"> 1. Glamorgan Gwent Archaeological Trust 2. Llangybi Fawr Community Council plus 4 Private Individuals 3. Llangybi Fawr Community Council plus 2 Private Individuals

	<ol style="list-style-type: none"> 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. 	<ol style="list-style-type: none"> 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
Candidate Site: CS0242 Land North of New House, Llangybi		Representor:
<p>Summary of Main Issues Raised:</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 307</p>	<ol style="list-style-type: none"> 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. 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. 	<ol style="list-style-type: none"> 1. Glamorgan Gwent Archaeological Trust 2. Llangybi Fawr Community Council plus 1 Private Individual 3. Llangybi Fawr Community Council 4. Llangybi Fawr Community Council plus 1 Private Individual 5. Llangybi Fawr Community Council 6. Llangybi Fawr Community Council 7. Llangybi Fawr Community Council
Llanishen		
Candidate Site: CS0221 Land at Penarth Farm, Llanishen		Representor:
Summary of Main	<ol style="list-style-type: none"> 1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Green – No recorded or known archaeological or historic environment issues. 	<ol style="list-style-type: none"> 1. Glamorgan Gwent Archaeological Trust Ltd

Issues Raised:		
Candidate Site: CS0222 Land at Penarth Farm, Llanishen		Representor:
Summary of Main Issues Raised:	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
Llanover		
Candidate Site: CS0139 Land at Former Petrol Station, Llanover		Representor:
Summary of Main Issues Raised:	<p>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.</p> <p>2. The site promotor, Llanover Estates, has submitted extensive information in support of the site and makes the following points:</p> <ul style="list-style-type: none"> 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. <p>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.</p>	<p>1. Glamorgan Gwent Archaeological Trust Ltd</p> <p>2. Llanover Estates</p> <p>3. 1 Private Individual</p>
Page 308		
Candidate Site: CS0140 South of Rhyd-y-Meirch, Llanover		Representor:
Summary of Main Issues Raised:	<p>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Green. No recorded or known archaeological or historic environment issues.</p> <p>2. The site promotor, Llanover Estates, has submitted extensive information in support of the site and makes the following points:</p> <ul style="list-style-type: none"> 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. 	<p>1. Glamorgan Gwent Archaeological Trust Ltd</p> <p>2. Llanover Estates</p>

Mathern

Candidate Site: CS0026 West Baileys Hay, Mathern		Representor:
Page 309	<p>Summary of Main Issues Raised:</p> <ol style="list-style-type: none"> 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. 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 	<p>Representor:</p> <ol style="list-style-type: none"> 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 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
Candidate Site: CS0053 East of Cherry Trees, Mathern		Representor:
	<p>Summary of Main Issues Raised:</p> <ol style="list-style-type: none"> 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. 	<p>Representor:</p> <ol style="list-style-type: none"> 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

	<ol style="list-style-type: none"> 6. Concerns re unmanaged conservation area. 7. Responder expresses overall support. 	<ol style="list-style-type: none"> 5. 1 Private Individual 6. 1 Private Individual 7. Mathern Community Council
Portskewett		
Candidate Site: CS0066 Bridge View Farm, Portskewett		Representor:
Summary of Main Issues Raised:	<ol style="list-style-type: none"> 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 cope 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 affect on nature, flooding and the general health of those who live here. 	<ol style="list-style-type: none"> 1. Glamorgan Gwent Archaeological Trust Ltd 2. 1 Private Individual 3. 1 Private Individual 4. 1 Private Individual 5. 1 Private Individual
Candidate Site: CS0259 Bridge View Farm, Portskewett		Representor:
Summary of Main Issues Raised:	<ol style="list-style-type: none"> 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 cope 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 affect on nature, flooding and the general health of those who live here. 	<ol style="list-style-type: none"> 1. Glamorgan Gwent Archaeological Trust Ltd 2. 1 Private Individual 3. 1 Private Individual 4. 1 Private Individual 5. 1 Private Individual
Pwllmeryic		
Candidate Site: CS0030 Land Off Chapel Lane, Pwllmeryic		Representor:
Summary of Main Issues Raised:	<ol style="list-style-type: none"> 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 Pwllmeryic 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. 	<ol style="list-style-type: none"> 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

	<ol style="list-style-type: none"> 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. 	<ol style="list-style-type: none"> 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
Shirenewton		
Summary of Main Issues Raised:	Candidate Site: CS0111 Adjacent to Thistledown Barn, Shirenewton	Representor:
	<ol style="list-style-type: none"> 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 	<ol style="list-style-type: none"> 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. Shirenewton Community Council plus 7 Private Individuals

Page 312	<p>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.</p> <ol style="list-style-type: none"> 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. 	<ol style="list-style-type: none"> 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
Candidate Site: CS0208 West Shirenewton Recreation Hall, Shirenewton		Representor:
Summary of Main Issues Raised:	<ol style="list-style-type: none"> 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. 	<ol style="list-style-type: none"> 1. Glamorgan Gwent Archaeological Trust Ltd 2. Shirenewton Community Council plus 4 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

Page 313	<ol style="list-style-type: none"> 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. 	<ol style="list-style-type: none"> 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
Candidate Site: CS0218 Land at Ditch Hill Lane, Shirenewton (Option A)		Representor:
Summary of Main Issues Raised:	<ol style="list-style-type: none"> 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. 	<ol style="list-style-type: none"> 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

Page 314	<ol style="list-style-type: none"> 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. 	<ol style="list-style-type: none"> 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. Shirenewton Community Council 14. 1 Private Individual 15. 1 Private Individual
Candidate Site: CS0225 Land at Ditch Hill Lane, Shirenewton (Option B)		Representor:
Summary of Main Issues Raised:	<ol style="list-style-type: none"> 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. 	<ol style="list-style-type: none"> 1. Glamorgan Gwent Archaeological Trust Ltd 2. Shirenewton Community Council plus 6 Private Individuals 3. Shirenewton Community Council plus 7 Private Individuals

Page 315	<ol style="list-style-type: none"> 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. 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. 	<ol style="list-style-type: none"> 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. Shirenewton Community Council 14. 1 Private Individual 15. 1 Private Individual
Candidate Site: CS0226 Land at Ditch Hill Lane, Shirenewton (Option C)	Representor:	
Summary of Main	<ol style="list-style-type: none"> 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 	<ol style="list-style-type: none"> 1. Glamorgan Gwent Archaeological Trust Ltd

Page 316	<p>geophysical survey prior to any determination of an application would inform mitigation, which may include further pre-determination work.</p> <ol style="list-style-type: none"> 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. 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. 	<ol style="list-style-type: none"> 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 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
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Candidate Site: CS0229 Land Opposite Chepstow Garden Centre, Shirenewton	Representor:
<p>Summary of Main Issues Raised:</p> <ol style="list-style-type: none"> 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 motorists 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 accident. The site is also looked down upon from the garden centre also causing glare issues. Responders believe solar panel sites should be 	<ol style="list-style-type: none"> 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

<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 318</p>	<p>in more isolated locations. Screening of the site will not be effective due to its lower position compared to the surrounding landscape.</p> <ol style="list-style-type: none"> 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 there 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. 	
<p>Candidate Site: CS0231 West of Shirenewton Recreation Hall (Smaller Site), Shirenewton</p>		<p>Representor:</p>
<p>Summary of Main Issues Raised:</p>	<ol style="list-style-type: none"> 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 	<ol style="list-style-type: none"> 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

Page 319	<p>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.</p> <ol style="list-style-type: none"> 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. 	<ol style="list-style-type: none"> 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. 1 Private Individual
Candidate Site: CS0232 Land West of Redd Landes, Shirenewton		Representor:
Summary of Main Issues Raised:	<ol style="list-style-type: none"> 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 	<ol style="list-style-type: none"> 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

Page 320	<p>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.</p> <ol style="list-style-type: none"> 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. 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. 	<ol style="list-style-type: none"> 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
Candidate Site: CS0240 Land to the East of Mounton Court, Shirenewton		Representor:
Summary of Main Issues Raised:	<ol style="list-style-type: none"> 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. 	<ol style="list-style-type: none"> 1. Glamorgan Gwent Archaeological Trust Ltd 2. Shirenewton Community Council plus 5 Private Individuals 3. Shirenewton Community Council plus 6 Private Individuals

Page 321	<ol style="list-style-type: none"> 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. 	<ol style="list-style-type: none"> 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
Candidate Site: CS0240 Land to the East of Mounton Court, Shirenewton		Representor:
Summary of Main	<ol style="list-style-type: none"> 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. 	<ol style="list-style-type: none"> 1. Glamorgan Gwent Archaeological Trust Ltd

Page 322	<p>Issues Raised:</p> <ol style="list-style-type: none"> 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. 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. 	<ol style="list-style-type: none"> 2. Shirenewton Community Council plus 5 Private Individuals 3. Shirenewton Community Council plus 7 Private Individuals 4. Shirenewton Community Council plus 4 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 4 Private Individuals 9. Shirenewton Community Council plus 2 Private Individuals 10. 1 Private Individual 11. 2 Private Individuals 12. 1 Private Individual 13. Shirenewton Community Council 14. 1 Private Individual 15. 1 Private Individual 16. 1 Private Individual
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Candidate Site: CS0244 Land West of Ditch Hill Lane, Shirenewton	Representor:
<p>Summary of Main Issues Raised:</p> <ol style="list-style-type: none"> 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. 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. 	<ol style="list-style-type: none"> 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. Shirenewton Community Council 14. 1 Private Individual 15. Cllr Louise Brown

	<p>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.</p> <p>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.</p>	
St Arvans		
Candidate Site: CS0003 Livox Quarry		Representor:
Summary of Main Issues Raised:	<ol style="list-style-type: none"> 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. 	<ol style="list-style-type: none"> Glamorgan Gwent Archaeologic Trust Ltd
Candidate Site: CS0077 Adj Piercefield Public House, St Arvans		Representor:
Summary of Main Issues Raised:	<ol style="list-style-type: none"> 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. 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. Concerns regarding capacity of the water treatment plant. 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. 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. 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. Concerns regarding a loss of privacy to properties and gardens. The site sponsor, Marston's PLC, has submitted supporting information and makes the following points: <ul style="list-style-type: none"> 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. 	<ol style="list-style-type: none"> Glamorgan Gwent Archaeological Trust Ltd 1 Private Individual 1 Private Individual 1 Private Individual SEWRIGS group plus 2 Private Individuals 1 Private Individual 1 Private Individual Marston's PLC

	<ul style="list-style-type: none"> • 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. 	
Candidate Site: CS00223 Land at New Barn Workshop, St Arvans		Representor:
Summary of Main Issues Raised:	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 8 th 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
Trellech		
Candidate Site: CS0092 Monmouth Road, Trellech		
Summary of Main Issues Raised:	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
Candidate Site: CS0234 East of De Clere Way, Trellech		Representor:
Summary of Main Issues Raised:	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
Werngifford Pandy		
Candidate Site: CS0219 Land at Sun Meadow		Representor:
	No responses received.	

Candidate Sites for Protection

Abergavenny & Llanfoist		
Candidate Site: CSP001 Gavenny Valley, Abergavenny		Representor:
Page 326	<p>Summary of Main Issues Raised:</p> <ol style="list-style-type: none"> 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 SINCE 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 breach 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. 	<ol style="list-style-type: none"> 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
Candidate Site: CSP002 Western Abergavenny		Responder:
Summary of Main	<ol style="list-style-type: none"> 1. General support for protection as a buffer to the National Park; to be retained as a Green Wedge. 	<ol style="list-style-type: none"> 1. 2 Private Individuals

Issues Raised:	<ol style="list-style-type: none"> 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. 	<ol style="list-style-type: none"> 2. Abergavenny Town Council, Abergavenny & District Civic Society 3. Abergavenny Town Council, Abergavenny & District Civic Society 4. Abergavenny & District Civic Society
Candidate Site: CSP003 Land at Pentre Road, Abergavenny		Responder:
<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 327</p> Summary of Main Issues Raised:	<ol style="list-style-type: none"> 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. 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. 	<ol style="list-style-type: none"> 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 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

Candidate Site: CSP004 Land north of Abergavenny		Responder:
Page 328	<p>Summary of Main Issues Raised:</p> <ol style="list-style-type: none"> 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. 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. 	<ol style="list-style-type: none"> 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
Chepstow		
Candidate Site: CSP017 Land at Bayfield, Chepstow		Representor:
Page 328	<p>Summary of Main Issues Raised:</p> <ol style="list-style-type: none"> 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. 	<ol style="list-style-type: none"> 1. 1 Private Individual 2. 1 Private Individual



monmouthshire
sir fynwy

Equality and Future Generations Evaluation

<p>Name of the Officer completing the evaluation Mark Hand</p> <p>Phone no: 07773478579 E-mail: markhand@monmouthshire.gov.uk</p>	<p>Please give a brief description of the aims of the proposal</p> <p>To seek Place Scrutiny Committee’s pre-decision scrutiny on post-consultation amendments 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.</p>
<p>Name of Service area</p> <p>Planning (Planning Policy)</p>	<p>Date 28/09/2023</p>

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.

[Type here]

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 Preferred Strategy 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	<p>The Preferred Strategy seeks to provide a more balanced demographic profile for Monmouthshire. It provides the strategic direction for development and use of land in Monmouthshire (excluding the area within the Brecon Beacons National Park) and identifies how much sustainable growth is needed and where this growth will broadly located for Monmouthshire up to 2033. The recent Covid-19 pandemic has demonstrated the importance of sustainable communities and a balanced demography to support the older age groups.</p> <p>Placemaking is embedded throughout the Plan, with detailed masterplanning and design policies to be set out in the Deposit Plan ensuring that exemplar places are created that are safe, accessible and pleasant for all.</p>

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	<p>The Preferred Strategy 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. The recent Covid-19 pandemic has emphasised the importance of place-making and Green Infrastructure for the provision of open spaces in close proximity to homes for physical and mental wellbeing.</p>	None	<p>The Preferred Strategy aims to support the well-being of current and future generations that are more inclusive, cohesive, prosperous and vibrant. It provides the strategic direction for development and use of land in Monmouthshire (excluding the area within the Brecon Beacons National Park) and identifies how much sustainable growth is needed and where this growth will broadly be located for Monmouthshire up to 2033.</p> <p>Placemaking is embedded throughout the Plan, with detailed masterplanning and design policies to be set out in the Deposit Plan ensuring that exemplar places are created that are safe, accessible and pleasant for all.</p>
Gender reassignment	None.	None.	<p>Placemaking is embedded throughout the Plan, with detailed masterplanning and design policies to be set out in the Deposit Plan ensuring that exemplar places are created that are safe, accessible and pleasant for all.</p>

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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, with detailed masterplanning and design policies to be set out in the Deposit Plan ensuring that exemplar places are created that are safe, accessible and pleasant for all.
Race	.None.	None.	Placemaking is embedded throughout the Plan, with detailed masterplanning and design policies to be set out in the Deposit Plan 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, with detailed masterplanning and design policies to be set out in the Deposit Plan 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	<p>One of the challenges facing the County is the imbalance between male and female earnings, although this situation is improving. The Preferred Strategy aims to provide economic growth and employment provision, which could indirectly impact on wage equality and therefore access to housing and quality of life.</p>	<p>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.</p>	<p>The Preferred Strategy aims to support economic growth and prosperity. It provides the strategic direction for development and use of land in Monmouthshire (excluding the area within the Brecon Beacons National Park) and identifies how much sustainable growth is needed and where this growth will broadly be located for Monmouthshire up to 2033. Other policy tools beyond the RLDP are available to the Council could assist with securing well-paid employment opportunities within the County.</p> <p>Placemaking is embedded throughout the Plan, with detailed masterplanning and design policies to be set out in the Deposit Plan ensuring that exemplar places are created that are safe, accessible and pleasant for all.</p>
Sexual Orientation	None.	None.	<p>Placemaking is embedded throughout the Plan, with detailed masterplanning and design policies to be set out in the Deposit Plan ensuring that exemplar places are created that are safe, accessible and pleasant for all.</p>

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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?
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Socio-economic Duty and Social Justice	<p>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 Preferred Strategy 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</p>	<p>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.</p>	<p>The Preferred Strategy sets out the strategic planning policy framework to assist in addressing these key issues. The Preferred Strategy sets out our commitment to maximising the provision of affordable homes on new housing allocations and to deliver net zero carbon new homes.</p> <p>We will consider the need for planning policies in the Deposit Plan to control the housing mix of the market housing on development sites, to ensure it helps create mixed communities and supports the retention of younger people who can afford an open market home were there sufficient supply of 2 and 3 bedroom homes.</p> <p>We will consider the need for small affordable housing schemes in rural settlements similar to the current LDP's 60/40 sites in the Deposit RLDP.</p> <p>We will consider a range of policies in the</p>
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	<p>safe, secure and suitable housing. Requiring new homes to be net zero carbon will improve energy efficiency for new build properties which will reduce the cost of living. The provision of suitable employment land, planning policy tools to support business and the use of other (non-planning) tools to stimulate economic activity will increase employment opportunities within the County. In accordance with the WFGA, the RLDP also seeks to prevent future problems and will therefore continue to avoid new development in flood risk areas and will seek net zero carbon development to help address the climate emergency and also tackle issues such as fuel poverty.</p>		<p>Deposit RLDP around the climate change theme to minimise the carbon footprint of new development, and therefore mitigate negative impacts associated with the proposed growth.</p> <p>A policy requirement for broadband infrastructure provision will maximise opportunities for all to access the technology to work from home where possible, reducing commuting and associated costs.</p>
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3. Policy making and the Welsh language.

<p>How does your proposal impact on the following aspects of the Council's Welsh Language Standards:</p>	<p>Describe the positive impacts of this proposal</p>	<p>Describe the negative impacts of this proposal</p>	<p>What has been/will be done to mitigate any negative impacts or better contribute to positive impacts</p>
<p>Policy Making</p> <p>Effects on the use of the Welsh language,</p> <p>Promoting Welsh language</p> <p>Treating the Welsh language no less favourably</p>	<p>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 Preferred Strategy is subject to a Welsh Language Impact Assessment</p>	<p>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.</p>	<p>The Preferred Strategy aims to support culture and the Welsh language.</p> <p>We will liaise with the Local Education Authority to understand if the proposed growth and spatial strategy necessitates additional Welsh medium school provision.</p> <p>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:</p> <ul style="list-style-type: none"> - 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.

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	(WLIA) as part of the 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 Preferred Strategy 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.

[Type here]

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?
<p>A prosperous Wales Efficient use of resources, skilled, educated people, generates wealth, provides jobs</p>	<p>Positive: The Preferred Strategy identifies the level of growth over the RLDP period and spatial distribution of this growth, including identification of the Preferred Strategic Site Allocations. As well as housing growth, the Preferred Strategy aims to provide economic growth and employment provision in both urban and rural areas.</p> <p>Negative: Careful site selection is required to minimise loss of best and most versatile agricultural land and mineral resource.</p>	<p>The Preferred Strategy 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.</p>
<p>A resilient Wales Maintain and enhance biodiversity and ecosystems that support resilience and can adapt to change (e.g. climate change)</p>	<p>Positive: The Preferred Strategy 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 Preferred Strategy recognises that we are in a climate and nature emergency by including a specific climate and nature emergency objective. The Preferred Strategy 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</p>	<p>The Preferred Strategy 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.</p> <p>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.</p>

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?
	<p>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.</p> <p>The recent pandemic has emphasised the need to enable such responses in delivering sustainable and resilient communities for all. It has also emphasised the importance of placemaking and Green Infrastructure for the provision of open spaces in close proximity to homes for physical and mental wellbeing.</p> <p>Negative: Additional growth would likely result in further pressure on the natural environment. New developments could nevertheless improve Green Infrastructure and ecological connectivity through opportunities to create new linkages. The value and importance of having access to locally accessible open/green spaces to assist in recreation and health and well-being has been heightened during the recent pandemic.</p>	
<p>A healthier Wales People’s physical and mental wellbeing is maximized and health impacts are understood</p>	<p>Positive: The Preferred Strategy identifies the level of growth over the RLDP period and spatial distribution of this growth, including identification of the Preferred Strategic Site Allocations. It is recognised that any developments will be encouraged to support healthier lifestyles and</p>	<p>The Preferred Strategy includes RLDP Objectives relating to Health and Well-being in order to address the identified issues relating to creating a healthier Wales. The recent Covid-19 pandemic has emphasised the vulnerability of those in our communities with underlying health conditions, as</p>


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?
	<p>provide sufficient open space. The RLDP will encourage Active Travel and will reflect the Integrated Network Maps. The recent Covid-19 pandemic has emphasised the vulnerability of those in our communities with underlying health conditions, as well as the importance of placemaking and Green Infrastructure for the provision of open spaces in close proximity to homes for physical and mental wellbeing.</p> <p>The need for affordable housing, both in terms of purchase/rent and living costs, is being exacerbated by the current cost of living crisis. The Preferred Strategy seeks to maximise affordable housing through delivery of 50% affordable homes on all new site allocations and provision of net zero carbon homes.</p> <p>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. Moreover, 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.</p>	<p>well as the importance of place-making and green infrastructure for the provision of open spaces in close proximity to homes for physical and mental wellbeing.</p>
<p>A Wales of cohesive communities Communities are attractive, viable, safe and well connected</p>	<p>Positive: The Preferred Strategy identifies the level of growth over the RLDP period and spatial distribution of this growth, including identification of the Preferred Strategic Site Allocations. The</p>	<p>The Preferred Strategy has been assessed against the RLDP Objectives including housing, place-making, communities, rural communities, infrastructure and accessibility in order to address</p>

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?
	<p>Preferred Strategy also considers the balance of housing, employment and infrastructure in both urban and rural areas. The recent pandemic has emphasised the importance of socially sustainable communities and ensuring a balanced demography.</p> <p>Negative: None</p>	<p>the identified issues relating to creating a Wales of cohesive communities.</p> <p>Placemaking is embedded throughout the Plan, with detailed masterplanning and design policies to be set out in the Deposit Plan ensuring that exemplar places are created that are safe, accessible and pleasant for all.</p>
<p>A globally responsible Wales Taking account of impact on global well-being when considering local social, economic and environmental wellbeing</p>	<p>Positive: The Preferred Strategy identifies the level of growth over the RLDP period and spatial distribution of this growth, including identification of the Preferred Strategic Site Allocations. 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 global temperatures to 1.5°C. The Preferred Strategy 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 Preferred Strategy also includes a specific strategic policy relating to climate change.</p> <p>Negative: None.</p>	<p>The Preferred Strategy 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.</p> <p>Section 6 of the Environment Act already requires biodiversity enhancement, which will help address the emergency.</p>


<p>Well Being Goal</p>	<p>Does the proposal contribute to this goal? Describe the positive and negative impacts.</p>	<p>What actions have been/will be taken to mitigate any negative impacts or better contribute to positive impacts?</p>
<p>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</p>	<p>Positive: The Preferred Strategy identifies the level of growth over the RLDP period and spatial distribution of this growth, including identification of the Preferred Strategic Site Allocations. The Preferred Strategy includes an objective relating to Culture, Heritage and the Welsh language.</p> <p>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.</p>	<p>The Preferred Strategy 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 liaise with the Local Education Authority to understand if the proposed growth necessitates additional Welsh medium school provision.</p>
<p>A more equal Wales People can fulfil their potential no matter what their background or circumstances</p>	<p>Positive: The Preferred Strategy identifies the level of growth over the RLDP period and spatial distribution of this growth, including identification of the Preferred Strategic Site Allocations. 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 Preferred Strategy 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.</p> <p>Negative: None.</p>	<p>The Preferred Strategy includes an objective relating to demography which has been set in order to address the identified issues relating to creating a more equal Wales. The recent pandemic has highlighted the links between poverty and resilience, as well as the higher level of homelessness. The Preferred Strategy seeks to take action to enable younger people who are currently priced-out of the 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.</p>

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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?
 <p>Balancing short term need with long term and planning for the future</p>	<p>The Preferred Strategy sets out the level of growth for housing/employment and the spatial distribution of this growth across the County. The Preferred Strategy also sets out the RLDP vision, the role of which is to clarify the core purpose of the RLDP and provide a framework for developing the Plan and future detailed policies. The Vision sets the overarching context for Monmouthshire for the period up to 2033.</p>	<p>A total of 17 RLDP Objectives are included in the Preferred Strategy in order to address the issues, challenges, opportunities and drivers facing the County.</p>

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?
<div data-bbox="103 671 138 858" data-label="Page-Header" style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 346</div> <div data-bbox="114 743 309 983" data-label="Image"> </div> <p data-bbox="331 743 510 970">Working together with other partners to deliver objectives</p>	<p data-bbox="544 317 1317 504">The Preferred Strategy 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, and the growth and spatial options.</p> <p data-bbox="544 531 1283 722">Pre-deposit 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.</p> <p data-bbox="544 750 1312 1174">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 seven in person drop-in sessions at various settlements across the County. The responses received to this engagement/consultation have shaped the amendments to the Preferred Strategy. Further consideration will be given to the responses to the Preferred Strategy relating to the issues, vision, objectives and strategic policies and any changes will be included in the Deposit Plan for scrutiny in Spring 2024.</p> <p data-bbox="544 1201 1317 1393">Further engagement will take place at the next key stage of the RLDP process – the Deposit Plan. 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.</p>	<p data-bbox="1350 317 2078 387">The RLDP Delivery Agreement ensures full stakeholder /community’s involvement to shape the RLDP.</p> <p data-bbox="1350 430 2101 855">We engaged/consulted on the Preferred Strategy including; Member involvement, two virtual events for members of the public, a virtual event for Town and Community Councils and seven in person drop-in sessions at various settlements across the County. The responses received to this engagement/consultation have shaped the amendments to the Preferred Strategy. Further consideration will be given to the responses to the Preferred Strategy relating to the issues, vision, objectives and strategic policies and any changes will be included in the Deposit Plan for scrutiny in Spring 2024.</p> <p data-bbox="1350 898 2089 968">Further engagement will take place at the next key stage of the RLDP process – the Deposit Plan.</p>

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?
 <p>Involving those with an interest and seeking their views</p>	<p>The Preferred Strategy 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, and the growth and spatial options.</p> <p>Pre-deposit 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.</p> <p>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.</p>	<p>The revised Delivery Agreement ensures full stakeholder /community's involvement to shape the RLDP.</p> <p>We engaged/consulted on the Preferred Strategy including; Member involvement, two virtual events for members of the public, a virtual event for Town and Community Councils and seven in person drop-in sessions at various settlements across the County. The responses received to this engagement/consultation have shaped the amengments to the Preferred Strategy. Further consideration will be given to the responses to the Preferred Strategy relating to the issues, vision, objectives and strategic policies and any changes will be included in the Deposit Plan for scrutiny in Spring 2024.</p> <p>Further enegagment will take place at the next key stage fo the RLDP process – the Deposit Plan.</p>

<p>Sustainable Development Principle</p>	<p>Does your proposal demonstrate you have met this principle? If yes, describe how. If not explain why.</p>	<p>Are there any additional actions to be taken to mitigate any negative impacts or better contribute to positive impacts?</p>
<div data-bbox="120 408 322 612"> </div> <p data-bbox="152 624 293 651">Prevention</p> <p data-bbox="342 379 504 683">Putting resources into preventing problems occurring or getting worse</p>	<p>The Preferred Strategy 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, and ensuring our communities are socially and economically sustainable by attracting and retaining younger people to rebalance our ageing demographic.</p>	<p>The Preferred Strategy 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.</p> <p>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 amended the project timetable for Plan preparation, was reported to Council in December 2022 alongside the Preferred Strategy.</p>

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?
 <p>Considering impact on all wellbeing goals together and on other bodies</p>	<p>The Preferred Strategy sets out the level of growth for housing/employment and the spatial distribution of this growth across the County. The Preferred Strategy 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 Preferred Strategy 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, strategic policies and preferred strategic site allocations in order to ensure that the Plan will be promoting sustainable development.</p> <p>The Preferred Strategy 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.</p>	<p>The Preferred Strategy 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, strategic policies and preferred strategic site allocations in order to ensure that the Plan will be promoting sustainable development.</p> <p>We will continue to work closely with our neighbours, both in Wales and England, including the joint procurement of evidence as applicable.</p> <p>The RLDP will align with the new Integrated Network Maps for Active Travel, and the Deposit Plan will be accompanied by an Infrastructure Plan, revised Local Transport Plan and Economic Development Strategy.</p> <p>The Deposit Plan (the next key stage of the process) will be subject to an ISA, as above. This will ensure the Plan is promoting sustainable development.</p>

[Type here]

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

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7. What evidence and data has informed the development of your proposal?

A range of evidence and data has been used to inform the Updated Preferred Strategy, from a wide range of sources both internal and external to the Council, including:

- Consultation responses to the Preferred Strategy (December 2022) and Candidate Sites Register RLDP Preferred Strategy (December 2022)
- Updated housing data (2022/23)
- Monmouthshire Local Development Plan Annual Monitoring Reports (2014- 2022) <https://www.monmouthshire.gov.uk/planning-policy/annual-monitoring/ldp-annual-monitoring-report>
- Integrated Sustainability Appraisal Report (AECOM, November 2022)
- HRA of the Monmouthshire RLDP Preferred Strategy (AECOM, November 2022)
- RLDP revised Delivery Agreement (December 2022)
- Monmouthshire RLDP Demographic Update Report (Edge Analytics, November 2021)
- Sustainable Settlements Appraisal (Updated December 2022)
- Growth and Spatial Options Paper (September 2022)
- Candidate Sites High Level Assessment (August 2022)
- Monmouthshire RLDP Candidate Sites Register (February 2022) [Monmouthshire Replacement Local Development Plan Candidate Sites Register \(Electoral Wards 2022\) - Monmouthshire](#)
- Local Housing Market Assessment 2020-2025

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](#)

[Type here]

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 updated Preferred Strategy 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 homes, 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. 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.

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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
Recommend that Place Scrutiny Committee scrutinises proposed post-consultation amendments to the Replacement Local Development Plan Preferred Strategy, prior to it being reported to Council on 26 th October 2023 to seek endorsement of the amendments as the basis for preparing the Deposit Plan.	Place Scutiny Committee 28 th September 2023.	Head of Placemaking, Regeneration, Highways and Flooding Head of Planning Planning Policy Team
Seek Council's endorsement of the amendemnts to the Replacement Local Development Plan (RLDP) Preferred Strategy as a basis for preparing the Deposit Plan.	Council 26 th October 2023.	Head of Placemaking, Regeneration, Highways and Flooding Head of Planning Planning Policy Team

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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 10 th May 2018
1.0	Issues, Vision and Objectives scrutiny	01/02/2019	Draft for Economy & Development Select Committee 14 th February 2019
1.1	Issues, Vision and Objectives endorsement following consultation	09/04/2019	Draft for Cabinet 5 th June 2019
1.2	Issues, Vision and Objectives endorsement following consultation	14/06/2019	Amended for Cabinet 3 rd July 2019 to reflect 16 th May 2019's Climate Emergency declaration by Council
2.0	Growth and Spatial Options endorsement to consult	07/06/2019	Draft for Cabinet 3 rd July 2019
2.1	Growth and Spatial Options scrutiny	09/07/2019	Draft for Economy & Development Select Committee 17 th July 2019
3.0	Preferred Strategy endorsement to consult	11/12/2019	Draft for Council report 5 th 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.	07/10/2020	Timetable amended further to account for Covid-19 pandemic and revised Welsh Government population and household projections.

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5.0	Revised Growth and Spatial Options scrutiny	17/11//2020	Draft for Economic Development Select Committee 10 th 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 16 th December 2020
6.0	Preferred Strategy Consultation endorsement to consult.	24/06/2021	Draft for Council Report 24 th 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 27 th 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 27 th 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 1 st 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 1 st December 2022

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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 26 th 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
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Monmouthshire's Scrutiny Forward Work Programme 2023-24

Place Scrutiny Committee				
Meeting Date	Subject	Purpose of Scrutiny	Responsibility	Type of Scrutiny
28 th September 2023	Replacement Local Development Plan Preferred Strategy	To scrutinise the RLDP Preferred Strategy, including any proposed changes arising from the public consultation.	Mark Hand Paul Griffiths	Pre-decision Scrutiny
Workshop	Economic Development Strategy Update	To consider progress ahead of Cabinet decision in October.	Craig O'Connor	Scrutiny Workshop
Workshop	Local Transport Plan Update	To consider progress ahead of Cabinet decision in October.	Craig O'Connor	Scrutiny Workshop
Tuesday 10th October - Workshop	RLDP update	To consider progress ahead of an informal Cabinet paper.	Craig O'Connor	Scrutiny Workshop
9 th November 2023	Community Improvement Team	To scrutinise the team's operations and organisation.	Carl Touhig Nigel Leaworthy Catrin Maby	Policy Development
	Economic Development Strategy	To scrutinise the Monmouthshire Business Growth & Enterprise Strategy and action plan in setting the economic ambition for the county.	Hannah Jones James Woodcock Paul Griffiths	Pre-decision Scrutiny
	Local Transport Policy	To scrutinise the Local Transport Plan.	Deb Hill Howells Catrin Maby	Pre-decision Scrutiny
14 th December 2023	School Meals Procurement	Scrutiny of the council's school meals procurement and its contribution to deforestation. (Osbaston Primary)	Deb Hill-Howells Scott James	Policy Development

Monmouthshire's Scrutiny Forward Work Programme 2023-24

Place Scrutiny Committee				
Meeting Date	Subject	Purpose of Scrutiny	Responsibility	Type of Scrutiny
	Pavement Café Policy	To scrutinise the pavement café policy as the basis for making decisions on applications for licences.	Mark Hand Paul Griffiths	Policy Development
Special Meeting – 11th January 2024	Climate and Nature Emergency Strategy	To scrutinise progress of the strategy prior to Cabinet decision.	Hazel Clatworthy Catrin Maby	Policy Development
	Electric Vehicle Charging Strategy	To scrutinise progress of the strategy prior to Cabinet decision.	Deb Hill-Howells Ian Hoccom Catrin Maby	Pre-decision Scrutiny
1st February 2024	Scrutiny of the Budget Proposals	Scrutiny of the budget mandates relating to the committee's remit.	Peter Davies Jonathan Davies Rachel Garrick	Budget Scrutiny
	Public Spaces Protection Order Dog Controls	To scrutinise the latest report.	Huw Owen David Jones	Policy Development
14th March 2024	Local Flood Strategy	Pre-decision scrutiny of adoption of the Local Flood Strategy.	Mark Hand Catrin Maby	Pre-decision Scrutiny

Monmouthshire's Scrutiny Forward Work Programme 2023-24

Place Scrutiny Committee				
Meeting Date	Subject	Purpose of Scrutiny	Responsibility	Type of Scrutiny
10 th April 2024	Scrutiny of STEAM	Scrutiny of 2022 Monmouthshire STEAM (tourism volume and value) figures.	Nicola Edwards Matthew Lewis	Policy Development
	Replacement Local Development Plan	To scrutinise the RLDP Deposit Plan prior to Council endorsement for public consultation.	Mark Hand Paul Griffiths	Pre-decision Scrutiny
To be confirmed (moved from 9th Nov)	Destination management Plan	To conduct pre-decision scrutiny.	Matthew Lewis	Pre-decision Scrutiny
September 2024	Monmouth Placemaking Plan	To conduct pre-decision scrutiny.	Mark Hand Paul Griffiths	Pre-decision Scrutiny
	Magor Placemaking Plan	To conduct pre-decision scrutiny.	Mark Hand Paul Griffiths	Pre-decision Scrutiny
	Abergavenny Placemaking Plan	To conduct pre-decision scrutiny prior to adoption of Plan by Cabinet.	Mark Hand Paul Griffiths	Pre-decision Scrutiny
To be confirmed (pending WG Road safety Strategy expected November 2023)	Road Safety Strategy	To scrutinise the Road Safety Strategy.	Mark Hand Catrin Maby	Pre-decision Scrutiny

Monmouthshire's Scrutiny Forward Work Programme 2023-24

Place Scrutiny Committee				
Meeting Date	Subject	Purpose of Scrutiny	Responsibility	Type of Scrutiny
To be confirmed	Monlife Heritage Strategy		Tracey Thomas	
To be confirmed	Active Travel Plans	Across Highways and MonLife		
November Workshop	Affordable housing		Craig O'Connor	Scrutiny Workshop
December Workshop	Climate Change and Net Zero ready homes		Craig O'Connor	Scrutiny Workshop
January Workshop	Renewables		Craig O'Connor	Scrutiny Workshop
February Workshop	Retail		Craig O'Connor	Scrutiny Workshop
March Workshop	Tourism		Craig O'Connor	Scrutiny Workshop
April Workshop	Deposit Plan		Craig O'Connor	Scrutiny Workshop