

# Public Document Pack



Neuadd y Sir  
Y Rhadyr  
Brynbuga  
NP15 1GA

Dydd Gwener, 9 Mawrth 2018

**Hysbysiad o gyfarfod:**

## **Cyngor Sir**

**Dydd Llun, 19eg Mawrth, 2018 at 2.00 pm,  
Council Chamber - Council Chamber**

### **AGENDA**

*Prayers will be said prior to the Council meeting at 4.55pm. All members are welcome to join the  
Chairman for prayers should they wish to do.*

<b>Eitem No</b>	<b>Eitem</b>	<b>Tudalennau</b>
1.	Ymddiheuriadau am absenoldeb	
2.	Datganiadau o Fuddiant	
3.	Cynllun Busnes Y Fargen Ddinesig	1 - 72
4.	Cynllun Datblygu Lleol	73 - 452

**Paul Matthews  
Prif Weithredwr**

## CYNGOR SIR FYNWY

MAE CYFANSODDIAD Y PWYLLGOR FEL SY'N DILYN:

Cynghorwyr Sir:

D. Batrouni  
D. Blakebrough  
M. Powell  
V. Smith  
P. Clarke  
D. Dovey  
A. Easson  
R. Edwards  
D. Evans  
P.A. Fox  
R.J.W. Greenland  
L. Guppy  
R. Harris  
J. Higginson  
G. Howard  
S. Howarth  
D. Jones  
P. Jones  
S. Jones  
S.B. Jones  
P. Jordan  
P. Murphy  
B. Strong  
F. Taylor  
A. Watts  
A. Webb  
K. Williams  
J.Becker  
L.Brown  
A.Davies  
L.Dymock  
M.Feakins  
M.Groucutt  
R.John  
L.Jones  
M.Lane  
P.Pavia  
J.Pratt  
R.Roden  
T.Thomas  
J.Treharne  
J.Watkins  
S. Woodhouse

**Gwybodaeth Gyhoeddus**

### **Mynediad i gopiâu papur o agendâu ac adroddiadau**

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

### **Edrych ar y cyfarfod ar-lein**

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

### **Y Gymraeg**

Mae'r Cyngor yn croesawu cyfraniadau gan aelodau'r cyhoedd drwy gyfrwng y Gymraeg neu'r Saesneg. Gofynnwn gyda dyledus barch i chi roi 5 diwrnod o hysbysiad cyn y cyfarfod os dymunwch siarad yn Gymraeg fel y gallwn ddarparu ar gyfer eich anghenion.

# Nodau a Gwerthoedd Cyngor Sir Fynwy

## Ein diben

Adeiladu Cymunedau Cynaliadwy a Chydnerth

### Amcanion y gweithiwn tuag atynt

- Rhoi'r dechrau gorau posibl mewn bywyd i bobl
- Sir lewyrchus a chysylltiedig
- Cynyddu i'r eithaf botensial yr amgylchedd naturiol ac adeiledig
- Llesiant gydol oes
- Cyngor gyda ffocws ar y dyfodol

## Ein Gwerthoedd

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

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

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

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

<b>SUBJECT:</b>	<b>CARDIFF CAPITAL REGION CABINET: JOINT WORKING AGREEMENT BUSINESS PLAN</b>
<b>MEETING:</b>	<b>SPECIAL COUNCIL</b>
<b>DATE:</b>	<b>19<sup>TH</sup> MARCH 2018</b>
<b>DIVISION/WARDS AFFECTED:</b>	<b>ALL</b>

## NON-PUBLICATION

### 1. PURPOSE:

- 1.0 To outline the next steps for the Cardiff Capital Region City Deal further to the approval of the Cardiff Capital Region (CCR) Joint Working Agreement ('JWA'), the CCR City Deal Assurance Framework and Implementation Plan and the establishment of the Regional Cabinet on the [26 January 2017](#).
- 1.1 To present the Joint Working Agreement Business Plan (JWA Business Plan) attached, which is recommended to you for approval by the Regional Cabinet.

### 2. RECOMMENDATIONS:

- 2.0 That Council approves the Joint Working Approval Business Plan as recommended by the Regional Cabinet for adoption as the formal 'JWA Business Plan'.

### 3. KEY ISSUES

- 3.0 The JOINT WORKING AGREEMENT (JWA), in relation to the delivery of the CCR City Deal, was signed and the Regional Cabinet established on March 1st, 2017. The JWA requires the constituent Councils to take a subsequent decision, as a "Matter Reserved to The Councils", on the approval and adoption of the draft JWA Business Plan.
- 3.1 The JWA requires the Regional Cabinet to:  
"..... No later than twelve (12) months after the Commencement Date, prepare (or procure the preparation of), finalise (acting in the best interests of the Joint Committee) and recommend for agreement and adoption by the Councils the draft JWA Business Plan which shall

comply with the provisions of Clause 7.1.4 below. The intention is to create an overarching five (5) year JWA Business Plan that, amongst other matters, shall set out the Councils objectives and priorities for the delivery of the City Deal that is updated annually.”

3.2 Clause 7.1.4 of the JWA providing that:

The JWA Business Plan shall, amongst other matters, address the following:

- a) the updated Affordability Envelope; (see section 9 of the JWA Business Plan);
- b) the methodology for agreeing the nature, scope and prioritisation of projects to be developed for the overall benefit of the Cardiff Capital Region (in accordance with the terms of the Implementation Plan); (see section 3 of the JWA Business Plan);
- c) the methodology and responsibility for any external audits in relation to this Agreement; (see section 9 of the JWA Business Plan);
- d) the methodology and responsibility of any performance monitoring along with any performance indicators to enable the Joint Committee to measure progress against the JWA Business Plan (see section 3 of the JWA Business Plan); and
- e) any revenue and capital monitoring reports to be prepared for the Joint Committee and the frequency of such reports. (see section 9 of the JWA Business Plan)

3.3 For clarity and cross reference to the JWA, the draft JWA Business Plan is now referred to as the ‘CCR Strategic Business Plan for the Wider Investment Fund’, to reflect its status and focus, and is titled accordingly on the attached Appendix A.

Page 2

**Proposal**

3.4 In accordance with the requirements of the JWA the draft JWA Business Plan contains:

- The Strategic Context which includes:
  - Our Vision; and Strategic Objectives (see section 2 of the JWA Business Plan);
- Our Approach (see section 3 of the JWA Business Plan);
- Spatial Priorities (see section 4 of the JWA Business Plan);
- Our Strategic Themes (Programme Themes ) which include:
  - Skills and Employment; (see section 5 of the JWA Business Plan)
  - Innovation; (see section 6 of the JWA Business Plan)
  - Connecting the Region; (see section 7 of the JWA Business Plan) and
  - Regeneration and Infrastructure. (see section 8 of the JWA Business Plan);
- Indicative Five Year Spend Profile (see section 9 of the JWA Business Plan);
- Additional Opportunities for Regional Funding (see section 10 of the JWA Business Plan).

- 3.6 The draft JWA Business Plan identifies, and provides some detail on, emerging opportunities which will be considered and developed within the life of the plan:
- Skills for the Future;
  - Innovation Portfolio;
  - Metro Plus;
  - Digital Portfolio;
  - Housing Investment Fund; and
  - Strategic Sites.
- 3.7 The Plan, which will take the City Deal past its first Gateway Review, due in December 2020, also indicates that other proposals will emerge, within the life of the plan, all of which will be rigidly assessed in accordance with the Assurance Framework.
- 3.8 **Cardiff Capital Region Wider Investment Fund**  
The City Deal provides funding to support schemes which will stimulate the economic growth of the region. The agreement with the UK Government and Welsh Government provides £1.2 billion of which £734m is allocated to the Metro, with the balance of £495m being made available as the 'Wider Investment Fund'.
- 3.8.1 **The Wider Investment Fund is made up of:**
- £375m grant from the UK Government paid over 20 years, HMT Contribution, with year 1-5 being £50m revenue grant, followed by years 6-20 being £325m capital grant; and
  - £120m Local Authority Partnership capital contribution to be drawn down as required.
- 3.8.2 The Regional Cabinet have stated that the high level aims of the Wider Investment Fund are the creation of 25,000 new jobs and £4bn of private sector investment. The first investment has been made in the Compound Semi-conductor Project, providing a loan of £38.5m, to be repaid, which has the potential to generate 2,000 jobs and over £380m of private sector investment.
- 3.8.3 As the JWA Business Plan has not yet been adopted the Regional Cabinet have substantially funded this initial investment by use of the HMT Contributions received to date. As these funds are revenue it is hoped that the adoption of the JWA Business Plan will take place in financial year 2017/2018 allowing Local Authority Partnership capital contributions to be substituted for the revenue grant, thereby protecting the revenue funding for future use on schemes and programmes which are revenue intensive such as skills. Funding of the Local Authority Partnership capital contributions will be based on the council contributions agreed and contained in the JWA.
- 3.8.4 Following this initial investment, the Regional Cabinet have agreed in principle to support a number of schemes:

- The Metro Central Project;
- Regional Housing Investment Fund;
- Digital Strategy; and
- Skills for the Future.

3.8.5 These ‘in-principle’ schemes, along with others which may emerge, will be developed and assessed to ensure they comply with the City Deal Assurance Framework, contribute to the sustainable economic growth of the region, and demonstrate value for money prior to any implementation investment being made.

3.8.6 This method of identifying, developing, assessing and approving schemes ensures that the Regional Cabinet have the flexibility to ensure investments accurately reflect the needs and encourage the continued development of the region. However, it does also mean that it is difficult to predict accurately the financial implications of the investment programme. Financial modelling for the Wider Investment Fund will therefore be based on educated assumptions and an indicative programme of investment which will developed and refined as more investment decisions are made.

#### **4. OPTIONS APPRAISAL**

4.0 The economy of South East Wales continues to underperform the majority of other regions of the UK. The ten constituent councils acknowledge the need to act collectively and differently to accelerate the economic growth of the CCR. On 15th March 2016, each of the ten constituent council leaders in South East Wales, the First Minister, the Wales Government Minister for Finance and Government Business, the Secretary of State for Wales and the Chief Secretary to the Treasury signed the CCR Heads of Terms Agreement. The City Deal is therefore an agreement between the UK Government, Wales Government and the ten leaders of the CCR.

4.1 To ensure the right investments are made to achieve significant economic growth the CCR City Deal has set a small number of key targets, which are the creation of 25,000 new jobs by 2036 and leveraging £4 billion of private sector investment as a result of the £1.2bn public sector investment.

4.2 Senior personnel and the Leader have taken an active role in shaping the CCR Programme of activities to date and the JWA Business Plan is the next step in achieving the long-term objectives of the CCR City Deal, outlining the required actions and outcomes of the CCR City Deal, and how the £495million ‘Wider Investment Fund’ will be used over the next five years to drive the actions forward.

#### **5. EVALUATION CRITERIA**

5.1 An evaluation assessment has been included in Appendix B for future evaluation of whether the decision has been successfully implemented.



**6. REASONS:**

6.0 To agree a formal JWA Business Plan in accordance with the requirements of the JWA, a decision for which is a “Matter Reserved to each of the Councils”.

**7. RESOURCE IMPLICATIONS:**

7.0.1 The CCR City Deal Investment Fund comprises two distinct elements:-

**£734m – METRO scheme.** This will comprise £503m, Welsh Government funding provided over the first seven years of the Investment Fund, from 2016/17 to 2022/23; £106 million from the European Development Fund and £125k from UK Government.

**£495m – Regional Cabinet Fund,** comprising the ten constituent councils’ commitment to borrow £120 million over the 20 year period of the Investment Fund, together with the £375m from UK Government, for investment in infrastructure, housing, skills and training, innovation, business growth and “Metro plus” transport proposals.

7.0.2 The £375m of funding provided by the UK Government to the Regional Cabinet Fund, is funded on a staged basis over 20 years, £10m a year over the first 5 years, £21m a year over the following 5 years and £22m a year over the remaining 10 years. Therefore, if the Regional Cabinet is to generate the economic improvement the region requires, it is likely that investments will be made early in the life of the Fund and the ten constituent councils will have to borrow funding to cover the temporary shortfall in funding from the UK Government. This is called the carry costs of the funding.

7.0.3 The s151 officers have modelled a number of potential scenarios, agreeing appropriate assumptions in respect of variables such as the profile of likely spend, interest rates for borrowing, the split of capital and revenue funding and the treatment of inflation. The result of this detailed work is a funding model which still presumes Council contributions spread between 10 partners of £120m. The latest proposal is that, should the JWA be approved, the incidence of Council contributions will be revised and front ended in order to better protect and retain HMT funding for revenue projects. MCC’s contribution based on relative population is still 6.1% of total equating to £7.37m, as supplied in the table that follows:

		2016 /17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27
		1	2	3	4	5	6	7	8	9	10	11
<b>Section 1: Capital Budgets (Individual)</b>												
	%											
Blaenau Gwent	4.6	-	1,118.4	817.9	233.5	233.5	367.8	367.8	601.2	601.2	601.2	601.2
Bridgend	9.4	-	2,285.2	1,671.2	477.2	477.2	751.4	751.4	1,228.3	1,228.3	1,228.3	1,228.3
Caerphilly	12.0	-	2,897.5	2,119.0	605.0	605.0	952.8	952.8	1,557.4	1,557.4	1,557.4	1,557.5
Cardiff	23.7	-	5,744.0	4,200.6	1,199.4	1,199.4	1,888.8	1,888.8	3,087.4	3,087.4	3,087.4	3,087.5
Merthyr Tydfil	3.9	-	954.1	697.7	199.2	199.2	313.7	313.7	512.8	512.8	512.8	512.8
Monmouthshire	6.1	-	1,487.2	1,087.6	310.5	310.5	489.1	489.1	799.4	799.4	799.4	799.4
Newport	9.8	-	2,376.5	1,737.9	496.2	496.2	781.5	781.5	1,277.4	1,277.4	1,277.4	1,277.4
Rhondda Cynon Taf	15.8	-	3,818.1	2,792.2	797.3	797.3	1,255.5	1,255.5	2,052.3	2,052.3	2,052.3	2,052.4
Torfaen	6.1	-	1,476.9	1,080.1	308.4	308.4	485.7	485.7	793.9	793.9	793.9	793.9
Vale of Glamorgan	8.5	-	2,052.0	1,500.6	428.5	428.5	674.8	674.8	1,103.0	1,103.0	1,103.0	1,103.0
	<b>100.0</b>	<b>-</b>	<b>24,210.0</b>	<b>17,705.0</b>	<b>5,055.3</b>	<b>5,055.3</b>	<b>7,961.0</b>	<b>7,961.0</b>	<b>13,013.0</b>	<b>13,013.0</b>	<b>13,013.0</b>	<b>13,013.5</b>

7.0.4 Figures supplied in para 7.0.3 take no account of any borrowing costs involved, as some Councils may presume to utilise alternate funding means. However in respect of MCC, the presumption is that this capital contribution will be afforded through borrowing. These revised capital contributions and the resultant minimum revenue provision and interest costs were shared with members during their latest consideration of capital and revenue MTFPs and in their agreement of 2018-19 budget.

7.0.5 As part of the terms of the City Deal, the CCR Cabinet will be required to evaluate the impact of the £495m Investment Fund in order to unlock UK Government funding. Every five years a gateway assessment will be undertaken, which consists of an independent review to evaluate the economic benefits and economic impact of the investments, including whether the projects have been delivered on time and

on budget. The gateway reviews are likely to be structured to occur at Years 5, 10 and 15. Therefore, funding from Year 6 onwards will be subject to the agreed performance objectives being achieved at each of the gateway stages. If a future Investment Fund gateway is not achieved, leading to a reduction or cessation of City deal grant, then it will be the responsibility of the ten constituent councils to manage the financial impact of this within their existing council budgets.

## 7.1 Legal Implications

7.1.1. The body of the report sets out the relevant provisions of the Joint Working Agreement ('JWA') in relation to the JWA Business Plan ('Plan'). They form part of the legal implications, to which regard should be had but to avoid duplication are not repeated in this section.

7.1.2 Pointing out the obvious, the JWA Business plan is a key document in relation to the delivery of the Cardiff Capital Region City Deal (CCRCD). The content of the Plan serving to create a legitimate expectation that the matters referred to (proposals, projects and themes) will be progressed as set out in the Plan. Accordingly, it is important that Regional Cabinet and each constituent council is content with the content of the JWA Business plan. As regards the progression of individual themes and projects, and as stated in the body of the report, matters will need to be considered in accordance with the provisions of the Assurance Framework, at which stage any legal issues raised by a project can be considered and detailed legal advice provided. The Plan refers, section 10, to a case being made for a range of powers to be devolved to the local authorities of the Cardiff Capital Region. To the extent that any further powers are sought to be delegated to the Regional Cabinet, then this will be a matter for each of the Councils comprising the CCRCD to determine.

7.1.3 In considering this matter regard should be had, amongst other matters, to:

(a) the Councils' duties under the Well-being of Future Generations (Wales) Act 2015,

(The Plan noting at section 3 that, '... we (CCRCD) will follow the five ways of working and sustainability principles detailed in the Well-being of Future Generations (Wales) Act 2015, and reflect and support the well-being goals); and

(b) Public sector duties under the Equalities Act 2010 (including specific Welsh public sector duties). Pursuant to these legal duties Councils must in making decisions have due regard to the need to a) eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by that Act; b) advance equality of opportunity between people who share a relevant protected characteristic and those who do not; and c) foster good relations between people who share a protected characteristic and those who do not. Protected characteristics are: a. Age; b. Gender reassignment; c. Sex; d. Race – including ethnic or national origin, colour or nationality; e. Disability; f. Pregnancy and maternity; g. Marriage and civil partnership; h. Sexual orientation; i. Religion or belief – including lack of belief. In Wales, public sector bodies listed are required to take certain steps in order to demonstrate that they have due regard to the public sector equality duty. These Welsh specific equality duties include assessing the impact of policies and procedures on equality (often called Equality Impact-Assessment).

**8. WELLBEING OF FUTURE GENERATIONS IMPLICATIONS (INCORPORATING EQUALITIES, SUSTAINABILITY, SAFEGUARDING AND CORPORATE PARENTING):**

8.0 The significant equality impacts identified in the assessment (Appendix C) are summarised below for members' consideration:

The Assessment demonstrates that the detail contained in the draft JWA Business Plan demonstrates compliance with the well-being five ways of working, supports the well-being goals and identifies that the City Deal is expected to have a positive impact on all groups and people with protected characteristics.

**9. CONSULTEES:**

Senior Leadership Team  
Cabinet  
Regional Cabinet

**10. BACKGROUND PAPERS:**

JOINT WORKING AGREEMENT in relation to the delivery of the Cardiff Capital Region City Deal

**11. AUTHOR:**

Paul Matthews Chief Executive

**12. CONTACT DETAILS:**

Tel: 07939 316181

E-mail: [paulmatthews@monmouthshire.gov.uk](mailto:paulmatthews@monmouthshire.gov.uk)



## Evaluation Criteria – Cabinet, Individual Cabinet Member Decisions & Council (Appendix B)

<b>Title of Report:</b>	<b>CARDIFF CAPITAL REGION CABINET: JOINT WORKING AGREEMENT BUSINESS PLAN</b>
<b>Date decision was made:</b>	<b>14<sup>th</sup> March 2018</b>
<b>Report Author:</b>	<b>Cath Fallon</b>

### **What will happen as a result of this decision being approved by Cabinet or Council?**

What is the desired outcome of the decision?  
What effect will the decision have on the public/officers?

A formal JWA Business Plan will be approved in accordance with the requirements of the JWA, the decision of which is a “Matter Reserved to each of the Councils”. The decision enables the Regional Cabinet to move forward with CCR programme delivery.

### **What benchmarks and/or criteria will you use to determine whether the decision has been successfully implemented?**

Think about what you will use to assess whether the decision has had a positive or negative effect:  
Has there been an increase/decrease in the number of users  
Has the level of service to the customer changed and how will you know  
If decision is to restructure departments, has there been any effect on the team (e.g. increase in sick leave)

Decision will enable the CCR Regional Cabinet to move forward. Progress will be reported to Cabinet on a regular basis.

### **What is the estimate cost of implementing this decision or, if the decision is designed to save money, what is the proposed saving that the decision will achieve?**

Give an overview of the planned costs associated with the project, which should already be included in the report, so that once the evaluation is completed there is a quick overview of whether it was delivered on budget or if the desired level of savings was achieved.

The cost of implementing this decision was previously agreed in January 2017, Monmouthshire's share (6.1%) of the estimated total costs is projected to be in the order of £12.9m over a 25 year period (based on an assumed average asset life).

**Any other comments**



## Future Generations Evaluation (includes Equalities and Sustainability Impact)

<p><b>Name of the Officer</b> Cath Fallon</p> <p><b>Phone no:</b> 07557 190969  <b>E-mail:</b> <a href="mailto:cathfallon@monmouthshire.gov.uk">cathfallon@monmouthshire.gov.uk</a></p> <p><b>Name of Service:</b> Enterprise and Innovation</p>	<p><b>CARDIFF CAPITAL REGION CABINET: JOINT WORKING AGREEMENT BUSINESS PLAN</b></p> <p><b>Date:</b> Future Generations Evaluation 26<sup>th</sup> February 2018</p>
--	---

Page 11

***NB. Key strategies and documents that may help you identify your contribution to the wellbeing goals and sustainable development principles include: Single Integrated Plan, Continuance Agreement, Improvement Plan, Local Development Plan, People Strategy, Asset Management Plan, Green Infrastructure SPG, Welsh Language Standards, etc.***

**1. Does your proposal deliver any of the well-being goals below?**

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><b>A prosperous Wales</b> Efficient use of resources, skilled, educated people, generates wealth, provides jobs</p>	<p>The Regional Cabinet’s Vision and Regional Strategic Objectives set out their aspirations and with their high-level aims, to create 25,000 new jobs and leverage £4bn private sector investment, establish the economic outcomes they are seeking to achieve when considering use of the City Deal Wider Investment Fund. The Regional Strategic Objectives also reflect the need to focus on improving the quality of life of people and communities now and in the future and</p>	<p>In accordance with the Assurance Framework all proposed schemes will demonstrate their potential outputs and outcomes via a 5 Case Business Model, in accordance with HM Treasury Green Book, a tool for scoping and planning a proposal and documenting the expected outcomes.</p> <p>In addition, for Cardiff Capital Region schemes, the business case will also have to demonstrate the use</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>ensure the Regional Cabinet's approach and actions are responsible and meet the regions current needs without compromising the quality of life of future generations.</p> <p>The Strategic Objectives, as detailed in the Strategic Business, are:</p> <ol style="list-style-type: none"> <li>1. <b>Prosperity and Opportunity ; Building the capacity of individuals, households, public sector and businesses to meet challenges and grasp opportunity creating a more productive economy;</b></li> <li>2. <b>Inclusion and Equality - A vibrant and sustainable economy which contributes to the well-being and quality of life of people and communities now and in the future;</b></li> <li>3. <b>Identity, Culture, Community and Sustainability - Forging a clear identity and strong reputation as a City-Region for trade, innovation, and quality of life;</b></li> </ol> <p>Using these Strategic Objectives will assist the Regional Cabinet in supporting the well-being goal of 'a prosperous Wales'.</p>	<p>of the five well-being ways of working and how it supports the wellbeing goals and the twin goals in the Welsh Government's 'Prosperity for All: economic action plan' of growing the economy and reducing inequality. Any report to the Regional Cabinet seeking approval for a proposal will be require to be accompanied by a City Deal Well-being and Equalities Assessment. In this way the Regional Cabinet will ensure that any interventions and/or investments will aim to maximise its positive impact on communities and the well-being goals.</p>
<p><b>A resilient Wales</b> Maintain and enhance biodiversity and ecosystems that support resilience and can adapt to change (e.g. climate change)</p>	<p>The Regional Cabinet, as decision makers, will need to consider existing and future demands which will include new forms of sustainable energy generation, housing, new infrastructure, and facilities which will generate job opportunities such as strategic sites.</p>	<p>See the way of working detailed above and how the approach by the Regional Cabinet will seek to support the regions communities and the wellbeing goals.</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>In response to these pressures the Regional Cabinet will seek appropriate advice, and work in a way that ensures efficient and effective solutions that not only maintain the environment but where ever possible enhance it and make it more resilient, supporting economic growth with responsible environmental management.</p>	
<p><b>A healthier Wales</b> People’s physical and mental wellbeing is maximised and health impacts are understood</p>	<p>There is a clear evidence base that shows that for the majority of people being in good secure work is better for their health than being out of work. Employment has social, psychological, and financial benefits that improve health.</p> <p>The Regional Cabinet’s aims, as detailed in the Strategic Business Plan, and Strategic Objectives, to create additional good quality jobs and support people to up skill to fill those roles will assist in supporting the well-being goal of ‘a healthier Wales’.</p>	<p>See the way of working detailed above and how the approach by the Regional Cabinet will seek to support the regions communities and the wellbeing goals.</p>
<p><b>A Wales of cohesive communities</b> Communities are attractive, viable, safe and well connected</p>	<p>The details in the Strategic Objectives related to connectivity, transport and digital; vibrant and vital economy and urban centres; and affordable housing will all contribute to support this goal.</p> <p>Therefore, using the Strategic Objectives, detailed above, will assist the Regional Cabinet in supporting the well-being goal of ‘a Wales of cohesive communities’.</p>	<p>See the way of working detailed above and how the approach by the Regional Cabinet will seek to support the regions communities and the wellbeing goals.</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><b>A globally responsible Wales</b> Taking account of impact on global well-being when considering local social, economic and environmental wellbeing</p>	<p>The Strategic Business Plan states that the City Deal is intended to deliver sustainable economic development and growth. The Plan also refers to our role on the international and national stage forging a clear identity and strong reputation.</p> <p>This is referenced in “Strategic Objective 3 – <i>demonstrate our commitment to a sustainable future and acknowledge our global responsibility</i>”.</p> <p>The Regional Cabinet understand that sustainability goes beyond the region and must be considered in a national, international and global context. In making decisions the Regional Cabinet’s responsibility extends far wider than the region, and to achieve the aim of a positive national and international reputation, they will consider the full range of potential implications and consequences.</p>	<p>See the way of working detailed above and how the approach by the Regional Cabinet will seek to support the regions communities and the wellbeing goals.</p>
<p><b>A Wales of vibrant culture and thriving Welsh language</b> Culture, heritage and Welsh language are promoted and protected. People are encouraged to do sport, art and recreation</p>	<p>The Strategic Objective ‘<i>Identity, Culture, Community and Sustainability</i>’ specifically refers to the development and promotion of the regions world-class cultural and recreational opportunities exploiting the regions natural beauty and historic areas.</p> <p>Therefore, using the Strategic Objectives, detailed above, will assist the Regional Cabinet in supporting the well-being goal of ‘a Wales of vibrant culture and thriving Welsh language’. Regard will be given to the Welsh Language Measure 2011 and consultation and communication will have regard to the Welsh Language.</p>	<p>See the way of working detailed above and how the approach by the Regional Cabinet will seek to support the regions communities and the wellbeing goals.</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><b>A more equal Wales</b> People can fulfil their potential no matter what their background or circumstances</p>	<p>The Strategic Objective '<i>Inclusion and Equality</i>' detailed in the Strategic Business Plan states: <i>Inclusion and Equality - A vibrant and sustainable economy which contributes to the well-being and quality of life of people and communities now and in the future.</i> A vibrant and inclusive economy supports a mix of economic activities and promotes economic security and resilience. The Regional Cabinet will promote:</p> <ul style="list-style-type: none"> <li>• access to employment and economic opportunities;</li> <li>• participation in the labour market for all members of society;</li> <li>• access to a range of housing, including affordable;</li> <li>• access to education and training, to develop skills;</li> <li>• access to social and recreational opportunities.</li> </ul> <p>Using this Strategic Objective will assist the Regional Cabinet in supporting the well-being goal of 'a more equal Wales'.</p>	<p>See the way of working detailed above and how the approach by the Regional Cabinet will seek to support the regions communities and the wellbeing goals.</p>


**2. 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?

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 Strategic Business Plan states:  <i>“The City Deal is a long-term programme and no one can, with confidence, predict what changes will occur over the next 20 years.            When considering the current pace of innovation in areas such as artificial intelligence, drones, driverless vehicles, 3-D printing, robotics, and automation, the future infrastructure and skills needs of the region is changing radically.            We must therefore ensure our policies, plans and programmes are flexible and sufficiently dynamic to not only cope with change but to act as a catalyst to drive positive change in the region.”</i>            The Plan also states:  <i>“Our Regional Strategic Objectives also reflect the need to focus on improving the quality of life of people and communities now and in the future and ensure our approach and actions are responsible and meet our current needs without compromising the quality of life of future generations.”</i></p>	<p>The business plan demonstrates that the Regional Cabinet are mindful of their responsibilities and that they will regularly undertake reviews to ensure they are achieving the correct balance in the short, medium and long-term.</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>Working together with other partners to deliver objectives</p> <p>Collaboration</p>	<p>The City Deal is a collaboration of the ten local authorities of south east Wales. In defining the Regional Cabinet’s ‘Vision’ there is a statement related to collaboration – “To make the most of the opportunities our combined size gives us, we must all work together – public sector, private sector, education establishments and our communities – for the benefit of all.”</p> <p>In addition, the Strategic Business Plan states:  <i>“We are working closely with the Welsh Government and National Government, who are both signatories to the City Deal. We have also been instrumental in establishing stakeholder groups including the Cardiff Capital Region:</i></p> <ul style="list-style-type: none"> <li>• <i>Skills and Employment Board - representing a wide range of stakeholders, including businesses, higher and further education, local authorities and Welsh Government;</i></li> <li>• <i>Regional Business Council – providing a strong business voice;</i></li> <li>• <i>Economic Growth Partnership – bringing together partners to consider and advise on a sustainable economic growth strategy and investment decisions.</i></li> </ul>	<p>The Regional Cabinet are developing an effective working relationship with the Office of the Future Generations Commissioner for Wales to ensure that opportunities to support the well-being goals are highlighted.</p>
 <p>Involving those with an interest and seeking their views</p> <p>Involvement</p>	<p>The Strategic Business Plan has been prepared using the research and recommendations of the Growth and Competitiveness Commission, as required by the Assurance Framework para 3.1. The Growth and Competitiveness Commission was established as an Independent Commission by the Regional Cabinet specifically to undertake research and extensive consultation on the City Deal, and from this work provide advice and recommendations to the Regional Cabinet.</p>	<p>The Regional Cabinet will be submitting the Strategic Business Plan to each of the regions ten constituent authorities’ councils for approval. This means that up to 536 local councillors all of whom have been elected by and represent their diverse communities, will determine whether to adopt this Business 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>Putting resources into preventing problems occurring or getting worse</p>	<p>The Cardiff Capital Region is widely recognised as a region with major strengths, an attractive environment, a strong heritage, a growing economy and emerging opportunities.</p> <p>However, it is also a region where there are concentrations of poverty and where not all have access to the opportunities available. Improving accessibility to opportunities and increasing labour market participation is critical to support an improved quality of life for all the regions residents.</p>	<p>By investing resources in promoting skills; employment opportunity; job quality, security and progression the Regional Cabinet aim to promote more inclusive growth within the region.</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 Strategic Business Plan states: “We have identified four Strategic Themes where we feel we can make the biggest difference and a real improvement to the wellbeing of people in the region and in so doing support our regional objectives, wellbeing goals and the twin goals, in the Welsh Government’s ‘Prosperity for All: economic action plan’, of growing the economy and reducing inequality.</p> <p>City Deal Strategic Themes:</p> <ul style="list-style-type: none"> <li>• Skills &amp; Employment;</li> <li>• Innovation;</li> <li>• Connecting the Region; and</li> <li>• Regeneration and Infrastructure.</li> </ul> <p>Identifying these themes provides a structure and method of developing proposals and schemes. However, the themes are indivisible, and all proposals will be expected to be cross-cutting and contribute, to differing degrees, to our objectives and the well-being goals.” In addition, when appraising schemes within the City Deal the Strategic Plan states:</p> <p>“All proposed schemes will be required to follow the same appraisal process as detailed in the Assurance Framework.</p> <p>Schemes will be assessed on their potential to contribute to our high-level aims and strategic objectives; demonstrate value for money, use of the five ways of working and how they contribute to the well-being goals.”</p>	<p>Both these statements demonstrate how the Regional Cabinet are taking an integrated approach when developing and assessing proposals and schemes.</p>

**3. 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. For more detailed information on the protected characteristics, the Equality

Act 2010 and the Welsh Language Standards that apply to Monmouthshire Council please follow this link: <http://hub/corporatedocs/Equalities/Forms/AllItems.aspx> or contact Alan Burkitt on 01633 644010 or [alanburkitt@monmouthshire.gov.uk](mailto:alanburkitt@monmouthshire.gov.uk)

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 Regional Cabinet is developing and implementing a City Deal which will benefit the region through the creation of more and better jobs, more housing, improved communication and improved skills. This will provide economic growth and infrastructure improvements that will benefit all including those defined as having protected characteristics.	It is considered that there are no adverse impacts on those with a protected characteristic, indeed the vision and strategic objectives defined in the Strategic Business Plan will assist in supporting these groups as part of the regions communities.	In accordance with the Assurance Framework all proposed schemes will demonstrate their potential outputs and outcomes via a 5 Case Business Model, in accordance with HM Treasury Green Book, a tool for scoping and planning a proposal and documenting the expected outcomes. In addition, for Cardiff Capital Region schemes, the business case will also have to demonstrate the use of the five well-being ways of working and how it supports the wellbeing goals and the twin goals in the Welsh Government's 'Prosperity for All: economic action plan' of growing the economy and reducing inequality. Any report to the Regional Cabinet seeking approval for a proposal will be require to be accompanied by a City Deal Well-being and Equalities Assessment. In this way the Regional Cabinet will ensure that any interventions and/or investments will aim to provide a positive impact on communities and the well-being goals, this will include those who are defined as having protected characteristics.
Disability	As above	As above	As above



<b>Protected Characteristics</b>	<b>Describe any positive impacts your proposal has on the protected characteristic</b>	<b>Describe any negative impacts your proposal has on the protected characteristic</b>	<b>What has been/will be done to mitigate any negative impacts or better contribute to positive impacts?</b>
Gender reassignment	As above	As above	As above
Marriage or civil partnership	As above	As above	As above
Pregnancy or maternity	<i>Any issues raised by pregnant women will seek to be addressed as part of the place based approach to future service delivery.</i>	As above	As above
Race	<i>Any issues raised by racial groups will seek to be addressed as part of the place based approach to future service delivery.</i>	As above	As above
Religion or Belief	<i>Any issues raised by regarding religion or belief will seek to be addressed as part of the place based approach to future service delivery.</i>	As above	As above
Sex	<i>Equal consideration to both men and women will be given throughout the placed based approach to future service delivery.</i>	As above	As above
Sexual Orientation	<i>Full consideration will be given to older and younger people from the Lesbian, Gay and Bi-sexual communities throughout the placed based approach to future service delivery.</i>	As above	As above
Welsh Language	<i>All marketing and promotional materials will be produced bilingually.</i>	As above	As above

4. Council has agreed the need to consider the impact its decisions has on important responsibilities of Corporate Parenting and safeguarding. Are your proposals going to affect either of these responsibilities? For more information please see the guidance <http://hub/corporatedocs/Democratic%20Services/Safeguarding%20Guidance.docx> and for more on Monmouthshire's Corporate Parenting Strategy see <http://hub/corporatedocs/SitePages/Corporate%20Parenting%20Strategy.aspx>

	Describe any positive impacts your proposal has on safeguarding and corporate parenting	Describe any negative impacts your proposal has on safeguarding and corporate parenting	What will you do/ have you done to mitigate any negative impacts or better contribute to positive impacts?
Safeguarding	<i>During the delivery of the programme of activities associated with the policy, safeguarding will be at the forefront to ensure that any future service delivery promotes the well-being of children and vulnerable adults, preventing them from being harmed and protecting those who are at risk of abuse and neglect.</i>	As above	As above
Corporate Parenting	<i>During the delivery of this policy the needs of any 'looked after' children will be considered to ensure any future service delivery protects their welfare.</i>	As above	As above

Page 22

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

The business plan has been founded upon the following:

- The Wellbeing of Future Generations Act;
- The Social Services and Wellbeing (Wales) Act;
- Prosperity for All;
- Growth & Competitiveness Commission Report Review and Recommendations Page 22;
- Cardiff Capital Region "Powering the Welsh Economy"

6. **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?

The Assessment demonstrates that the detail contained in the draft JWA Business Plan demonstrates compliance with the well-being five ways of working, supports the well-being goals and identifies that the City Deal is expected to have a positive impact on all groups and people with protected characteristics.

**7. 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	Progress
JWA Business Plan approved	14 <sup>th</sup> March 2018	Regional Cabinet	

Page 23

**8. MONITORING:** The impacts of this proposal will need to be monitored and reviewed. Please specify the date at which you will evaluate the impact, and where you will report the results of the review.

The impacts of this proposal will be evaluated on:	On going
--	----------

**9. VERSION CONTROL:** The Future Generations Evaluation should be used at the earliest stages of decision making, and then honed and refined throughout the decision making process. It is important to keep a record of this process so that we can demonstrate how we have considered and built in sustainable development wherever possible.

Version No.	Decision making stage	Date considered	Brief description of any amendments made following consideration
1	Cardiff Capital Region (CCR) Joint Working Agreement ('JWA'), the CCR City Deal Assurance Framework and Implementation Plan and the establishment of the Regional Cabinet	26 <sup>th</sup> January 2017	Approval given, no amendments made.

2	<i>JWA Business Plan</i>	<i>14<sup>th</sup> March 2018</i>	



CCR City Deal  
Strategic Business Plan  
Wider Investment Fund

Our Vision:

# A Prosperous Capital City-Region for Wales.





# Contents

---

Chair's Foreword	04
Executive Summary	06
The Strategic Context	10
Our Approach	14
Spatial Priorities	18
Developing a Skilled Workforce and Tackling Unemployment	20
Creating an Innovation District and Increasing Entrepreneurial Activity and Innovation	22
Improving Connectivity Globally, Regionally and Locally	24
Providing the right physical place and environment to support growth	28
Cardiff Capital Region City Deal (CCRCD) Wider Investment Fund	34
Additional Opportunities for Regional Funding: Including European Funding & Additional Flexibilities	44

---

# Chair's Foreword

The Cardiff Capital Region City Deal is a unique programme of collaborative working which will enable economic change, improved digital and physical connectivity, improved skills and educational opportunities, and regeneration across the region.

It is an investment in its people, and aims to bring fairness and opportunities for all, no matter where they live in the region.

It builds on the region's proud heritage, the beauty of our natural landscape, and the vibrancy of our rich cultural and social life.

It will enrich lives in other ways too, reforming our public services, provide new affordable homes, improve family life, and create a workforce which can adapt to the changing needs of the 21st Century.

To do this, the City Deal partners will work together, with a shared vision of a prosperous Capital City-Region for Wales, forging a clear global identity and strong reputation as a City-Region for trade, innovation, and quality of life.

By attracting new investment and growing more successful businesses, by improving our connectivity, by developing our skills and education, we will restore the capital region to its historical role as the “engine room” of the Welsh economy.

**Councillor Andrew Morgan**  
Chair, Cardiff Capital Region City Deal







**“It is an investment in its people, and aims to bring fairness and opportunities for all, no matter where they live in the region.”**

# 01.

## Executive Summary

In compliance with the Joint Working Agreement this 5 year City Deal Strategic Business Plan:

- sets out our current understanding of what is required to achieve our long-term objectives;
- details required actions and outcomes, only some of which will benefit from Wider Investment funding;
- includes details of how the Wider Investment Fund will be used, over the next 5 years, to act as a catalyst to drive these actions forward;
- forms the basis of a more detailed regional strategic economic growth plan and strategy.

We cannot achieve our regional objectives by means of the City Deal funding alone.

However, used wisely to support, encourage and enable regionally significant schemes it will act as a catalyst to:

- drive economic momentum by leverage of wider investments;
- accelerate the process of change;
- attract interest and generate enthusiasm; and
- take advantage of the entrepreneurial talents that abound in our region.

The City Deal is a long-term programme and no one can, with confidence, predict what changes will occur over the next 20 years.

When considering the current pace of innovation in areas such as artificial intelligence, drones, driverless vehicles, 3-D printing, robotics, and automation, the future infrastructure and skills needs of the region is changing radically.

We must therefore ensure our policies, plans and programmes are flexible and sufficiently dynamic to not only cope with change but to act as a catalyst to drive positive change in the region.

The Regional Cabinet, working with partners, who will advise on changes in technology, investments and future markets, will regularly review both the regional economic growth plan and strategy and the use of the Wider Investment Fund to ensure that they continue to accurately reflect and encourage the economic needs and aspirations of the region.



British Airways Maintenance Cardiff, St Athan



Sony UK Technology Centre, Bridgend

---

## The Next 5 Years

---

### Investment

We have made our first investment, in the Compound Semi-conductor Project, which will generate over £380m of private sector investment and deliver 500 highly skilled jobs, and potentially cultivate an innovation cluster creating a further 2,000 Jobs.

### Emerging Opportunities

The Regional Cabinet are proactively pursuing further investment opportunities to assist in meeting our key targets. Those currently identified for development in the next 5 years are:

- **Skills for the Future**  
A regional programme of interventions to provide school engagement, support for businesses and a skills investment fund to deliver over 10,000 additional apprenticeships, graduate internships and upskilled employees. See Section 5 for details.
- **Innovation Portfolio**  
A regional Innovation Portfolio with the aim of developing industry ‘clusters’, new space for innovative start-ups, and incentives to attracting high-tech firms to the region. The first project of this portfolio is currently being implemented, the Compound Semi-conductor Project,

and further development work is being undertaken to optimise this investment and explore other opportunities. See Section 6 for details.

### Metro Plus

Enhancing the potential benefits of the Metro to the region by introducing a programme of complementary transport investments. The initial focus is the development of a Central Transport Interchange ‘Metro Central’ with a key element being the modernisation of Cardiff Central Station. See Section 7 for details.

### Digital Portfolio

A portfolio of digital intervention which seeks to create a digital vision, brand and identity for the region as a ‘smart’ city region able to attract private sector partnership. It would also ensure that digital opportunities are built into other regional schemes and projects. See Section 7 for details.

### Housing Investment Fund

A proposal to establish a fund to support housing growth across the region with a focus on former industrial sites in the Valleys areas and across all tenures to support both economic and social objectives. See Section 8 for details.



## Strategic Sites

A proposed programme to introduce a balanced portfolio of sites with varied characteristics to be a catalyst to attract new and retain existing businesses.

The focus will be to support the regions existing prime market, of Cardiff and the M4 corridor, and expand it to include a mix of opportunity in the Heads of the Valleys corridor, the coastal belt, towns and rural areas.

These 'emerging' opportunities are in varying stages of development and will be rigidly assessed in accordance with the Assurance Framework to establish if they are able to deliver the outputs and outcomes necessary to make them eligible for City Deal funding support.

It is anticipated that further proposals will 'emerge' over the next 5 years and no matter how they are promoted they will comply with the following investment criteria:

---

### All investments will be required to:

---

- Support our Strategic Objectives
- Comply with the Assurance Framework
- Secure regional economic benefits
- Contribute to the high level aims of 25,000 new jobs and £4bn of private sector investment
- Demonstrate Value for Money



## 02. The Strategic Context

<sup>1</sup> Growth & Competitiveness Commission Report Review and Recommendations Page 22.

<sup>2</sup> Cardiff Capital Region “Powering the Welsh Economy”

### Our Vision

“A Prosperous Capital City-Region for Wales” - a decision making centre, a global gateway for capital, trade, and visitors, a knowledge hub and a major population centre and business cluster for Wales<sup>1</sup>

### Our Regional Strategic Objectives

- 1. Prosperity and Opportunity** - Building the capacity of individuals, households, public sector and businesses to meet challenges and grasp opportunity creating a more productive economy
- 2. Inclusion and Equality** - A vibrant and sustainable economy which contributes to the well-being and quality of life of the people and communities in the region now and in the future
- 3. Identity, Culture, Community and Sustainability** - Forging a clear identity and strong reputation as a City-Region for trade, innovation, and quality of life

### Strategic Themes



#### Skills & Employment

Developing a Skilled Workforce and Tackling Unemployment



#### Connecting the Region

Improving Connectivity Globally, Regionally and Locally



#### Innovation

Creating an Innovation District and Increasing Entrepreneurial Activity and Innovation



#### Regeneration & Infrastructure

Providing the right physical place and environment to support growth

### Measuring Success

Job Creation, Private Sector Leverage, Employment and Skill levels, Productivity levels, GVA



Top: Redhouse Cymru, Merthyr Tydfil

Bottom: Springboard Innovation Centre, Cwmbran

---

**To achieve our vision, we must be:<sup>2</sup>**

---

**Ambitious**

Capitalise on our unique identity and our ability to power the Welsh economy. We are a proud Capital City Region in the United Kingdom which gives us a platform to think big.

**Collaborative**

To make the most of the opportunities our combined size gives us, we must all work together - public sector, private sector, education establishments and our communities – for the benefit of all.

**Well-connected**

Realising the potential of our excellent people through world class communications and transport – regionally, nationally and internationally.

---

**To achieve our vision, we must offer:**

---

**A confidence and lifestyle**

Building on the Cardiff Capital Region's reputation as a great place to live, work and play. We are proud of our quality of life, our culture, and the natural beauty we have on our doorstep.

**Sustained success**

A Cardiff Capital Region that is successful economically, socially and environmentally and which benefits all our communities.

**An international and national stage**

Which attracts people and investment from global markets, as well as from other parts of the UK.

**“A decision making centre, a global gateway for capital, trade, and visitors, a knowledge hub and a major population centre and business cluster for Wales.”**

---

## Our Regional Strategic Objectives:

---

### 1. Prosperity and Opportunity

Building the capacity of individuals, households, public sector and businesses to meet challenges and grasp opportunity creating a more productive economy

The quality of the economic environment of the region will play a crucial role in creating jobs by improving business performance, enhancing opportunity and encouraging innovation. We will nurture the economic environment by:

- providing the right infrastructure including connectivity by means of good transport links and high-speed broadband;
- encouraging a culture of innovation and entrepreneurship by providing the right skills, opportunities and support to engender a confidence to be creative;
- assisting the city region’s labour market to be equipped with the skills that businesses need;
- improving public sector efficiency and effectiveness by new ways of working;
- supporting all businesses to become more productive, from small retail to large advanced manufacturers;
- enhancing the business climate for emerging sectors, enterprises and

innovation that can spawn new sources of jobs and incomes into the longer-term future, including creating business clusters where firms can network, share skills and spur each other to higher levels of performance;

- encourage and promote research and development and entrepreneurial enterprise.

### 2. Inclusion and Equality

A vibrant and sustainable economy which contributes to the well-being and quality of life of people and communities now and in the future

A vibrant and inclusive economy supports a mix of economic activities and promotes economic security and resilience.

We will promote:

- assisting our urban centres to be vibrant;
- access to employment and economic opportunities;
- participation in the labour market for all members of society;
- access to a range of housing, including affordable;
- access to education and training, to develop skills;
- access to social and recreational opportunities.



### 3. Identity, Culture, Community and Sustainability

Forging a clear identity and strong reputation as a City-Region for trade, innovation, and quality of life.

For our region to gain attention and respect and effectively compete and attract businesses, tourists, investors, students, entrepreneurs, international sporting and cultural events it requires a clear, credible, appealing and distinctive identity. To promote this identity and reputation we will:

- assist our urban centres to be vibrant and vital with unique identities which all of the regions residents can use and be proud of;
- respect, protect and support our rural and natural environment and use it to promote economic and social outcomes;
- develop and promote our world-class cultural and recreational opportunities utilising the regions natural beauty and historic areas;
- provide a quality environment across the whole region including existing and new development that attracts businesses and talented people;
- demonstrate our commitment to a sustainable future and acknowledge our global responsibility; and
- work with political and commercial partners, at a national, regional and local level to coordinate the promotion of the region.



Penderyn Whisky Distillery, Aberdare

## 03. Our Approach

<sup>3</sup>Written statement by Ken Skates, Cabinet Secretary for Economy and Transport on 11th December 2017

Our Vision and Regional Strategic Objectives set out our aspirations and with our high-level aims, to create 25,000 new jobs and leverage £4bn private sector investment, establish the economic outcomes we are seeking to achieve when considering use of the Wider Investment Fund.

Our Regional Strategic Objectives also reflect the need to focus on improving the quality of life of people and communities now and in the future and ensure our approach and actions are responsible and meet our current needs without compromising the quality of life of future generations.

To focus our approach, support our Assessment Framework and ensure better decision-making, as stated in the Wider Investment Fund Assurance Framework, we will follow the five ways of working and sustainability principles, detailed in the Well-being of Future Generations (Wales) Act 2015, and reflect and support the well-being goals.





We have identified four Strategic Themes where we feel we can make the biggest difference and a real improvement to the well-being of people in the region and in so doing support our regional objectives, well-being goals and the twin goals, in the Welsh

Government's 'Prosperity for All: economic action plan', of growing the economy and reducing inequality<sup>3</sup>.

---

### City Deal Strategic Themes

---

-  **Skills & Employment**
-  **Innovation**
-  **Connecting the Region**
-  **Regeneration and Infrastructure**

Identifying these themes provides a structure and method of developing proposals and schemes. However, the themes are indivisible, and all proposals will be expected to be cross-cutting and contribute, to differing degrees, to our objectives and the well-being goals.



St David's, Cardiff

---

## Partnership and Engagement

---

The City Region will only succeed with all stakeholders working together developing a consensus and shared vision of the way forward.

We are working closely with the Welsh Government and National Government, who are both signatories to the City Deal. We have also been instrumental in establishing stakeholder groups including the Cardiff Capital Region:

- **Skills and Employment Board**
  - representing a wide range of stakeholders, including businesses, higher and further education, local authorities and Welsh Government;
- **Regional Business Council** – providing a strong business voice;
- **Economic Growth Partnership** – bringing together partners to consider and advise on a sustainable economic growth strategy and investment decisions.

We are actively working with the Valleys Taskforce to ensure our aims, objectives and interventions not only align but also complement each other, taking advantage of their engagement processes, to maximise benefits to the region as a whole.

We are developing an effective working relationship with the Office of the Future

Generations Commissioner for Wales to ensure that opportunities to support the well-being goals are highlighted.

The City Region Economic Growth Strategy will go through a comprehensive engagement process and the promoters of all proposed interventions and schemes will be required to demonstrate effective engagement.



---

Ford Manufacturing, Bridgend

---

## Regional Impact, Scheme Appraisal and Monitoring

---

The City Deal Wider Investment Fund is intended to deliver sustainable economic development and growth across the region. This will be pursued by optimising the outcomes we can achieve within the constraints of the resources we have available. Prioritisation is therefore essential, and all proposed interventions must therefore clearly demonstrate a regional and collaborative approach and impact to ensure the effective use of resources.

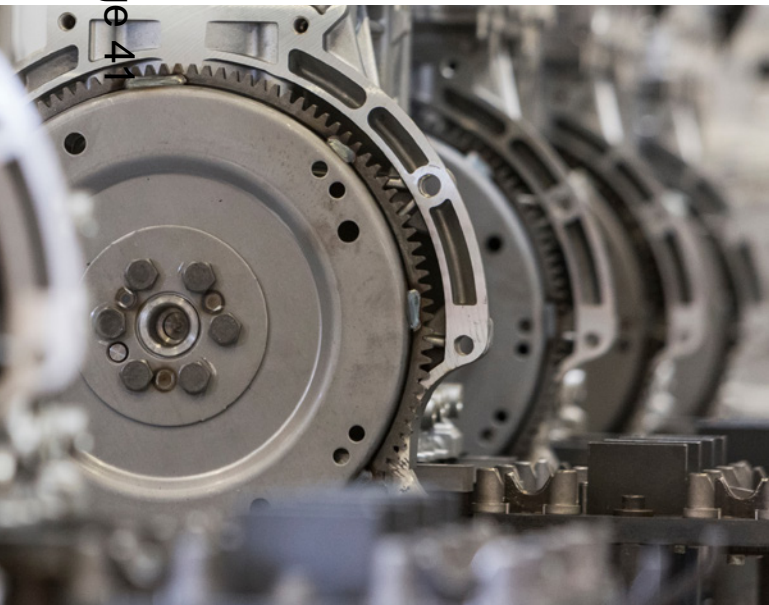
All proposed schemes will be required to follow the same appraisal process as detailed in the Assurance Framework. Schemes will be assessed on their potential to contribute to our high-level aims and strategic objectives; demonstrate value for money, use of the five ways of working and how they contribute to the well-being goals. To be detailed in our Candidate Scheme Assessment Guidance.

We will regularly review our overall delivery programme and, where necessary, revise the Outcomes and Outputs detailed in the Assessment Guidance to ensure a balanced

programme of interventions which will meet all our strategic objectives.

The full allocation of HMT funding to the region is subject to successful completion of five-year gateway reviews, which will assess our ability to deliver regional economic growth and our strategic objectives. The first five-year gateway review final report is due in December 2020 with performance measured against delivery. Further reviews will be carried out at years 10, 15 and 20 and will be more focussed on outcomes.

**“The City Region will only succeed with all stakeholders working together developing a consensus and shared vision of the way forward.”**



## 04. Spatial Priorities

<sup>4</sup> Growth & Competitiveness Commission Report and Recommendations Page 38.

<sup>5</sup> Growth & Competitiveness Commission Report and Recommendations Page 39 Core Findings and Page 43 Recommendation 8 – Strategic Spatial Development.

<sup>6</sup> Having seen the work we are undertaking and assessed the benefits the Welsh Government have commissioned the Carnegie UK Trust to undertake a similar exercise for the whole of Wales.

The Growth & Competitiveness Commission (Commission) considered spatial development in the region and concluded<sup>4</sup>:

*“the Cardiff Capital Region is not homogeneous; it consists of diverse places each with distinctive histories, strengths, challenges and opportunities.”*

The Commission recommended<sup>5</sup>:

*“With differences in economic performance and outcomes across the city-region there is a clear need to ensure that the region is organised spatially in a way that maximises the benefits for residents.*

*The Cardiff Capital Region should develop a spatial perspective to complement its economic strategy... This spatial development perspective should act as a future growth map for the Capital Region and define the key roles and potential of:*

- *Cardiff and Newport as established hubs of business, commerce and institutions, each playing to their particular strengths;*
- *Cardiff Airport and the associated Enterprise Zones;*
- *The re-emerging towns such as Bridgend, Barry, Caerphilly and Pontypridd that are in transition to accommodating high value-added activity, renewed resident populations and university expansions; and*

— *The Valleys and rural towns which are becoming increasingly important centres for local services, amenities and the foundational economy, and are developing their roles in tourism and leisure.”*

We are working with the Local Government Data Unit (Wales) on a data platform to understand the role of our two cities and the individual towns within the region. This work will enable us to make more informed decisions on how we can tailor support for specific settlements and areas to allow them to better understand and achieve their potential and maximise the prosperity and well-being of the people who live in them<sup>6</sup>.

Preliminary findings from this work have highlighted that in addition to the two cities, a number of towns, referred to as re-emerging by the Commission, are playing a significant role in the region’s economy. These findings have been combined with the work on Strategic Hubs undertaken by the Valleys Task Force, inclusion of the regions Enterprise Zones, and the regeneration assessments undertaken by individual local authorities, in considering the Welsh Government’s Targeted Regeneration Investment Fund.

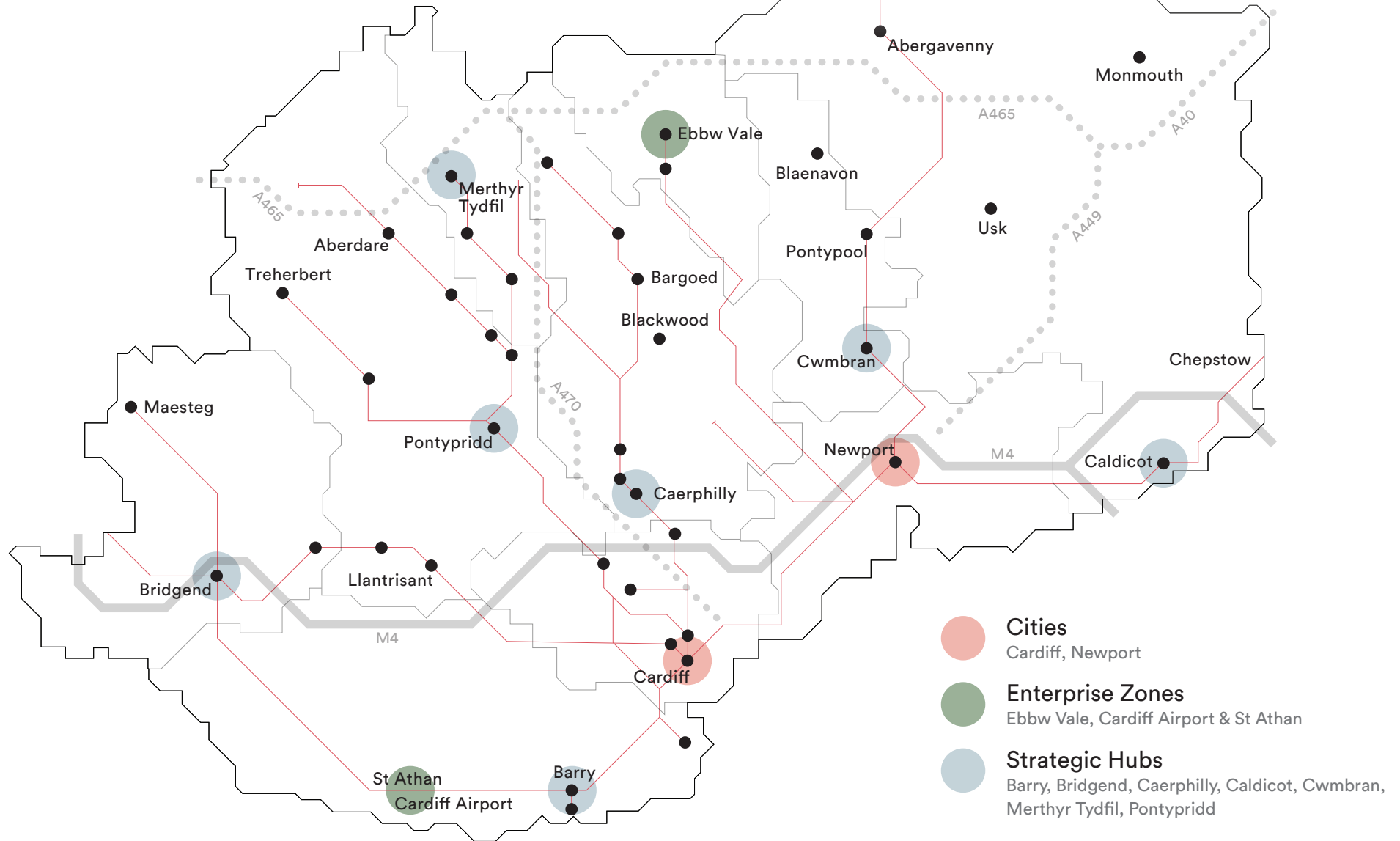
This initial spatial perspective, which will be reviewed and refined as part of the development of the Regional Growth Strategy, is detailed on the plan to the right.

# Strategic Hubs and Opportunity Areas

Page 43

35 Miles Deep

55 Miles Wide



- **Cities**  
Cardiff, Newport
- **Enterprise Zones**  
Ebbw Vale, Cardiff Airport & St Athan
- **Strategic Hubs**  
Barry, Bridgend, Caerphilly, Caldicot, Cwmbran, Merthyr Tydfil, Pontypridd

## 05. Developing a Skilled Workforce and Tackling Unemployment

The Regional Cabinet are working in partnership with the Cardiff Capital Region Skills and Employment Board to develop the social and economic potential of the Cardiff Capital Region, supporting people and businesses to deliver a high performing and prosperous region that stimulates and supports inward investment.

To achieve this the Cardiff Capital Region needs to develop a demand-led skills system that is driven by the needs of industry and which delivers employment and skills support in response to infrastructure and other investments to achieve growth within the regional economy.

### Regional Priorities for Employment & Skills

We are developing a regional, evidence based approach, which will focus on:

- Delivering employment and skills support for industry, infrastructure and other investments to enable growth
- Supporting industry through priority sectors to address skills gaps and shortages
- Developing higher level skills to future-proof the workforce
- Increasing the number and range of apprenticeships
- Improving industry engagement with education and marketing of career opportunities and pathways
- Developing a regional employability plan to get more people into work
- The co-design of the DWP Work and Health programme

**“...supporting people and businesses to deliver a high performing and prosperous region that stimulates and supports inward investment.”**





Top: The Royal Mint, Pontyclun

Bottom: DS Smith, Caerphilly

A programme of interventions is emerging, titled 'Skills for the Future', in response to evidence of regional demand plus examples of successful practice and currently includes:

- **Regional skills brokerage service** – a local authority led and therefore impartial service that works with businesses, projects and investments, in conjunction with economic development and business support services, to secure appropriate and relevant skills solutions through education, training and other providers. Connecting both employees and businesses to regional skills projects and programmes that invest in the upskilling of the existing workforce to support progression and improvements in productivity.
- **Schools engagement** – activities to encourage career choices that align with future demand whilst promoting parity of esteem between different pathways to help young people attain quality and sustained employment.
- **Access to apprenticeships including shared apprenticeships** – employer engagement to increase the number and range of apprenticeships available in the region and schools engagement to increase the number of young people choosing apprenticeship pathways. Delivered in conjunction with work based learning providers and extending access through shared apprenticeship

programmes, such as Y Prentis and Aspire, where appropriate.

- **Graduate internship programme** – employer engagement to increase the number of graduate opportunities available including placements and internships, delivered in conjunction with our Universities. To encourage greater graduate retention within the region and improve the skills utilisation of graduates by businesses to support improvements in innovation and productivity.
- **Regional SME support** – to encourage apprenticeship and graduate take up by SMEs there will be a financial incentive and provision of a human resource support service. In the immediate term the service will support SMEs to maximise use of the current Welsh Government apprenticeships subsidy.
- **Skills Investment Fund** – a co-investment fund for SMEs that supports the upskilling of existing employees to meet technical, specialist and higher level skills needs, that can be accessed in the absence of other sources of funding. A fund of last resort to support co-investment in business led development linked to the achievement of growth, productivity and performance improvements.

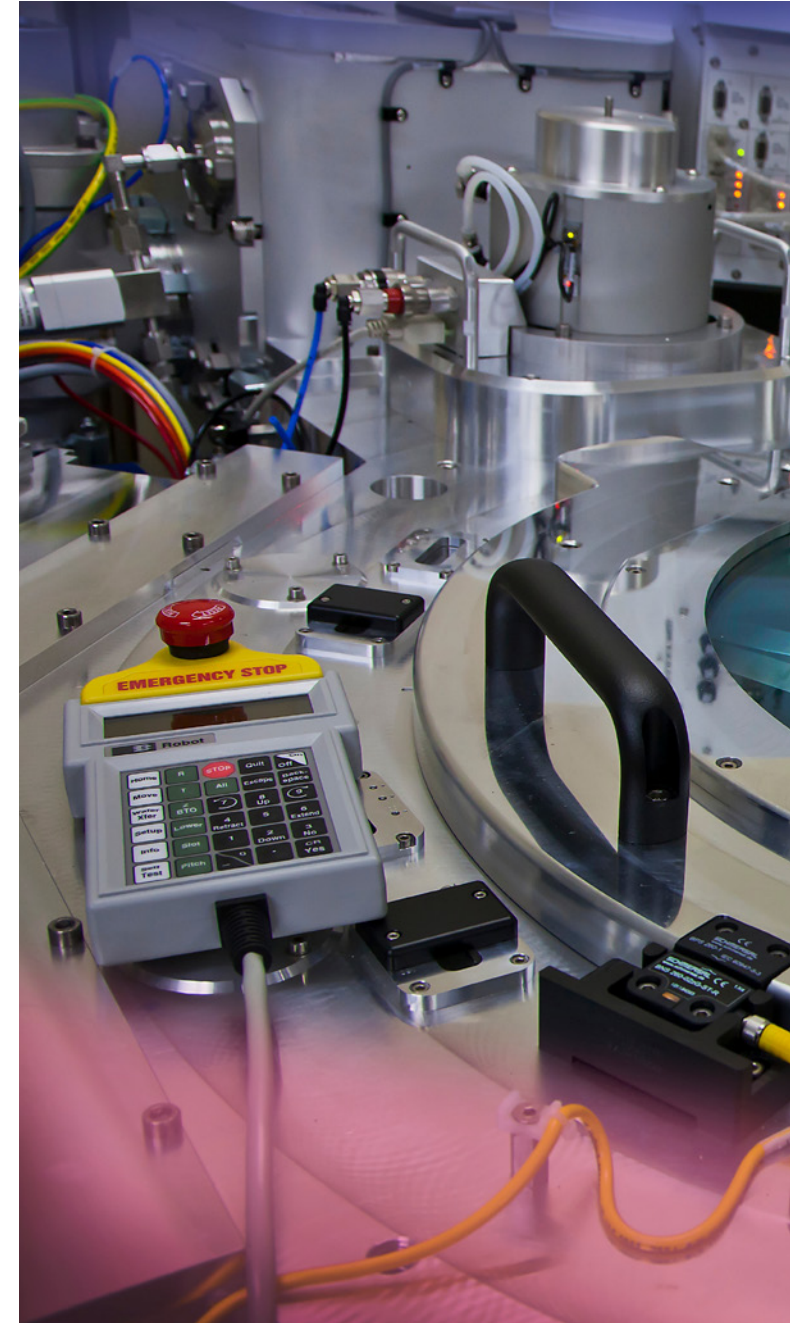
Implementation is proposed in phases commencing early stages beginning in **September 2018**.

## 06. Creating an Innovation District and Increasing Entrepreneurial Activity and Innovation

Innovation is a dynamic driver of economic growth. It underpins the development and application of ideas and technologies that yield better or new goods and services for the marketplace. Innovation is directly linked to raising productivity. Relative to other regional and international economies, productivity is unacceptably low in the Cardiff Capital Region.

Unless this changes, our ambitions for our place will not be realised. Indigenous businesses will not grow as quickly as we would like, wages will not grow as quickly as in other places, external investors will not be attracted here. We will continue to oversee an underperforming region and our brightest people will have better opportunities elsewhere.

We are going to change this. We are going to create an environment that fosters entrepreneurial spirit and the creation of new commercial knowledge by bringing entrepreneurs, government, universities, colleges, funders and corporate entities together and adding in new capability. The Joint Cabinet has produced an Innovation Prospectus setting out in headline terms our direction of travel. The Prospectus is open to change and is reliant on every other City Region priority set out in this business plan delivering.



SPTS Technologies, Newport



## The Innovation Prospectus includes:

- **Innovation District** – We want the region to be internationally recognised as an Innovation District. We will work with Wales Government and UK Government to develop a competitive fiscal environment to promote sectors set out in our City Deal Agreement; specifically compound semi-conductors, life-sciences, cyber, digital, clean energy, infrastructure and engineering.
- **‘Tech Venture Fund’** – The Cardiff Capital Region, in keeping with the rest of Wales, is not strong in terms of an angel investor / venture capitalist culture. We are focussed on establishing a ‘tech venture fund’ working with commercial investors to Improve access to capital. The Fund will make commercial investments, it will not make grant payments. The Fund will be professionally managed and focussed on sectors indicated above. The Fund will operate across the whole region and will only invest in companies in the region.
- **Public Service Testbed** – The region has a significant reliance on public service employment. We will exploit the opportunity that this presents by developing our place as a ‘public service test-bed’. We aim to re-design our public services to optimise their impact on economic prosperity. This will include, but not be limited to, how public sector organisations procure goods and

services and capitalise on the significant Intellectual property that the sector possesses.

- **Regional Business Support** – Business support services across the region are complex. We intend to integrate and align these and simplify and develop easily accessible whole region support and advice.
- **National Software Academy** – We intend to support and accelerate a National Software Academy and National Cyber Academy to develop digital capacity and capability that is currently lacking in the region.

## 07. Improving Connectivity Globally, Regionally and Locally

Our ability to connect and communicate in a fast and reliable way is critical in enabling businesses to generate prosperity and employment, empowering people to take a full part in society and benefit from life's opportunities.

Good quality, highly available, cost effective and efficient networks are a fundamental requirement to enable people to participate fully in modern life and to maximise their opportunities in the employment market.

To enable effective connectivity of all types for our future generations, we must therefore focus on the performance of both our digital and transport infrastructure. We must aim to ensure that our residents, households and businesses, have access to those facilities that they need and want as they go about their lives where they live, work and travel.

---

### Transport

---

The Regional Cabinet, via the newly established Regional Transport Authority, are focussed on understanding the transportation infrastructure issues that restrict economic growth in the Region, identify the opportunities where transportation can open up economic development opportunities and, as equal partners, set joint priorities with Welsh Government for the Region, using our shared resources to deliver the changes.

Over the next 5 years, along with providing advice on transport matters and proposals to the Regional Cabinet, the Regional Transport Authority will focus on:

- **Developing a Regional Transport Strategy for Growth, aligned with Local Transport Plans, aimed at supporting the region's economy.** This Strategy will build on the Economic Growth Strategy and set out the transportation vision and strategic objectives for the region, covering 5 types of travel:
  - **A globally connected city region**
    - developing the potential of our air; rail; road and sea: with a focus on Cardiff Airport, the Great Western Main Line, the M4, the Heads of the Valleys A465, our 3 sea ports at Cardiff, Newport and Barry.

- **City-to City links** – improving access to our major interchanges on the M4 and the Cardiff to London main rail line.
  - **Travel across the wider City Region** – a programme of strategic transport hubs will enable trips to key destinations like town centres, employment areas, hospitals and colleges can be made more easily, and by a choice of mode
  - **Getting into and around the Regional Centre** – supporting sustainable access to Cardiff City Centre.
  - **Connecting neighbourhoods** – more accessible “public realm” including bus stops; better pedestrian and cycle links to public transport stations and stops and road safety measures.
- identifying opportunities and supporting project sponsors to develop transport proposals which, working with other initiatives such as strategic sites, support our strategic objectives.

One significant opportunity has already been identified and defined as Metro Plus.

## »»» Metro Plus

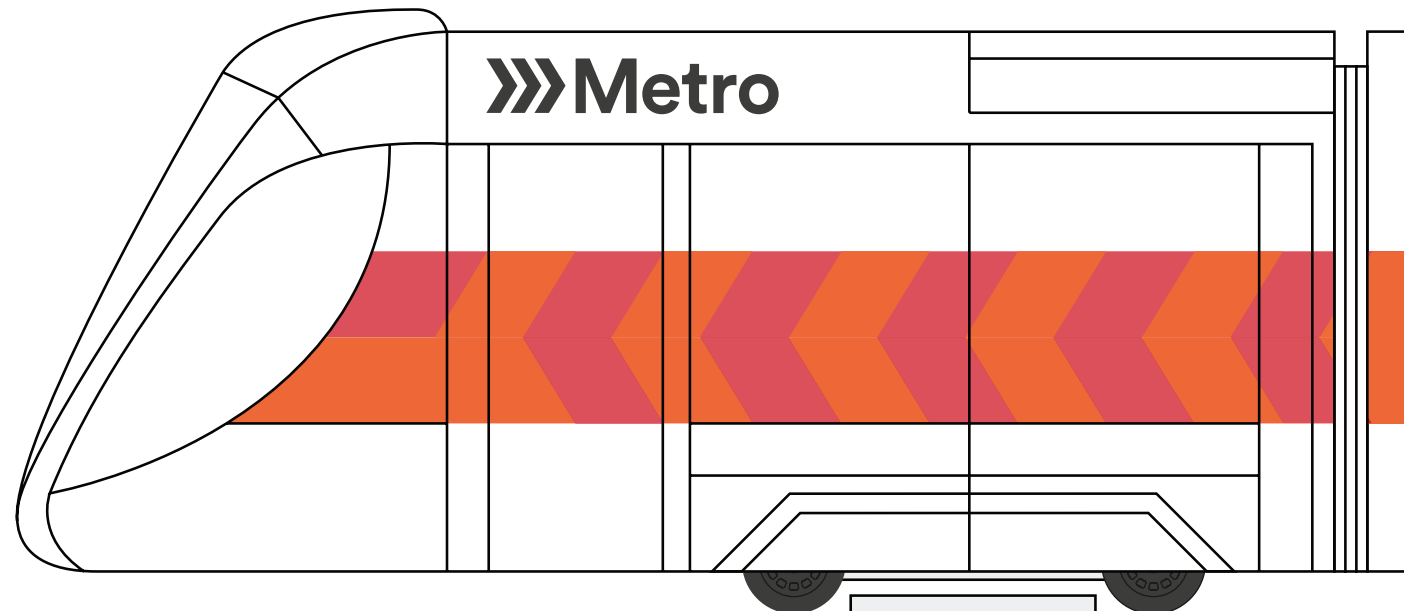
As part of the City Deal there is a pre-allocated sum of £734m committed to the Metro.

The South East Wales Metro is a key priority of the City Deal and will make a significant contribution to improving transport connectivity; unlocking development sites, employment and housing; providing access to training and employment opportunities; access to leisure and tourism and wider cultural development; substantial contribution to carbon reduction targets; and improving quality of life for all residents.

To maximise the potential benefits of the Metro to the region the Regional Cabinet are exploring a programme of complementary transport investment ‘Metro Plus’.

A significant project highlighted as part of this transport programme is the delivery of a Central Transport Interchange, ‘Metro Central’.

This scheme has the potential to significantly increase public transport capacity and attractiveness, and regional connectivity, by allowing increased frequency of services and providing improved facilities.



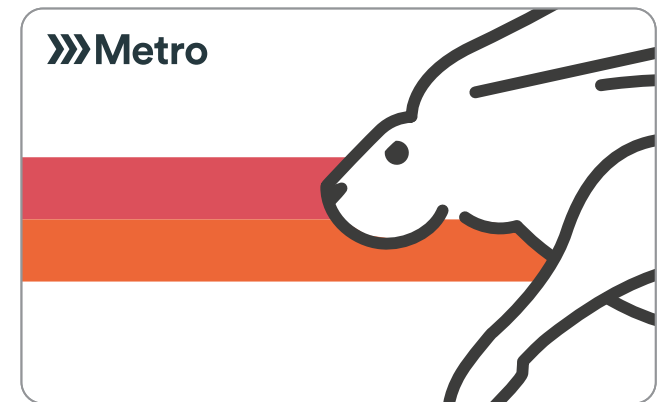
In addition the proposal has the potential to leverage significant commercial development and create more than 30,000 jobs over the next 10-15 years.

A key element of ‘Metro Central’ is the modernisation of Cardiff Central Train Station increasing capacity for trains and passengers, making it fit for purpose, and releasing the potential of the Metro. A feasibility study on the modernisation of Cardiff Central Station has been undertaken identifying a series of interventions including platform access, platform improvements, concourse improvements, platform extension, improved links and weather protection.

Based on the current feasibility work the total cost of the project is estimated at £160-£180m. The funding proposal would see contributions from the Welsh Government, private sector and City Deal, with any shortfall made up from the Department for Transport. This current proposal would see a call on City Deal funding of £40m subject to final approval of the Full Business Case and commitment to match funding from partners.

**Other emerging opportunities being explored are:**

- improved access to Cardiff Airport for both passengers and freight. Linked to the promotion of the enterprise zone and opening-up development land opportunities;
- a programme of strategic park and rides to improve access to the rail network and to transfer car users off the most congested highway routes; and
- improve connections to enable people to access motorways and key national rail interchanges.



Potential Metro smartcard

---

## Digital

---

The Regional Cabinet aspiration is to make the Cardiff Capital Region a “Smart Region”, allowing our future generations to be fully integrated into a global network.

This digital strand is about enabling the future of work to be carried out in all areas of the region by increasing the benefits that digital services bring.

A Tech Nation Report (Tech City 2015), identified this region as home to the fifth fastest growing ‘tech hub’ in the UK and further NESTA research on the growth of technology clusters in the UK demonstrates high start-up rates in and around the capital city region. Coupled with emerging specialisms in data science, open data and cyber security, there is unique potential to connect the entire supply chain of digital services.

Over the next 5 years the Regional Cabinet intend to develop a Digital Portfolio of proposals to support our strategic goals and our aspiration to be a smart region:

- **Organising Delivery** – Creation of a digital vision, brand and identity for CCRCD
- **Global Connectivity** – Implementation of a transatlantic link to enable the fastest possible connection to the global digital network.
- **Welsh Connectivity** – Exploitation of the existing Cardiff Internet Exchange (IX).
- **Regional Fibre Connectivity** – Creation of a strategic site dark fibre network as a public asset. This would support the volume of public, private, research and citizen based traffic into and around CCRCD.
- **Community Fibre Connectivity**
  - A high speed fibre network to connect local communities.

- **Regional/Community WiFi**
  - A ubiquitous public WiFi network as a public utility to be maintained by the private sector on an ongoing basis.
- **Mobile 5G Access** – Implementation of a 5G network.
- **Sensing the CCRCD** – A sensor network across the region through a canopy of connectivity from access points mounted on e.g. street lights.
- **Open Data** – Creation of a fully Open Data environment making all of the vast amount of publicly held data (with the exception of certain data, for example sensitive personal data) available to all, without copyright, patents or other methods of control.

**“A Tech Nation Report (Tech City 2015), identified this region as home to the fifth fastest growing ‘tech hub’ in the UK.”**

## 08. Providing the right physical place and environment to support growth

The Regional Cabinet have recognised the unique opportunity for the ten local authority areas to come together and deliver a strategic approach to housing, regeneration and economic growth to create an accessible, liveable, ‘work-life integrated’ and highly connected region.

Promoting and enabling Place-Making and Sustainable Communities will improve quality of life for residents and attract and retain investors, skilled workers and visitors. By harnessing the distinct characteristics and strengths within the region we will contribute to growth by:

- Upgrading and rebalancing our housing offer;
- Identifying and maximising new spaces and places of potential economic opportunity;
- Capitalising on existing spaces of economic opportunity;
- Regenerating our urban and rural built environments and promoting well-being;
- Improving our visitor economy;
- Developing and managing sustainable energy;
- Using the development of the Metro to promote sustainable regeneration of Town centres and support growth around metro hubs and public transport; and
- Having a clear focus on economic growth and investment as a means to counter disadvantage and deprivation, both for individuals and communities, at local and regional level.

Over the next 5 years the Regional Cabinet intend to develop a number of key areas under this Strategic Theme:

---

### Housing

---

The housing shortfall of the region, linked to the future economic aspirations of the Regional Cabinet, is being full explored and detailed as an expression of ‘need’.

The mechanisms and interventions which could potentially be used across the region to deliver housing are being considered. These options will not necessarily be site specific and there are many projects right across the City Region area that, for different reasons, have stalled but would have a positive impact in terms of City Deal outcomes by increasing GVA. In addition, they would help deliver sustainable communities, increase housing supply, choice, affordability and quality.

Work has been undertaken to identify what mechanisms or interventions can be deployed to increase housing delivery and to support the Housing Objectives detailed in the City Deal Heads of Terms, and by the Growth and Competitiveness Commission. This has resulted in a proposal for:





View from Abergavenny Town Centre

## Regional Housing Fund

Work is being undertaken to develop a proposal for establishing a Housing Investment Fund (HIF) to support the housing growth aspiration across the region and across all tenures. Key benefits of a Fund in the Cardiff Capital Region context would include:

- **Fast-track delivery:** Provides a broad set of financial interventions that can be used to unlock developments that have been previously stalled by a wide range of issues;
- **External funding:** Can complement – and should actively encourage through leverage requirements - the use of external sources of funding, both private and public;
- **Flexibility:** Investment strategy could be crafted to allow for different products to be flexibly used in different locations and different extents over time, depending on the challenges faced in each sub-market, and following review
- **Ongoing benefit:** the opportunity to recycle funds through repayable grants, loans etc. offers scope for funds to be used multiple times.

To complement the proposed Housing Fund, work is being undertaken to develop a Custom Build or Plot Shop for the region whose benefits could include:

- **Stimulation of the SME building sector:** Provides a broad range of sites with limited risks which will be attractive to this sector;
- **Investment:** The Plot Shop encourages investment within communities across the region, whilst the economic multipliers are likely to be less than those associated with volume housebuilding, the impact of multiple sites across the region, within a currently dormant market should be recognised;
- **Flexibility:** SME builders could be supported flexibly in different locations and to different extents over time, depending on the challenges faced in each sub-market.
- **Regeneration benefits:** Many sites represent detractors in our communities, but being packaged within a Plot Shop brings them forward for development, bringing new homes and choices to our communities. Having a range of housing choice can stimulate latent housing markets, with long term benefits to communities.
- **Potential for innovation:** As the scheme develops momentum, there is significant scope to develop innovative homes in terms of energy, construction, design and tenure.

---

## Strategic Sites and infrastructure

---

Research commissioned by the Regional Cabinet and the Welsh Government has illustrated the shortage of good quality sites and premises within the region. With the slowdown of the sort of development undertaken by the WDA during the 1970s – 90s, and the failure of private sector developers to fill that gap in many parts of the region, we now have a very limited 'offer' to put before inward investment or expansion projects and this is a serious constraint on the potential for the region to grow the economy, especially to achieve the sort of 'step change' in the scale of growth envisaged by the Regional Cabinet.

Good quality sites are in short supply and there is now a very limited availability of all sizes and types of speculative, ready to occupy premises ranging from space for small businesses and start-ups right through to large scale manufacturing projects.

Potential sites will be assessed to provide a target list of strategic sites deemed suitable for support and be of the scale and type likely to meet the aims and objectives of the Regional Cabinet.

This assessment of need has resulted in a proposed Strategic Sites Programme:

### Strategic Sites Programme

- **Provision of Employment Sites:** A programme to introduce a balanced portfolio of sites with varied characteristics to be a catalyst to attracting new business investment will be developed. These sites should be capable of supporting both indigenous business growth and inward investment. This should aim to create a significant supply of new floorspace across a wide range of property types across the whole region. This programme will aim to support the current prime market areas of Cardiff and the M4 corridor and have a strategic focus on a future expansion of this prime market to include a mix of opportunities in the Heads of the Valleys corridor, the coastal belt, towns and rural areas.
- **Refurbishment of Existing Stock:** There is an issue of increasing obsolescence in existing building stock which can be a catalyst for business disruption and closure. A programme of refurbishment to retain those businesses already in the region will be developed. Exploring a partnership approach with Welsh Government to overcome this problem is proposed.

- **Encouraging Clusters:** Work will be undertaken to explore the potential to support specific infrastructure and location criteria to encourage clusters of like-minded industries to emerge and develop, nurturing them as centres of excellence.

Within this theme some specialist areas of provision are also emerging which include:

- **Enabling infrastructure**

Opening-up strategic sites, housing and employment, this includes possible transportation and road linkages, drainage and other high value enabling works to bring forward large sites;

- **Joint developments with the HE / FE sectors**

Could provide space for spin-out of research and technology emanating from the educational establishments in the region and linking to the prioritised sectors;

- **Work / live space**

Where residential and employment is combined' with the potential for such shared use developments to be concentrated alongside key development 'nodes' of the Metro project.



Top: Ebbw Vale Enterprise Zone / Bottom: OpenGenius, Penarth

---

## Energy related projects

---

Several energy related projects are emerging around renewable energy generation schemes, energy management and related manufacturing and management technologies. A regional development and delivery approach to these projects could generate significant regional benefit in terms of the economy and environment. There is potential for the region to seek to become recognised as a leader in the energy field including in the manufacturing process for renewable energy machinery, which is an undoubted global growth sector and one with relatively high R&D and a high value-added contribution. In addition the proposal for a tidal lagoon project within the region will play a factor in future proposals.



Ocean Colour Scene at Caerphilly Castle



---

## Urban Renewal / Regeneration

---

Several projects are emerging which would revitalise existing urban and town centre locations, generating jobs in retail and office sectors; providing residential accommodation and helping to address the inequalities in development experienced in recent decades. It is clear this type of support cannot stand alone and will work if it coordinates its approach with the Welsh Government's Targeted Regeneration Investment programme (TRI) which replaces 'Viable and Vibrant Places'. The Regional Cabinet could in future act for Welsh Government, as the delivery arm of any potential regional funding, streamlining programme and project delivery, and overcoming duplication of resources.

In some parts of the region there is potential to explore the development of new settlements (settlements of the future) which would combine housing, employment, education and leisure elements in a planned, sustainable development of significant scale.

This could include the possible development of an arm's length development company to develop council owned sites for both economic and residential purposes.

---

## Visitor Economy

---

Wales, and the Cardiff Capital Region, has a growing worldwide recognition and reputation as a tourist destination and includes iconic visitor attractions such as the Capital city of Cardiff, Cardiff and Caerphilly Castle, Barry Island, Porthcawl and Big Pit to name only a few. Several projects are emerging which could add to the regions 'offer' and attract significant numbers of additional UK and international visitors. These can be complemented by investments in accommodation and the hospitality sector.

The region is also blessed with the Brecon Beacons National Park to the north and the Glamorgan Heritage Coast to the south.

The development of the 'South East Wales Destination Investment Plan' is a key part of the process of developing the tourism offer for the region. This Plan has been commissioned by all the regions councils and will be fundamental in developing the regions tourism. Developing priority themes to support a year-round offer are:

- Business tourism to attract higher value;
- The Region's culture and heritage attractions;
- A strong outdoor adventure offer;
- The Region's events offer.

## 09. Cardiff Capital Region City Deal (CCRCD) Wider Investment Fund

---

### Introduction – ‘The City Deal’

---

The City Deal outlines the joint commitments made by the ten local authorities of the Cardiff Capital Region, the UK Government and the Welsh Government to unlock £1.2bn of investment to increase the performance of the city-region economy. Over its lifetime of 20 years, partners envisaged that the City Deal would deliver up to 25,000 new jobs and leverage an additional £4bn of private sector investment.

As its core proposition the City Deal provides funding to support investment in projects to stimulate economic growth: £734m is allocated to Metro, with the balance (£495m) being made available as the City Deal ‘Wider Investment Fund’.

---

### Wider Investment Fund (WIF) – Funding Streams

---

**HMT Contribution:** UK Government grant of £375m paid over 20 years period and consists of £50m revenue grant (years 1-5) and £325m capital grant from years 6-20. Expenditure incurred in advance of receiving UK Government grant will require ‘temporary borrowing’ and is referred to as the ‘Cost of Carry’.

**Council Contribution:** CCRCD Local Authority Partnership capital contribution of £120m. This will be drawn down as projects are approved and the Wider Investment Fund’s (WIF’s) overall funding requirements begin to crystallise. Council Contributions represent 24.2% of the WIF’s overall funding stream.

---

### WIF Approvals to-date

---

**Wider Investment Fund ‘Top Slice’:** 3% of the fund is set aside to fund the activities of a number of Regional Bodies and to meet the costs of Programme Development and Support. This equates to an annual revenue budget of £742,500.

**Compound Semi-Conductor Project:** During 2017/18, Regional Cabinet approved the proposal in respect of the Compound Semi-Conductor Project. This involves providing a loan of £38.5m to a Special Purpose Vehicle over 2 years, which will be repaid over a period of up to 11 years. The loan repayments will be ‘recycled’ back through WIF potentially increasing the fund’s gross resources from £495m to £533.5m. This is the only project which has full approval to date.

---

## WIF 'In-Principle' Commitments and Fund Availability

---

**In-Principle Commitments:** Regional Cabinet have provided an 'in-principle' commitment to the following projects and initiatives: Metro Central Project, Regional Housing Investment Fund, Digital Strategy and Skills for the Future. In-line with the requirements of the Assurance Framework, these projects are in the process of developing their respective business cases.

**Future Revenue Projects:** This represents the un-committed resources available to meet the cost of future REVENUE projects (day to day expenditure) as these are approved.

**Future Capital Projects:** This represents the un-committed resources available to meet the cost of future CAPITAL projects (expenditure resulting in the creation of an asset) as these are approved.



WIF Indicative Expenditure Profile		Annual £m	Cum'. £m
Year 1	2016/17	0.0	0.0
Year 2	2017/18	25.4	25.4
Year 3	2018/19	19.6	45.0
Year 4	2019/20	30.0	75.0
Year 5	2020/21	30.0	105.0
Gateway Review			
Year 6	2021/22	45.0	150.0
Year 7	2022/23	45.0	195.0
<b>Total Yrs 3-7</b>	<b>18/19 - 22/23</b>	<b>169.6</b>	<b>195.0</b>
<b>Years 8-11</b>	<b>23/24 - 26/27</b>	<b>284.3</b>	<b>479.3</b>
<b>Years 12-20</b>	<b>27/28 - 35/36</b>	<b>15.7</b>	<b>495.0</b>

JWA 5 Year Business Plan

### WIF Indicative Programme and Updated Affordability Envelope

This is the first JWA Business Plan to be prepared and reflects that a number of projects are in the process of being developed. The Assurance Framework requires detailed business cases to be prepared before projects gain full approval.

An indicative programme of investment has been modelled based on actual approvals to date, supplemented by the typical spend profile of City Deals along with a range of other financial and technical assumptions, such as interest rates etc. The indicative modelling suggests that the ‘wholelife cost’ of the Wider Investment Fund to the CCRC Local Authorities could be in the region of £210.8m.



The Joint Working Agreement defines this wholelife cost as the partnership's 'Updated Affordability Envelope'.

### Updated Affordability Envelope

Wider Investment Fund	£m
HMT Contribution (Grant)	375.0
Council Contribution (LA Capital)	120.0
Assumed Repayment Term	25 years
Assumed Interest Rate	3.0%
HMT Grant 'Cost of Carry'*	36.4m
LA £120M 'Cost of Capital'**	174.4m
<b>Affordability Envelope</b>	<b>210.8m</b>

\* Cost of Carry refers to the interest costs associated with up-front borrowing of the HMT Contribution (grant) ahead of receipt

\*\* Cost of Capital refers to the Principal and Interest cost associated with borrowing the Council Contribution by the local authorities



Orangebox, Treforest

### Council Contributions

The Joint Working Agreement outlines that Council Contributions will be based on 'population' fixed at point in time. The agreed model is based on the 2015 ONS population data and will be used as the baseline for sharing costs moving forward. This baseline position will be applicable throughout the 'wholelife' of the Wider Investment Fund.

### Agreed Council Contributions % Rates

Local Authority Partner	%
Blaenau Gwent	4.6
Bridgend	9.4
Caerphilly	12.0
Cardiff	23.7
Merthyr Tydfil	3.9
Monmouthshire	6.1
Newport	9.8
Rhondda Cynon Taff	15.8
Torfaen	6.1
Vale of Glamorgan	8.5
<b>Total</b>	<b>100%</b>

## 1. Cardiff Capital Region City Deal Wider Investment Fund – Indicative Investment Programme for the Strategic Themes

Indicative Programme Expenditure	Yr 3 2018/19 £m	Yr 4 2019/20 £m
Wider Investment Fund Top Slice	0.74	0.74
Approved Projects	13.84	0.00
Future Revenue Projects	1.00	1.00
Future Capital Projects	4.02	28.26
<b>Total Investment</b>	<b>19.60</b>	<b>30.00</b>
Funded by		
HMT Contribution (Revenue)	-1.89	-3.90
HMT Contribution (Capital)	0.00	0.00
<b>Total HMT Contribution</b>	<b>-1.89</b>	<b>-3.90</b>
Council Contribution	-17.71	-5.06
Temp Borrowing 'Cost of Carry'	0.00	-21.04
<b>Total Funding</b>	<b>-19.60</b>	<b>-30.00</b>

	Yr 5 2020/21 £m		Yr 6 2021/22 £m	Yr 7 2022/23 £m	Total Yrs 3-7 £m	Total Yrs 1-20 £m
	0.74		0.74	0.74	<b>3.71</b>	<b>14.11</b>
	0.00		0.00	0.00	<b>13.84</b>	<b>38.50</b>
	1.00		1.00	1.00	<b>5.00</b>	<b>18.00</b>
	28.26		43.26	43.26	<b>147.05</b>	<b>424.39</b>
	<b>30.00</b>		<b>45.00</b>	<b>45.00</b>	<b>169.60</b>	<b>495.00</b>
	-3.90		-3.90	-3.90	<b>-17.51</b>	<b>-50.00</b>
	0.00		-22.00	-22.00	<b>-44.00</b>	<b>-325.00</b>
	<b>-3.90</b>		<b>-25.90</b>	<b>-25.90</b>	<b>-61.51</b>	<b>-375.00</b>
	-5.06		-7.96	-7.96	<b>-43.74</b>	<b>-120.00</b>
	-21.04		-11.13	-11.13	<b>-64.35</b>	<b>-0.00</b>
	<b>-30.00</b>		<b>-45.00</b>	<b>-45.00</b>	<b>-169.60</b>	<b>-495.00</b>

## 2. Annual Spend Profile and Wholelife Revenue Implications for each Council

	Yr 3 2018/19 £m	Yr 4 2019/20 £m
Blaenau Gwent (4.6%)	0.04	0.07
Bridgend (9.4%)	0.09	0.14
Caerphilly (12.0%)	0.11	0.17
Cardiff (23.7%)	0.22	0.34
Merthyr Tydfil (3.9%)	0.04	0.06
Monmouthshire (6.1%)	0.06	0.09
Newport (9.8%)	0.09	0.14
Rhondda Cynon Taf (15.8%)	0.15	0.23
Torfaen (6.1%)	0.06	0.09
Vale of Glamorgan (8.5%)	0.08	0.12
<b>Total (100%)</b>	<b>0.94</b>	<b>1.44</b>

	Yr 5 2020/21 £m	Yr 6 2021/22 £m	Yr 7 2022/23 £m	Total Yrs 3-7 £m	Total Yrs 1-38 £m
	0.08	0.12	0.16	<b>0.48</b>	<b>9.74</b>
	0.17	0.24	0.34	<b>0.97</b>	<b>19.90</b>
	0.22	0.31	0.43	<b>1.23</b>	<b>25.23</b>
	0.43	0.61	0.85	<b>2.45</b>	<b>50.01</b>
	0.07	0.10	0.14	<b>0.41</b>	<b>8.31</b>
	0.11	0.16	0.22	<b>0.63</b>	<b>12.95</b>
	0.18	0.25	0.35	<b>1.01</b>	<b>20.69</b>
	0.29	0.40	0.56	<b>1.63</b>	<b>33.25</b>
	0.11	0.16	0.22	<b>0.63</b>	<b>12.86</b>
	0.15	0.22	0.30	<b>0.87</b>	<b>17.87</b>
	<b>1.81</b>	<b>2.56</b>	<b>3.57</b>	<b>10.31</b>	<b>210.80</b>

---

### WIF External Audit / Monitoring and Reporting

---

Clause 7.1.4. of the JWA states that “The JWA Business Plan shall, amongst other matters, address the following:

*“the methodology and responsibility for any external audits in relation to this Agreement”.*

This requirement will be addressed through the Annual Audit Plan agreed with the relevant external auditors and presented to Regional Cabinet for consideration and approval.

*“any revenue and capital monitoring reports to be prepared for the Joint Committee and the frequency of such reports.”*

Regional Cabinet will receive regular revenue and capital monitoring reports throughout the year advising on matters such as: Approved Budget, Actual Position To-Date, Commitments and Projected Out-turn. These reports will be supplemented by the appropriate Project Performance Reports, advising on all aspects of the Wider Investment Fund.

---

### HMT Contribution - Funding Terms & Conditions

---

The funding will be paid to the Accountable Body on behalf of the ten CCRCD local authorities. The funding must be used solely to support the objectives of CCRCD through the implementation of projects and schemes agreed by the Regional Cabinet and in accordance with arrangements set out in its Joint Working Agreement, Wider Investment Fund, Assurance Framework, and the JWA Business Plan.

An outcome based Gateway Review of CCRCD led by HM Treasury will be undertaken in 2020/21. Funding for 2021/22 and beyond is conditional on CCRCD successfully passing this Gateway Review.

It has been confirmed that in any year, where funds have been committed and/or there is a clear intention to spend, carry forward of funding to future years will be permitted. Carry forward in respect of the final year (2020-21), will also be permitted providing that the Gateway Review is passed.



Cardiff Airport, Rhoose

## 10. Additional Opportunities for Regional Funding: Including European Funding & Additional Flexibilities

The Regional Cabinet, in addition to the City Deal Wider Investment Fund, have been delegate responsibility by the ten participating local authorities for “additional devolved funding provided to the Capital Region”.

The Regional Cabinet will seek to align the use of European funding in the region to complement and enhance City Deal investments, aims and objectives.

To maximise the benefits of the City Deal and deliver a longer-term regional economic strategy, greater than that which can be achieved by the City Deal resources alone, the Regional Cabinet will explore with the Welsh Government the options for greater financial autonomy and flexibility.

In addition, the Regional Cabinet will be proactive in seeking out other funding opportunities which align and support the regional objectives.

---

### European Funding

---

#### **Maximising opportunities from current European Funding Programmes**

There are opportunities to access funding from a number of different European Funding Programmes during the current programming period (2014-2020), from the traditional sources of the Structural Fund Programmes (ERDF & ESF) and the Rural Development Plan administered by the Welsh Government to large thematic funding programmes directly managed by the European Commission, such as the HORIZON 2020 programme for Research, Development and Innovation and the ERASMUS+ programme for young people.

The UK Government has guaranteed funding for all projects approved before the UK exits the EU (end of March 2019), enabling projects to deliver until 2023.

#### **Influencing future funding arrangements**

The discussions on replacement funding following the UK’s exit from the EU have already started thus it is important that the Region influences these discussions, both with the UK and Welsh Governments. A consultation on a UK Shared Prosperity Fund to replace current EU Structural Funds is expected to be launched by the UK Government later this year.



The timing for the introduction of replacement funding will depend on any agreement reached on transitional arrangements relating to current EU programmes which are due to end in 2020. In the meantime, the Welsh Government has launched a consultation on 'Regional Investment in Wales after Brexit'. This sets out its views on future regional policy in Wales and argues for Wales' share of any new fund to be devolved.

It will also be important to lobby for continued access to key EU thematic funding programmes post Brexit, including the successor programmes to HORIZON 2020, ERASMUS+ and some transnational programmes. These will form part of the negotiations between the UK Government and the European Commission.

**“The Regional Cabinet will seek to align the use of European funding in the region to complement and enhance City Deal investments, aims and objectives.”**



The Senedd, Cardiff Bay

---

### Additional Flexibilities

---

A case will be made for a range of powers to be devolved to the local authorities of the Cardiff Capital Region. This case will also argue for flexibility to enable the region to access a range of funding sources to supplement the City Deal.

The proposed powers and flexibilities may include:

- retention of business rate income;
  - explore proposals for the Cardiff Capital Region to control above forecast growth in business rates to support economic development proposals for the Cardiff Capital Region
- the ability to levy an infrastructure supplement;
  - explore proposals for introducing an additional levy for infrastructure, based on a supplement to business rates
- use of alternative finance sources;
  - **explore other potential sources of funding including the following:**
  - private sector funding / market opportunities
  - tax increment financing
  - local authority bonds
  - housing finance
  - private public partnerships
  - pension funds

- online alternative finance sources.
- the removal of conditions around some specific Welsh Government grants;
  - aggregating specific grants to a regional level and removing the conditions that currently apply

---

### Additional Funding Opportunities

---

The Regional Cabinet is fully aware that the City Deal funding alone is not sufficient to achieve the aims and objectives for the region. The Cabinet will therefore seek to maximise the potential of the City Deal funding by using it as a catalyst to draw in additional resources from the public and private sectors, as well as other possible investors.

Numerous funding opportunities arise, many of which have prohibitive timescales or do not align with the regions strategic priorities.

The Regional Cabinet will use its resources wisely to pursue those opportunities which will enhance its ability to develop the region and, where match funding is required, accord with the assessment processes detailed in the Assurance Framework.



Cardiff, Penarth and Barry, Southern border of the Region



**SUBJECT: MONMOUTHSHIRE LOCAL DEVELOPMENT PLAN AND SOUTH EAST WALES STRATEGIC DEVELOPMENT PLAN**  
**MEETING: COUNCIL**  
**DATE: 19 MARCH 2018**  
**DIVISION/WARDS AFFECTED: ALL**

**1. PURPOSE:**

- 1.1 The purpose of this report is to seek Council's approval to commence work on a new planning policy framework to shape and grow the future of our County and its role in the region, in line with the Council's purpose of building sustainable and resilient communities.
- 1.2 Specifically, Council approval is sought to commence work on a new Local Development Plan (LDP) for Monmouthshire, to endorse the draft Delivery Agreement including Community Involvement Scheme for four week targeted consultation, and to agree to be part of the South East Wales Strategic Development Plan (SDP).

**2. RECOMMENDATIONS:**

- 2.1 That Council endorses the Review Report for submission to the Welsh Government.
- 2.2 That Council approves the commencement of a full revision to its Local Development Plan, which would result in a brand new LDP for Monmouthshire for the period up to 2033.
- 2.3 That Council endorses the draft Delivery Agreement including Community Involvement Scheme for the new LDP for a four week targeted consultation.
- 2.4 That Council formally resolves to be part of the South East Wales Strategic Development Plan.

**3. KEY ISSUES:**

Background

- 3.1 The land use planning system is one of the main tools available to the Council to seek to deliver its purpose, as identified in the Corporate Plan 2018-2022, of helping to build sustainable and resilient communities that support the well-being of current and future generations. The Local Development Plan (LDP) allocates land for types of development (such as housing or employment uses), designates land as open space or green wedge, and provides a policy framework which provides the basis or making decisions on planning applications. It seeks to support good quality development in the right locations, and resist poor quality or inappropriately located development.
- 3.2 The Monmouthshire Local Development Plan (2011-2021) was adopted in February 2014 to become the statutory development plan for the County (excluding that part within the Brecon Beacons National Park, which has its own LDP).
- 3.3 Since the current LDP was adopted, the Planning (Wales) Act 2015 introduced additional tiers of statutory Development Plans:

- A National Development Framework (NDF), covering the whole of Wales and written by the Welsh Government. This will replace the Wales Spatial Plan. The Welsh Government has commenced work on the NDF and it is expected to be published in September 2020;
- Strategic Development Plans (SDP), which are an optional tier of Plan intended to provide an effective cross-boundary planning policy framework for matters of regional significance. This would sit alongside a Regional Economic Development Strategy and Regional Transport Plan;
- If a SDP is in place, local matters, such as the allocation of land for housing or employment, would sit in a 'light touch LDP'. If there is no SDP, a 'full LDP' is required;
- Place Plans can then be provided at a community level. These must reflect the LDP and would be a planning consideration rather than a statutory part of the Development Plan framework.

The above information is of direct relevance to the options appraisal and recommendations contained in this report, for the reasons set out later in this report.

### Monmouthshire's LDP Review

- 3.4 LDP review is the task of evaluating the extent to which an adopted LDP is functioning effectively. The Regulations allow for a 'selective review' to look at part(s) of a LDP, or a 'full review', which looks at the entire LDP. There is a statutory requirement to undertake a full LDP review every four years after adoption (February 2018 for Monmouthshire).
- 3.5 The decision to undertake an early 'full review' of Monmouthshire's LDP was taken for the following reasons:
- The 2016 Annual Monitoring Report (AMR) recommended an early review of the LDP because it identified a need to address the shortfall in the housing land supply and to facilitate the identification and allocation of additional housing land. This was endorsed by Cabinet in October 2016;
  - The 2017 AMR formed the first stage of the review process and it confirmed the need to continue with an early review of the LDP;
  - The statutory requirement for a 'full review' every four years after adoption meant Monmouthshire would have needed to commence a full review in February 2018 in any case;
  - An acknowledgement that the current LDP expires in December 2021, and the need to maintain continuous Plan coverage (see below) requires a timely start on a replacement LDP for the period beyond 2021.
- 3.6 Consequently, a full review of the LDP commenced in 2017, with the publication of the Draft Review Report endorsed by Cabinet in December 2017 for 8 week consultation. This consultation period has now closed, responses have been considered and incorporated into the final Review Report as appropriate.
- 3.7 The final LDP Review Report is attached as **Appendix 1a**. The Review Report provides an overview of the issues that have been considered as part of the full review process and subsequently identifies the changes that are likely to be needed to the LDP, based on evidence. It has been informed by the findings of preceding AMRs, significant contextual changes and updates to the evidence base, and consultation responses. A table summarising the consultation replies is provided at **Appendix 1c**. A summary of the consultation replies down by the question being answered is attached at **Appendix 2**. If desired, the same comments can be viewed grouped by representor via this link [LDP Draft Review Report Consultation Responses - Representor Order.pdf](#) to enable each representor's comments to be read in context.

3.8 A high level summary of consultation responses is provided below (and in more detail as part of the Review Report):

**Question 1: Do you agree that the main issues that should be considered in the full LDP Review have been identified?**

- Agree: 18 respondents
- Disagree: 12 respondents
- Neither Agree nor Disagree: 5 respondents

The main issues cited by those disagreeing relate to the need for additional housing (market and affordable); the need for infrastructure to align with growth; the impact of the Severn Bridge toll removal on house prices, the accessibility of buying a house, and demand for housing/desirability of the County as a place to live; and the over-reliance of the current LDP on strategic housing sites. All of these matters would be considered as part of the new LDP.

**Question 2: Do you agree that the existing LDP vision, issues and objectives remain relevant for a revised Plan?**

- Agree: 15 respondents
- Disagree: 5 respondents
- Neither Agree nor Disagree: 13 respondents

The comments provided by those respondents who 'disagreed' did not generally disagree with the relevance of the existing vision, issues and objectives but rather considered that they would need to be reviewed as part of the new LDP and its strategy. This would be a natural part of the thought and decision-making process that would stem from commencing a new LDP.

**Question 3: Do you agree that the adopted LDP Spatial Strategy is functioning effectively?**

- Agree: 6 respondents
- Disagree: 17 respondents
- Neither Agree or Disagree: 9 respondents

The significant majority of respondents who 'disagreed' refer to the current LDP's over-reliance on strategic sites combined with a lack of flexibility in terms of housing numbers resulting in the lack of a five year housing land supply; the corresponding need for additional smaller sites accessible to other developers; and a lack of housing around main and minor villages. One respondent opposes any additional development sites. One respondent highlighted the failure to adequately assess and meet Gypsy and Traveller needs. Again, these are all matters for consideration as part of a new LDP.

**Question 4: Do you agree with the findings of the LDP policy review?**

- Agree: 13 respondents
- Disagree: 16 respondents disagree
- Neither Agree or Disagree: 8 respondents

The majority of comments made related to the housing provision, spatial strategy and affordable housing policies reiterating those comments reflected above. The second highest topic in terms of number of comments related to employment allocations and their relationship with commuting, growth sectors and City Deal, as well as the importance of tourism in Monmouthshire. Most other comments seek tweaks to policies which would not in themselves justify revising the LDP, but revision provides an opportunity for such changes to be made if required. Two representors object to the suggested deletion of Policy SD3, which officers consider unnecessarily duplicates but does not properly reflect national flooding policy in TAN15,

**Question 5: Do you agree that the LDP needs to be revised? If so, should this be via a short form or full revision?**

- Short Form: 11 respondents support a short form revision of the LDP

- Full Revision: 28 respondents support a full revision of the LDP

### Options available for LDP revision

3.9 LDP revision' is the process of actually amending, changing or replacing the Local Development Plan. The Draft Review Report set out three options:

- 1) Do nothing;
- 2) Undertake a 'short form' revision of the LDP; or
- 3) Undertake a 'full revision' of the LDP.

#### 'Do nothing'

3.9.1 'Do nothing' is easily discounted as a viable or appropriate option for the same reasons as those set out in paragraph 3.5 above and in the Review Report. Even if the LDP were functioning perfectly, work must commence on a new Plan to cover the period after 31<sup>st</sup> December 2021 when the current LDP expires.

#### 'Short form' revision

3.9.2 A 'short form' revision would retain the vision, issues, objectives, and spatial strategy of the current LDP but would make focused changes to address identified issues. This would involve, for example, allocating additional housing sites to address the primary issue with timely site delivery and absence of a five year land supply. The keys steps would be a call for candidate sites, an appraisal and consultation on those proposed sites, examination and adoption. At adoption, regulations require that the amended LDP must have a 10 year lifespan, so this option would not simply be a case of adding a selection of additional sites to get us to 2021: it would be the continuation of the current LDP strategy until approximately 2030. Additional changes would be required, for example to assess and, as necessary, meet any identified Gypsy and Traveller site requirements.

#### 'Full revision'

3.9.3 Full revision results in a brand new LDP. It is recommended by officers that this new LDP should have a lifespan of 15 years starting from a base-date of 2018 when work would commence, and running to 2033. The current LDP would continue to be the statutory adopted LDP until 31<sup>st</sup> December 2021 or until such earlier date if the new LDP is adopted beforehand (although this is highly unlikely).

3.10 It is worth noting that the Welsh Government's Planning Division has advised that it would be minded to object to Monmouthshire adopting a short form revision approach due to its opinion that the changes needed are too far reaching. However, far more important than that is the question of whether or not a continuation of the current LDP strategy provides the outcomes that our communities want, or that address any of the critical challenges identified as part of Future Monmouthshire.

### Conclusion of the LDP Review Report

3.11 Based on the evidence contained in the Review Report, it is concluded that the LDP should be revised and that this should take the form of a full revision procedure. Key reasons for reaching this conclusion include:

- The inability to meet the adopted LDP's housing requirement and the resulting failure to maintain a 5 year housing land supply indicates that either additional housing sites are required or the level of housing growth required by the Plan's strategy will need to be reconsidered;
- The need to reassess all undelivered housing allocations to determine whether they remain viable and deliverable which could result in existing allocations being removed from the LDP and new sites added. The LDP's reliance on strategic sites



suggests that the spatial distribution of housing growth will need to be reconsidered;

- The extent of updates required to the evidence base for an extended Plan period, including updated needs and land requirements, could result in significant changes to the Plan;
- Wider contextual matters that have occurred since the Plan's adoption, including the Cardiff Capital Region City Deal and announcement to abolish the Severn Bridge Tolls need to be fully considered.

3.12 The potential cumulative changes required to the LDP as a consequence of these factors could result in a Plan that is distinctly different to the one adopted. Accordingly, it is considered that the full revision procedure would be the most appropriate means of revising the LDP. Importantly, the full revision procedure would enable a comprehensive reconsideration of the Plan's strategy, having regard to an extended Plan period and the wider context including the Cardiff Capital Region City Deal and Future Monmouthshire aspirations, together with the economic opportunities associated with the abolition of the Severn Bridge Tolls.

3.13 Having concluded that a new LDP is required, consideration must be given to the best footprint for the land use planning framework.

#### The regional context

3.14 Cabinet approved the Draft Review Report for consultation on 6<sup>th</sup> December 2017. On 13<sup>th</sup> December, the Council received two letters from Lesley Griffiths, Welsh Government Cabinet Secretary whose portfolio includes planning. The first letter went to the Leader and Chief Executive of every Local Planning Authority in Wales and invited Councils to undertake a Strategic Development Plan (SDP) in their region. The second letter specifically invited Monmouthshire to undertake a Joint Local Development Plan with Newport, Torfaen and Blaenau Gwent Councils. These letters are attached at **Appendix 3**. Some, but not all, other Local Planning Authorities received a similar letter.

#### Strategic Development Plan

3.15 A SDP would provide a regional spatial framework for the future development and use of land in the Cardiff Capital Region. It would provide an appropriate and effective footprint to deliver strategic, cross-boundary land use planning at the regional scale, supporting the region's economic, transport/connectivity and other aspirations. It would help guide and provide certainty for strategic public and private investment decisions including those made under the City Deal initiative and beyond.

3.16 The concept is fully supported by officers from the ten CCR Authorities and formed part of the Growth Commission's report, which has previously been approved in principle by Council. The ten Council Leaders from the Cardiff Capital Region sent a joint response to Lesley Griffiths dated 6<sup>th</sup> February 2018, which states:

*"there was consensus amongst all 10 Leaders in the Cardiff Capital Region in support of the principle of an SDP for the region. Whilst the decision to work towards an SDP is a matter for each of the 10 Councils, we are confident that this is a decision which can be taken quickly."*

A copy of this reply is attached at **Appendix 4**. As set out in recommendation 2.4 above, a Council resolution is now sought to formally agree to be part of the SE Wales SDP.

3.17 In requesting this resolution, it is fully recognised that there are a number of important detailed matters to be resolved, which themselves will require political endorsement.

These include the boundary of the SDP area, resources (both officer and financial), and governance. It is envisaged that work towards a SDP would commence in 2018, with the goal of adopting the SDP in 2022/2023. A SDP should have a longer term span, likely to be at least 20 years. Governance arrangements for a SDP are guided by regulations: governance would be via a Strategic Planning Panel (SPP) two-thirds of whom would comprise elected Members with voting rights (at least one from each constituent Council) and the remaining one-third would comprise advisors (without voting rights) from economic, environmental or social areas of expertise. The regulations seek a gender mix of no greater imbalance than 60/40.

- 3.18 It is worth noting that the Welsh Government has powers to mandate the creation of a SDP. Notwithstanding that mandating joint working is not the way to secure meaningful, effective and sustainable collaboration, officers and Leaders for all ten Councils in the CCR fully support this proposal and are each now seeking approval from their respective Councils.

#### Joint Local Development Plans

- 3.19 In contrast, the Cabinet Secretary's invitation to prepare a Joint LDP with Newport, Torfaen and Blaenau Gwent Councils is not supported for a number of reasons. The key reasons are summarised below and relate to outcomes, governance and procedural matters, but a full options appraisal has been undertaken and is attached at **Appendix 5**.

- 3.20 To provide some context, the Cabinet Secretary has proposed the following LDP footprints:

- Monmouthshire, Newport, Torfaen and Blaenau Gwent: with the exception of Newport whose LDP runs to 2026, our current LDPs expire in 2021. Newport is required to undertake its statutory four year post-adoption review in January 2019;
- Caerphilly, Rhondda Cynon Taff and Bridgend: LDPs all expire in 2021;
- Carmarthenshire, Pembrokeshire and Ceredigion: LDPs expire in 2021 or 2022;
- Conwy and Denbighshire: LDPs expire in 2022 and 2021 respectively; Denbighshire has sought to commence its own revised LDP but has been put on hold by the Welsh Government pending responses to this request;

The following Councils did not receive a letter:

- Gwynedd and Anglesey: these Councils have already prepared a Joint LDP;
- Merthyr Tydfil and Wrexham: these Councils have commenced work on their replacement LDPs;
- Swansea, Powys, Flintshire and Wrexham: these Councils are at an advanced stage working towards their first LDP;
- Cardiff and Vale of Glamorgan: these Councils have recently adopted LDPs that run until 2026;
- Brecon Beacons, Pembrokeshire Coast and Snowdonia National Parks: the regulations do not allow the Welsh Government to mandate Joint LDPs for National Park Authorities.

- 3.21 The Cabinet Secretary's letter provides the following reasons as evidence supporting Joint LDPs: quicker and cheaper Plan preparation; effective cross-boundary planning to reflect housing markets and economic footprints; lack of capacity, capability and resilience in planning teams due to significant cuts to planning service budgets; links to Local Government reform.

- 3.22 Officers have met with colleagues at a national, CCR and 'South East Wales – East' basis to explore the proposals in detail. There appears to be no support throughout Wales for the proposed footprints. However, what is important for Council's decision

is whether or not a Joint LDP is an appropriate way to deliver the outcomes our communities seek, and to deliver the Council's purpose as identified in the Corporate Plan 2018-2022, of helping to build sustainable and resilient communities that support the well-being of current and future generations.

- 3.23 The proposed 'South East Wales – East' Joint LDP would result in a Plan covering some 400,000 people across an area exceeding 100,000 hectares. The proposed footprint comprises a very diverse area with vastly different demography, economies and physical characteristics ranging from Wales' third largest City, to historic market towns and significant rurality, to disadvantaged valleys communities. Population density<sup>1</sup> ranges from 7.85 people per square kilometre in Newport to 1.05 in Monmouthshire. The proportion of land area defined as 'built on' ranges from 25% in Newport to 3% in Monmouthshire<sup>2</sup>. Blaenau Gwent has the highest proportion (23.4%) of LSOAs ranked in the lowest 10% in Wales while Monmouthshire has the lowest proportion (0%)<sup>3</sup>. The proposed grouping does not withstand evidence-based scrutiny.
- 3.24 As Members will be aware, Monmouthshire has some very distinct challenges, including the fastest growing proportion of its population in the over 65 and over 85 age bands, with a declining younger population and a median age of 48 years. Directly linked with this challenge, Monmouthshire has the highest average house prices in Wales creating an affordability issue and a deficit of 20-40 year olds as well as increasing household sizes. If left unchecked this will result in imbalanced communities and socio-economic problems. While a Joint LDP might appear to some as presenting an attractive option of 'bumping' growth to neighbouring Authorities, we must take action to ensure the social and economic sustainability of our communities and the services they rely on. This directly relates to the Well-being agenda. A Monmouthshire LDP is the best mechanism for achieving this outcome in a timely manner.
- 3.25 It is fully acknowledged that the daily lives of our communities are not prescribed by administrative boundaries, and that commuting patterns, retail expenditure, and some aspects of the housing market operate across our boundaries with our neighbours, both east and west. We further recognise that changes such as the Metro and Severn Bridge tolls will have implications for much of the Cardiff Capital Region, and that developments such as at Mamhilad in Torfaen and Glan Llyn in Newport have potential implications for parts of our County. However, it is possible to successfully address these matters through collaborative working without the need for a Joint LDP. One recent example highlighted by WG offices as best practice is the joint Supplementary Planning Guidance between Swansea and Neath Port Talbot Councils to shape the new University campus straddling their boundary.
- 3.26 In terms of other commonalities, as Local Planning Authorities, Blaenau Gwent and Monmouthshire do not share a common boundary, due to the National Park. The Brecon Beacons National Park is commencing work on its own replacement LDP and has indicated that it has no desire to be part of a Joint LDP. The Welsh Government has no power to mandate a National Park to undertake a Joint LDP. Meanwhile, Newport City Council's LDP runs until 2026, and although it must undertake its statutory review in 2019, Newport is one of a small handful of Local Planning Authorities in Wales that has a five year housing land supply. Its LDP is delivering effectively, and indications are that it has no need or desire to commence work on an early replacement Plan. Discussions have been held with officers at Torfaen Council regarding the potential for a two-way Joint LDP, however this has been discounted for the reasons provided below.

---

<sup>1</sup> 2016 population data

<sup>2</sup> Corine Landcover Inventory

<sup>3</sup> Welsh Index of Multiple Deprivation 2014

- 3.27 As stated above, it is considered that a SDP is the appropriate mechanism to provide a proper strategic regional spatial planning framework. The proposed Joint LDP provides an unnecessary sub-regional tier, achieving neither a proper City Region strategic approach nor a truly local Plan that our communities value, engage with and take ownership of.
- 3.28 Moreover, setting up and running the joint working arrangements to deliver a Joint LDP will delay progress on ensuring LDP coverage post 2021, as well as being a distraction from delivering the SDP.
- 3.29 Governance of a Joint LDP can be achieved in one of two ways:
- A Joint Planning Board can be established, which would see representative elected Members from each constituent Planning Authority form the decision-making body for the LDP including its adoption. In addition to the time taken to set this up (leadership, accountability, governance, Member-officer relationships, team culture), there is a potential risk that Council does not take ownership of the LDP. This would manifest itself in future planning application decisions, and could result in a dysfunctional planning system and an absence of certainty or consistency for investors, developers and communities;
  - A joint planning team could be established, simply comprising a shared officer resource to develop a single LDP. That LDP would be reported back to each constituent Council for adoption. In addition to the time taken to set this up (as above), there is a significant risk regarding the delays and uncertainty surrounding Joint LDPs. The only example to date is evidenced by the Gwynedd and Anglesey Joint LDP, which took over 6 years to deliver and was very nearly not adopted by one Council, which would have left both Councils without a development plan. A four-way Joint LDP would emphasise those risks.
- 3.30 The significance of the references above to delays are due to new provisions in the Planning (Wales) Act 2015 which create an ‘expiry date’ for LDPs, beyond which they are no longer the Development Plan for the area. Consequently, the adopted Monmouthshire LDP legally “ceases to be a local development plan” on 31st December 2021. After this date, the Council will be at risk from development proposals without a statutory development plan framework to properly manage them, until such time as a replacement development plan is adopted. This calls into question our ability to ensure sustainable development and to secure S106 planning contributions towards essential infrastructure and affordable housing, without those policy hooks or supplementary planning guidance in place.
- 3.31 In summary, looking in turn at each benefit of Joint LDPs put forward by the Cabinet Secretary, a Joint LDP is not considered to be an appropriate solution in terms of outcome or process:
- Quicker and cheaper Plan preparation: establishing a joint planning policy team and associated leadership, governance and working relationships will take time and will slow down Plan preparation compared to Monmouthshire proceeding with its own LDP. Time is important due to the LDP expiry date. The example of Gwynedd and Anglesey secured indicative financial savings of some £600,000 however it did not result in a quicker Plan and very nearly resulted in no LDP at all. A proportion of the savings were secured via a joint evidence base: Monmouthshire can and will take this approach with neighbours without the need for a Joint LDP;
  - Effective cross-boundary planning to reflect housing markets and economic footprints: There has been a significant maturing of the approach to collaborative working since that first round. The benefits of working much closer with

our neighbouring Councils is accepted and meetings have already been held at officer level to identify areas where we can work jointly to better manage resources, ensure a consistent evidence base, remove duplication and waste, share data, and utilise common methodologies. Significant work is already progressing via the South East Wales Strategic Planning Group (SEWSPG) to agree common methodologies for use across the Cardiff Capital Region. To this end, and in addition to the current SEWSPG collaboration, we will ensure closer liaison/collaboration with those authorities who wish to review their LDP at the current time, in particular Torfaen, including a shared evidence base for key topics. However, each Council will need to ultimately maintain control over timing and governance to responsibly manage the risk of no Plan coverage.

- Lack of capacity, capability and resilience in planning teams: we are confident that Monmouthshire has the capability and resilience to deliver its own LDP, and will ensure that the project is properly resourced;
- Links to Local Government reform: it would be premature and inappropriate to seek to deliver Local Government reform via the planning policy framework. To do so would either presume the future footprint of Councils without any discussion or consultation, or would result in future inefficiencies because Joint LDPs would not align with other service footprints.

### Conclusions:

- 3.32 It is considered that a full revision of the Monmouthshire LDP on an individual basis is the most appropriate means of revising the Plan. This will enable the aforementioned issues to be fully considered/ addressed and importantly will ensure continued Plan coverage in the County, thereby avoiding the risks associated with any policy vacuum. Monmouthshire County Council has the capacity, capability and resilience to deliver its own replacement LDP and the best way to secure outcomes for our communities in a timely and effective manner is to proceed with the Cardiff Capital Region SDP and for Monmouthshire to commence on its own LDP revision, working collaboratively with appropriate neighbouring Councils where possible, for example on a joint evidence base and common methodologies.
- 3.33 This will also assist in meeting the 2021 deadline for having an adopted revised LDP in place to minimise the local policy vacuum that the new Regulations threaten to create.
- 3.34 **Appendix 6** to this report provides the draft Delivery Agreement including Community Involvement Scheme for the new Monmouthshire LDP. The Revised LDP will cover the 2018-2033 period. Preparation of a Delivery Agreement is a key requirement in preparing a revised Plan.
- 3.35 The Delivery Agreement is split into two key parts: the timetable for producing the revised LDP and the Community Involvement Scheme.
- 3.36 The timetable provides a clear indication of when each of the different stages of Plan preparation will take place. Definitive dates are provided up to the deposit stage with indicative dates for later stages. This is an example of a project management approach to ensure that the plan is adequately resourced and delivered on time. The timetable is included in Part 2 of this Delivery Agreement.
- 3.37 The Community Involvement Scheme outlines the Authority's principles of community engagement; its approach in relation to who, how and when it intends to engage with the community and stakeholders, how it will respond to representations and how these representations will inform later stages of plan preparation. This is included as Part 3 of this Delivery Agreement.

3.38 Key milestones are set out in the table below:

Key Stages	Timescale	
Definitive	From	To
Delivery Agreement	January 2018	May 2018
	Full Council – May 2018 Submission to Welsh Government – May 2018 (Response to LPA to be received within 4 weeks)	
Pre-Deposit Participation	July 2018	November 2019
	Report to Council on draft Preferred Strategy – November 2019	
Preferred Strategy (Pre-Deposit) Consultation.	December 2019	October 2020
	Preferred Strategy - 6 week consultation Report to Council on draft Deposit Plan – October 2020	
Statutory Deposit Plan Consultation	November 2020	May 2021
	Deposit Plan - 6 week consultation Report to Council on focused changes and submission of Deposit Plan to Welsh Government – May 2021	
Stages	Timescale	
Indicative		
Submission of LDP to Welsh Government	Summer 2021	
Independent Examination	Autumn 2021	
Inspector's Report	Winter 2021	
Adoption	Early 2022 (must be adopted within 8 weeks of receiving the Inspector's binding report)	

3.39 It is recognised that the above timetable results in a gap in Plan coverage from 1<sup>st</sup> January 2022 until Plan adoption in early (February/March) 2022. However, the timetable set out is considered to be challenging yet realistic. The risk exposure during that 8-12 week period is considered to be manageable. An appeal against an application not determined before 31<sup>st</sup> December 2021 would be unlikely to be determined before the new LDP is adopted, and our new LDP would be at an advanced stage by then. The new LDP must be adopted within 8 weeks of receipt of the Inspector's binding report.

3.40 The Community Involvement Scheme sets out how the Council proposes to proactively involve the community and stakeholders in the preparation of the replacement LDP. While ultimately it is the Council that is responsible for the content of the LDP should it not be possible to achieve consensus, one of the aims of the LDP system is that Plan production is based on effective community involvement in order that a range of views can be considered as part of a process of building a wide consensus on the Plan's strategy and policies. The five ways of working prescribed by the Well Being of Future Generations (Wales) Act are integral to the CIS, namely long-term, integration, involvement, collaboration and prevention. The CIS describes the ways in which the community can influence the LDP at the different stages of the Plan preparation process.

3.41 Monmouthshire County Council's key purpose is to help build sustainable and resilient communities that support the well-being of current and future generations. This is intrinsically linked to land use planning and is therefore key to the delivery of the LDP. Accordingly, the CIS is based on Monmouthshire County Council's four values; openness, fairness, flexibility and teamwork.

#### **4. OPTIONS APPRAISAL**

4.1 This options appraisal has been broken down to attempt to simplify consideration of the various matters being considered, however it is recognised that they are inextricably linked.

4.2 Recommendation 2.1 asks Council to endorse the Review Report for submission to the Welsh Government.

4.3 Recommendation 2.2 asks Council to approve the commencement of a full revision to its Local Development Plan, which would result in a brand new LDP for Monmouthshire for the period up to 2033.

4.4 Recommendation 2.3 asks Council to endorse the draft Delivery Agreement including Community Involvement Scheme for the new LDP for a four week targeted consultation.

4.5 Recommendation 2.4 asks Council to formally resolve to be part of the South East Wales Strategic Development Plan.

#### **4.6 Issue 1: Does Monmouthshire need to revise its LDP?**

4.6.1 'LDP revision' is the process of actually amending, changing or replacing the Local Development Plan. Three options are available as set out and appraised in paragraphs 3.9 to 3.11 above:

- 1) Do nothing;
- 2) Undertake a 'short form' revision of the LDP; or
- 3) Endorse the conclusions of the Review Report and resolve to undertake a 'full revision' of the LDP.

#### **4.7 Issue 2: What planning policy framework best delivers the necessary and desirable planning outcomes for Monmouthshire's communities while ensuring appropriate strategic regional planning and consideration of cross-boundary issues?**

4.7.1 A full Options Appraisal has been undertaken and is attached at **Appendix 5**. The SDP would cover the Cardiff Capital Region (10 Councils plus potentially the Brecon Beacons National Park). In summary, six options have been considered:

- 1) New Monmouthshire LDP without a SDP;
- 2) SDP for the Cardiff Capital Region instead of individual LDPs;
- 3) New Monmouthshire LDP and a SDP;
- 4) Joint (4 footprint) LDP with Newport, Torfaen and Blaenau Gwent and a SDP;
- 5) Joint (2 footprint) LDP with Torfaen only and a SDP;
- 6) Joint (4 footprint) LDP with Newport, Torfaen and Blaenau Gwent without a SDP;

#### **4.8 Issue 3: Delivery Agreement including Community Involvement Scheme**

4.8.1 The regulations require the submission of a Delivery Agreement including Community Involvement Scheme in order to commence a new LDP. This issue is therefore limited to four options:

- 1) Endorse the draft Delivery Agreement including Community Involvement Scheme at **Appendix 6** for targeted consultation for 4 weeks;
- 2) Approve the Delivery Agreement including Community Involvement Scheme at **Appendix 6** for submission to the Welsh Government without consultation;
- 3) Make amendments to the draft Delivery Agreement including Community Involvement Scheme at **Appendix 6** then undertake targeted consultation for 4 weeks;
- 4) Make amendments to Delivery Agreement including Community Involvement Scheme at **Appendix 6** for submission to the Welsh Government without consultation

## 5. EVALUATION CRITERIA

### 5.1 Issue 1: Does Monmouthshire need to revise its LDP?

Option 1: 'Do nothing'

5.1.1 'Do nothing' is easily discounted as a viable or appropriate option for the same reasons as those set out in paragraph 3.5 above and in the Draft Review Report. Even if the LDP were functioning perfectly, work must commence on a new Plan to cover the period after 31<sup>st</sup> December 2021 when the current LDP expires.

Option 2: 'Short form' revision

5.1.2 A 'short form' revision would retain the vision, issues, objectives, and spatial strategy of the current LDP but would make focused changes to address identified issues such as housing land supply and affordability. At adoption, regulations require that the amended LDP must have a 10 year lifespan, so this option would be the continuation of the current LDP strategy until approximately 2030. Welsh Government Planning Division advice is that this option is not appropriate for Monmouthshire. However, far more important than that is the question of whether or not a continuation of the current LDP strategy provides the outcomes that our communities want, or that address any of the critical challenges identified as part of Future Monmouthshire.

Option 3: 'Full revision'

5.1.3 Full revision results in a brand new LDP, which it is recommended should run from 2018 to 2033. This aligns with Torfaen's proposals and therefore enables a shared evidence base to be prepared for key topic areas.

#### **Recommendation on Issue 1**

5.1.4 Based on the evidence contained in the Review Report, **Option 3 (Full LDP revision)** is the preferred option. The LDP should be revised and that this should take the form of a full revision procedure, i.e. a brand new LDP. Key reasons for reaching this conclusion include:

- The inability to meet the adopted LDP's housing requirement and the resulting failure to maintain a 5 year housing land supply indicates that either additional housing sites are required or the level of housing growth required by the Plan's strategy will need to be reconsidered;
- The need to reassess undelivered housing allocations to determine whether they remain viable and deliverable which could result in existing allocations being removed from the LDP and new sites added. The LDP's reliance on strategic sites suggests that the spatial distribution of housing growth will need to be reconsidered;



- The extent of updates required to the evidence base for an extended Plan period, including updated needs and land requirements, could result in significant changes to the Plan;
- Wider contextual matters that have occurred since the Plan's adoption, including the Cardiff Capital Region City Deal and announcement to abolish the Severn Bridge Tolls need to be fully considered.

5.1.5 The potential cumulative changes required to the LDP as a consequence of these factors could result in a Plan that is distinctly different to the one adopted. Accordingly, it is considered that the full revision procedure would be the most appropriate means of revising the LDP. Importantly, the full revision procedure would enable a comprehensive reconsideration of the Plan's strategy, having regard to an extended Plan period and the wider context including the Cardiff Capital Region City Deal and Future Monmouthshire aspirations, together with the economic opportunities associated with the abolishment of the Severn Bridge Tolls.

## 5.2 **Issue 2: What planning policy framework best delivers the necessary and desirable planning outcomes for Monmouthshire's communities while ensuring appropriate strategic regional planning and consideration of cross-boundary issues?**

Option 1: New Monmouthshire LDP without a SDP

5.2.1 This option is not considered to properly address the need for, or secure the benefits of, proper strategic regional cross-boundary spatial planning for those matters of regional significance.

Option 2: SDP for the Cardiff Capital Region instead of individual LDPs

5.2.2 This option would not provide full Plan coverage for Monmouthshire until such time as both the SDP and subsequent 'light touch' LDP are adopted, which is unlikely to be before 2025. Although arguably the most efficient use of resources and the most co-ordinated approach on a regional basis, given the significant development pressures in Monmouthshire and the absence of a 5 year housing land supply, this option would result in an extended period of significant risk for Monmouthshire without an effective framework to shape growth and secure infrastructure locally.

Option 3: New Monmouthshire LDP and a SDP

5.2.3 This is the preferred option, securing both timely full Plan coverage for Monmouthshire and enabling a proper strategic regional cross-boundary spatial planning for those matters of regional significance. The resource pressures associated with this option are considered to be outweighed by the benefits in terms of outcomes. The benefits of cross-boundary co-ordination can be achieved via collaborative working, joint evidence and common methodologies on appropriate topics with relevant neighbours while avoiding the risks associated with Joint LDPs.

Option 4: Joint (4 footprint) LDP with Newport, Torfaen and Blaenau Gwent and a SDP

5.2.4 The proposed four footprint Joint LDP provides an unnecessary sub-regional tier, achieving neither a proper City Region strategic approach nor a truly local Plan that our communities value, engage with and take ownership of. Preparation of a Joint LDP is not a prerequisite to an SDP, and in fact would distract from progress on a SDP. There are significant risks to securing adoption of and/or buy-in to a Joint LDP which unnecessarily expose Monmouthshire to a lack of Plan coverage and the associated issues identified in the latter part of paragraph 5.2.2 above.

Option 5: Joint (2 footprint) LDP with Torfaen only and a SDP

5.2.5 This main benefit of this option relates to ensuring cross-boundary coordination with a Council with whom Monmouthshire shares some commonalities, however it is

accompanied by the time delay of establishing joint working and the governance risk around Plan adoption, which could result in neither Council having an adopted Plan. The benefits of cross-boundary co-ordination can be achieved under Option 3 via collaborative working, joint evidence and common methodologies on appropriate topics. This secures the benefits while mitigating the risks.

Option 6: Joint (4 footprint) LDP with Newport, Torfaen and Blaenau Gwent without a SDP

- 5.2.6 The proposed four footprint Joint LDP provides a sub-regional tier, achieving neither a proper City Region strategic approach nor a truly local Plan that our communities value, engage with and take ownership of. This option is not considered to properly address the need for, or secure the benefits of, proper strategic regional cross-boundary spatial planning for those matters of regional significance.

### **Recommendation on Issue 2**

- 5.2.7 Based on the reasons given in the Options Appraisal at **Appendix 5** and summarised above, **Option 3 (new Monmouthshire and a SDP for the Cardiff Capital Region)** is the preferred option.

### **5.3 Issue 3: LDP Delivery Agreement including Community Involvement Scheme**

Option 1: Endorse the draft Delivery Agreement including Community Involvement Scheme for targeted consultation for 4 weeks

- 5.3.1 This is the preferred option. The draft Delivery Agreement including Community Involvement Scheme at **Appendix 6** are considered to be challenging but achievable in terms of the timetable, and appropriate in terms of community involvement, having regard to the relevant regulations as well as the five ways of working in the Well-being Act.

Option 3: Make amendments to the draft Delivery Agreement including Community Involvement Scheme at **Appendix 6** then undertake targeted consultation for 4 weeks

- 5.3.2 It is not considered necessary to amend the draft document so this option is discounted.

Options 2 and 4: To either endorse or amend the draft Delivery Agreement including Community Involvement Scheme at **Appendix 6** for submission to the Welsh Government without consultation

- 5.3.3 Notwithstanding the challenging timetable, it would seem counter-intuitive to unilaterally set out a Community Involvement Scheme. Options 2 and 4 should therefore be discounted.

### **Recommendation on Issue 3**

- 5.3.4 Based on the reasons above, **Option 1 (endorse the draft Delivery Agreement including Community Involvement Scheme for targeted consultation)** is the preferred option.

## **6. REASONS:**

- 6.1 Under the Planning and Compulsory Purchase Act (2004), Planning (Wales) Act 2015 and associated regulations, Local Planning Authorities are required to monitor the performance of their LDP and take action if needed. A full review of Monmouthshire's LDP has been undertaken and consulted on, culminating in the Review Report at **Appendix 1**. The recommendation of this evidence is that Monmouthshire should endorse the findings of the Review Report (**recommendation 2.1**) and should commence on a full revision of its LDP (i.e. a brand new LDP) (**recommendation 2.2**).

- 6.2 A full options appraisal (**Appendix 5**) has been undertaken of the most appropriate way to undertake this, bearing in mind the desire to deliver outcomes for our

communities, the Council's purpose as identified in the 2018-2022 Corporate Plan, the need for strategic spatial planning, changes in legislation and context (for example the Well-being Act and the decision on the Severn Bridge tolls), and the letters from the Cabinet Secretary dates 13<sup>th</sup> December 2017 (**Appendix 3**).

- 6.3 The conclusion from the above is that Monmouthshire should commence work on its own replacement LDP (**recommendation 2.2**), working collaboratively with appropriate neighbours as applicable, in addition to Monmouthshire County Council formally agreeing to be part of the Cardiff Capital Region SDP (**recommendation 2.4**).
- 6.4 In order to commence work on its new LDP, Council endorsement is sought for four week targeted consultation on the draft Delivery Agreement and Community Infrastructure Scheme (**Appendix 6**) (**recommendation 2.3**).
- 6.5 The above recommendations ensure Monmouthshire maintains statutory Development Plan coverage to shape and manage development proposals, allows the Council and our communities to review future growth options and their relationship with the pressing challenges and opportunities before us, such as our demography, affordability and availability of housing, economic growth and our role in the wider region.

## **7. RESOURCE IMPLICATIONS:**

- 7.1 Officer time and costs associated with the preparation of a new LDP will be met within existing budgets, including the LDP reserve that has been set aside since 2014. Should Council approve the recommendations set out in this report, separate Cabinet Member approval will be sought to create a fixed term additional post in the Policy Team funded from existing budgets. Further political reporting will be required in due course when decisions are needed regarding resources for the SDP, should they fall beyond the reserves in place.

## **8. WELL-BEING OF FUTURE GENERATIONS IMPLICATIONS:**

### Sustainable Development

- 8.1 Under the 2004 Act the LDP is required to be subject to a Sustainability Appraisal (SA). The role of the SA is to assess the extent to which planning policies would help to achieve the wider environmental, economic and social objectives of the LDP. In addition, the European Strategic Environmental Assessment (SEA) Directive requires the '*environmental assessment*' of certain plans and programmes prepared by local authorities, including LDP's. All stages of the new LDP will be subject to a SA, whose findings will be used to inform the development of LDP strategy, policies and site allocations in order to ensure that the LDP would be promoting sustainable development. It will be necessary to update the environmental baseline, plans, policies and programmes as part of any LDP revision process. The new LDP would also include a Well-being Assessment and Health Impact Assessment (potentially as integral part of the SA).
- 8.2 A Future Generations Evaluation (including equalities and sustainability impact assessment) is attached to this report at **Appendix 7**.

### Equalities

- 8.3 The LDP will be subjected to an Equality Challenge process and due consideration given to the issues raised. The Review Report provides an analysis of the adopted LDP vision, issues, objectives, strategy and policies. As with the sustainable development implications considered above, any revised LDP will itself require an Equalities and Well-being of Future Generations Impact Assessment to be carried out.

## Safeguarding and Corporate Parenting

- 8.3 There are no safeguarding or corporate parenting implications arising directly from this report. Community engagement with young people or vulnerable adults would only be carried out via existing appropriate organisations such as schools and Engage 2 Change. Matters pertinent to the new LDP or SDP will be considered as those projects progress.

### **9. CONSULTEES**

- Colleagues within and working closely with the planning service have been engaged via officer working groups.
- SLT
- Cabinet
- An all Member Seminar was held on 30 November 2017 to seek views on the extent to which the current LDP is successfully delivering on its vision, strategy and objectives.
- Awareness of the Draft Review Report consultation and potentially forthcoming LDP revision was raised with other MCC services via SMT and via attendance at all Town and Community Council Cluster meetings and Bryn-y-Cwm Area Committee in January 2018.
- All parties identified as statutory consultees on the LDP and all parties who requested to be kept informed on LDP matters (433 people/organisations) were consulted on the Draft Review Report.
- The Democratic Services Committee has been invited to comment of the draft Community Involvement Scheme.

### **10. BACKGROUND PAPERS:**

- Monmouthshire Adopted LDP (February 2014)
- Monmouthshire Local Development Plan Annual Monitoring Reports, 2014-15, 2015-16, 2016-17

Appendices 1a-1c: LDP Review Report

Appendix 2: Summary of representations made on Draft Review Report ordered by question

Appendix 3: Letters from Lesley Griffiths dated 13<sup>th</sup> December 2017

Appendix 4: Responses to Lesley Griffiths from CCR Leaders (6<sup>th</sup> February 2018) and Councillor Peter Fox OBE (28<sup>th</sup> February 2018)

Appendix 5: Options Appraisal

Appendix 6: Draft Delivery Agreement including Community Involvement Scheme

Appendix 7: Future Generations Evaluation

### **11. AUTHORS & CONTACT DETAILS:**

Mark Hand (Head of Planning, Housing and Place-Shaping)

**Tel:** 01633 644803.

**E Mail:** [markhand@monmouthshire.gov.uk](mailto:markhand@monmouthshire.gov.uk)

Rachel Lewis (Planning Policy Manager)

**Tel:** 01633 644827

**E Mail:** [rachellewis@monmouthshire.gov.uk](mailto:rachellewis@monmouthshire.gov.uk)

## Evaluation Criteria – Cabinet, Individual Cabinet Member Decisions & Council

<b>Title of Report:</b>	<b>Monmouthshire Local Development Plan – commencement of LDP revision and SDP</b>
<b>Date decision was made:</b>	<b>19<sup>th</sup> March 2018</b>
<b>Report Author:</b>	<b>Mark Hand / Rachel Lewis</b>

### What will happen as a result of this decision being approved by Cabinet or Council?

What is the desired outcome of the decision?

What effect will the decision have on the public/officers?

To commence preparation of a replacement Local Development Plan (LDP) for Monmouthshire, the first stage of which is targeted consultation on the draft Delivery Agreement including Community Involvement Scheme.

For Monmouthshire County Council to formally agree to be part of the Cardiff Capital Region Strategic Development Plan (SDP).

The desired outcome is to secure a robust and effective planning policy framework for Monmouthshire that supports delivery of the Council's purpose of helping build resilient and sustainable communities that support the well-being of current and future generations. The policy framework will deliver appropriate levels of economic and physical growth with associated infrastructure to sustain the County and its communities while protecting the best of our built and natural environment. The new LDP will reflect the needs and desires of our communities and our future, with effective engagement and buy-in.

*Delivery of the new LDP will be measured against the timetable set out in the Delivery Agreement. The SDP would have its own Delivery Agreement.*

*Once adopted, both Plans would be monitored annually to identify if the desired outcomes are being achieved.*

### What benchmarks and/or criteria will you use to determine whether the decision has been successfully implemented?

Think about what you will use to assess whether the decision has had a positive or negative effect:

Has there been an increase/decrease in the number of users

Has the level of service to the customer changed and how will you know

If decision is to restructure departments, has there been any effect on the team (e.g increase in sick leave)

This will be measured in different ways at different stages:

- Delivery in accordance with the timetable set out in the Delivery Agreement
- Sustainability Appraisal (including well-being and health impact assessments) and key stages during Plan preparation
- The LDP is found to be sound at examination and is adopted by the Council
- Subsequent annual monitoring show that the Plan is delivering on its objectives and a five year housing land supply is maintained.

*Paint a picture of what has happened since the decision was implemented. Give an overview of how you fared against the criteria. What worked well, what didn't work well. The reasons why you might not have achieved the desired level of outcome. Detail the positive outcomes as a direct result of the decision. If something didn't work, why didn't it work and how has that effected implementation.*

### What is the estimate cost of implementing this decision or, if the decision is designed to save money, what is the proposed saving that the decision will achieve?

Give an overview of the planned costs associated with the project, which should already be included in the report, so that once the evaluation is completed there is a

quick overview of whether it was delivered on budget or if the desired level of savings was achieved.

It is intended that costs associated with the preparation of the new LDP will be met via the existing budget and LDP reserve. The current LDP cost approximately £770,000 excluding staff time, but it is expected that updating existing evidence and working collaboratively with Torfaen/neighbours will reduce costs. Costs and resources relating to the SDP are currently unknown and will need to be subject to further political reporting in due course.

*Give an overview of whether the decision was implemented within the budget set out in the report or whether the desired amount of savings was realised. If not, give a brief overview of the reasons why and what the actual costs/savings were.*



**Monmouthshire County Council  
Local Development Plan**

**LDP Review Report**

**March 2018**

**Planning Policy Service**

**Monmouthshire County Council**

County Hall, Rhadyr, Usk, Monmouthshire NP15 1GA

**Tel:** 01633 644429

**Email:** [planningpolicy@monmouthshire.gov.uk](mailto:planningpolicy@monmouthshire.gov.uk)

## CONTENTS

	<b>Page</b>
<b>1. Introduction</b>	<b>2</b>
<b>2. What Issues have been considered in the LDP Review?</b>	
2.1 LDP Annual Monitoring Report – Key Findings	4
2.2 Contextual Changes	6
2.3 Evidence Base Change – Welsh Government Population and Household Projections	12
<b>3. What Potential Changes are required to the LDP?</b>	<b>16</b>
3.1 Review of LDP Vision, Issues and Objectives	16
3.2 Review of LDP Strategy	20
3.3 Review of LDP Policies	28
<b>4. What are the Future LDP Evidence Base Requirements?</b>	<b>43</b>
<b>5. Joint Plans /Joint Working</b>	<b>45</b>
<b>6. Conclusions: What Form of Plan Revision is Required?</b>	<b>51</b>

### Appendices:

1. Summary of LDP Policy Review
2. Draft Review Report Consultation - Summary of the Key Issues raised
3. Cabinet Secretary for Energy, Planning & Rural Affairs Letters: Invitation to Prepare a Strategic Development Plan and Joint Local Development Plan



## 1.0 Introduction

- 1.1 The adopted Monmouthshire Local Development Plan (LDP) sets out the Council's vision and objectives for the development and use of land in the County, together with the policies and proposals to implement them over a ten year period to 2021. The Plan area excludes that part of the County contained within the Brecon Beacons National Park.
- 1.2 The LDP was adopted on 27<sup>th</sup> February 2014 and, in accordance with statutory requirements, has subsequently been monitored on an annual basis with three Annual Monitoring Reports (AMRs) published to date. The AMRs assess the extent to which the LDP strategy, objectives and policies are being delivered and implemented.

### **Full LDP Review**

- 1.3 To ensure that LDPs are kept up-to-date, local planning authorities are required to commence a full review of their Plans at least once every four years following Plan adoption, or sooner if the findings of the AMRs indicate significant concerns with a Plan's implementation. If the findings of a Plan review indicate that the Plan is not functioning effectively/ there are concerns with the implementation of the Plan, then local planning authorities must undertake a revision of the Plan. This can either take the form of a short form or full revision procedure.
- 1.4 The 2016 Monmouthshire AMR recommended an early review of the LDP as a result of the need to address the shortfall in the housing land supply and to facilitate the identification and allocation of additional housing land. The 2017 AMR, which forms the first stage of the review process, confirms the recommendation to continue with an early review of the LDP due to the housing land supply shortfall, as detailed in Section 2.1.
- 1.5 The LDP Regulations allow for a 'selective review' of part (or parts) of a LDP. Such a provision would allow for a partial review of the LDP to cover issues associated with the housing land supply and site selection, in accordance with the recommendation of the 2016 and 2017 AMRs. The Council, however, is required to commence a full review of the LDP every four years. This would mean that a full review to meet statutory requirements would have to commence in February 2018. It is considered, therefore, more appropriate to undertake a full review of the Plan to consider all aspects of the LDP in order to fully assess the nature and scale of revisions that might be required. This will also assist in meeting the 2021 deadline for having an adopted revised LDP in place to avoid the local policy vacuum that the new Regulations threaten to create. As it currently stands, the adopted LDP will cease to exist at the end of the Plan period (i.e. 31 December 2021). Accordingly, a revised LDP will need to be adopted by 1 January 2022 to ensure that Monmouthshire has an up-to-date planning policy framework in place.

- 1.6 Consequently, a full review of the LDP commenced in 2017, with a Draft Review Report published for consultation between 11 December 2017 and 5 February 2018. Views were sought on the issues that should be considered in the full review of the LDP, together with the subsequent potential changes required to the LDP. Opinions were also sought on whether the changes identified would warrant a revision to the LDP and, if so, whether a short form or full revision of the LDP would be appropriate. A total of 60 representors responded to the consultation. The responses received from the consultation have been evaluated and informed the final Review Report where appropriate. A brief overview of the key findings from the consultation is provided in the relevant sections of the report, with a more detailed summary of the main issues raised provided in Appendix 2. The full consultation report, incorporating MCC's responses and recommended changes, can be viewed via the following link: [LDP Draft Review Report Consultation Responses - Representor Order.pdf](#)

### **Purpose of the Review Report**

- 1.7 The review of the LDP has culminated with the publication of this final Review Report. This report provides an overview of the issues that have been considered as part of the full review process and subsequently identifies the changes that are likely to be needed to the LDP, based on evidence. It also makes a conclusion on the type of revision procedure to be followed in revising the LDP. The LDP review has been informed by the findings of preceding AMRs, significant contextual changes, updates to the evidence base and responses to the Draft Review Report consultation.

### **Review Report Format and Content**

- 1.8 The Review Report is structured as follows:

**Section 1 Introduction** – outlines the requirement for, the purpose and structure of the Review Report.

**Section 2 Issues Considered** – provides an overview of the issues that have been considered as part of the full LDP review process:

- Key findings of the most recent (October 2017) AMR
- Significant contextual changes that have occurred since Plan adoption
- Revised Welsh Government population and household projections – a key evidence base change that has occurred since Plan adoption.

**Section 3 Potential Changes to the LDP** – having regard to the issues considered this section sets out the potential changes required to the LDP and why, based on a:

- Review of the LDP vision, issues and objectives
- Review of the LDP strategy
- Review of the LDP policies and allocations

**Section 4 Future Evidence Base Requirements** – outlines evidence updates/additional evidence likely to be required as part of the LDP revision process.

**Section 5 Joint Plans /Joint Working** – considers the potential opportunities for preparing a Joint Plans / joint evidence base with neighbouring local planning authorities

**Section 6 Conclusions** – makes a conclusion on the type of revision procedure to be followed in revising the LDP.

**Appendix 1** – provides a summary of the LDP Policy Review.

**Appendix 2** – provides a summary of the key issues raised to the Draft Review Report consultation.

**Appendix 3** – sets out the Cabinet Secretary for Energy, Planning & Rural Affairs letters inviting the preparation of a Strategic Development Plan and Joint Local Development Plans.

## 2.0 What Issues have been Considered in the LDP Review?

### 2.1 LDP Annual Monitoring Report – Key Findings

- 2.1.1 As advised in the LDP Manual<sup>1</sup>, a Plan review should, amongst other things, draw on the findings of published Annual Monitoring Reports (AMRs). The most recent Monmouthshire AMR was published in October 2017 and covers the period 1 April 2016 – 31 March 2017<sup>2</sup>.
- 2.1.2 The results of the latest AMR demonstrates that good progress has been made in implementing many of the Plan's policies with many of the indicator targets and monitoring outcomes being achieved. The analysis also indicates that there are various policy indicators which are not being achieved but with no corresponding concerns over policy implementation. Further investigation has determined that there are justified reasons for the performance recorded and this is not representative of any fundamental issue with the implementation of the policy framework or strategy at this time.
- 2.1.3 There are, however, several key policy indicator targets and monitoring outcomes relating to housing provision that are not currently being achieved, with the following areas of concern identified:
- **Dwelling Completions** - A total of 238 new dwelling completions (general market and affordable) were recorded between 1 April 2016 and 31 March 2017. Cumulatively, there has been a total of 667 dwelling completions recorded since the Plan's adoption (i.e. 27 February 2014). This is significantly below the identified LDP AMR target of 488 dwelling completions per annum.
  - **Affordable Housing Dwellings Completions** - A total of 47 affordable dwelling completions were recorded between 1 April 2016 and 31 March 2017. Cumulatively, there has been a total of 127 affordable dwelling completions recorded since the Plan's adoption. This is significantly below the identified LDP target of 96 affordable dwelling completions per annum. This relates directly to the construction progress of LDP housing sites, as delays mean the higher LDP affordable housing requirement is not yet being realised in terms of completions. Notwithstanding this, it is recognised that viability issues have reduced affordable housing levels on three LDP strategic sites (Deri Farm, Mabey Bridge and Sudbrook Paper Mill).
  - **Housing Land Supply** - The Monmouthshire Joint Housing Land Availability Study (JHLAS) for the 2016-17 period demonstrates that the County had 4.0 years housing land supply (based on the residual methodology prescribed in

---

<sup>1</sup> Local Development Plan Manual, Edition 2, August 2015 (Welsh Government)

<sup>2</sup> The 2016-17 AMR can be accessed via the following link:

<http://www.monmouthshire.gov.uk/app/uploads/2017/10/AMR-Final.pdf>

TAN1). This is the second consecutive year that the land supply has fallen below the 5 year target.

- **Delivery of Strategic Housing Sites** - There has been limited progress with the delivery of allocated strategic housing sites. With the exception of the Former Paper Mill site at Sudbrook and the Wonastow Road site at Monmouth, the remaining strategic sites have yet to obtain planning permission, albeit that some<sup>3</sup> have been approved but are awaiting completion of the legal agreements. The current status of LDP strategic sites is provided in Table 4, Appendix 1.

2.1.4 These findings indicate that the LDP's key housing provision policies are not being delivered as anticipated and the subsequent lack of a 5 year housing land supply remains a matter of concern. While there is sufficient housing land allocated in the LDP to meet the identified dwelling requirements over the Plan period, sites are not progressing as quickly as expected for a variety of reasons, many of which are independent of the planning system such as the wider economy and housing market, although for the last few years both the wide economy and housing market have been at their strongest since the recession. Site viability is also a major factor impacting on site deliverability and viability assessments slow down the determination of planning applications. The slower than anticipated delivery rate is clearly impacting on the amount of general market and affordable housing being delivered through the planning system which does suggest that there is a need for additional site allocations.

2.1.5 Accordingly, the most recent AMR recommends to continue with an early review of the Monmouthshire LDP as a result of the need to address the shortfall in the housing land supply and facilitate the identification/allocation of additional housing land. Further details on housing provision and land supply is set out in Section 3.2.

---

<sup>3</sup> Deri Farm, Abergavenny and Rockfield Farm, Undy. Fairfield Mabey, Chepstow received consent in November 2017 following the publication of the 2017 AMR.

## **2.2 Contextual Changes**

- 2.2.1 A wide range of contextual material has been published since the adoption of the LDP. This includes national legislation and relevant plans, policies and strategies at the national, regional and local level. The most significant of these changes are set out below.

### **Legislative Context**

#### **Planning (Wales) Act, 2015**

- 2.2.2 The Planning (Wales) Act came into force in July 2015. It sets out a series of legislative changes to deliver reform of the planning system in Wales, to ensure that it is fair, resilient and enables development. The Act addresses 5 key objectives which includes strengthening the Plan-led approach to planning. The Act also introduces a legal basis for the preparation of the National Development Framework (NDF) and Strategic Development Plans (SDP), which are discussed in further detail below.

#### **Well-being of Future Generations Act, 2015**

- 2.2.3 The Well Being and Future Generations (Wales) Act gained Royal Assent in April 2015. The Act strengthens existing governance arrangements for improving the well-being of Wales by ensuring that sustainable development is at the heart of government and public bodies. It aims to make a difference to the lives of people in Wales in relation to a number of well-being goals including improving health, culture, heritage and sustainable resource use. The Act provides the legislative framework for the preparation of Local Well-being Plans which will replace Single Integrated Plans. The Act places a well-being duty on public bodies, including local authorities, to carry out sustainable development and to improve the economic, social, environmental and cultural well-being of their area by contributing to the achievement of the seven well-being goals (as detailed in paragraph 3.1.4). The Act also sets out five ways of working needed for public bodies to achieve the seven well-being goals: (1) Long-term; (2) Integration; (3) Involvement; (4) Collaboration; (5) Prevention. Given that sustainable development is the core underlying principle of the LDP (and SEA) there are clear associations between the aspirations of both the LDP and the Act / Local Well-being Plans. The potential implications of the Act and Local Well-being Plans for any revised LDP are considered in more detail in Section 3.1.

#### **Environment (Wales) Act, 2016**

- 2.2.4 The Environment (Wales) Act received Royal Assent in March 2016 and sits alongside both the Planning (Wales) Act 2015 and the Well-being of Future Generations (Wales) Act 2015 in promoting the sustainable use, management and development of Welsh resources. The Environment (Wales) Act introduces new legislation for the environment and provides an iterative framework which ensures that managing Wales' natural resources sustainably will be a core consideration in decision-making.

The Act also requires Welsh Government to produce a Natural Resources Policy that sets out the priorities, risks and opportunities for managing Wales' natural resources sustainably, as detailed below.

#### **Historic Environment (Wales) Act, 2016**

- 2.2.5 The Historic Environment (Wales) Act 2016 received Royal Assent in March 2016. The Act has three main aims: give more effective protection to listed buildings and scheduled monuments; improve the sustainable management of the historic environment; and introduce greater transparency and accountability into decisions taken on the historic environment. The Act makes important changes to the two main UK laws that provide the legislative framework for the protection and management of the historic environment: the Ancient Monuments and Archaeological Areas Act 1979 and the Planning (Listed Buildings and Conservation Areas) Act 1990. The Act also contains new stand-alone provisions relating to historic place names, historic environment records and the Advisory Panel for the Historic Environment in Wales. Any implications for the LDP will be considered through the LDP revision process.

#### **Housing (Wales) Act, 2014**

- 2.2.6 The Housing (Wales) Act 2014 received Royal Assent in September 2014 and aims to improve the supply, quality and standards of housing in Wales. One of the key provisions of the Act places a duty on local authorities to assess the accommodation needs of Gypsy and Travellers and to provide site(s) for Gypsy and Travellers where a need has been identified. Accordingly, a Gypsy Traveller Accommodation Assessment (GTAA) has been prepared for Monmouthshire which was submitted to Welsh Government in February 2016 and subsequently agreed by the Welsh Minister in December 2016. Gypsy and Traveller needs will be given further consideration through the LDP revision process, as detailed in section 3.3.

#### **National Context**

##### **Natural Resources Policy**

- 2.2.7 In line with the Environment (Wales) Act 2015 the Welsh Government produced a Natural Resources Policy (NRP) in August 2017. The focus of the NRP is the sustainable management of Wales' natural resources, to maximise their contribution to achieving goals within the Well-being of Future Generations Act. The NRP sets out three National Priorities: delivering nature-based solutions, increasing renewable energy and resource efficiency, and, taking a place-based approach. The NRP also sets the context for Area Statements, which will be produced by Natural Resources Wales, ensuring that the national priorities for sustainable management of natural resources inform the approach to local delivery. Local Planning Authorities must have regard to the relevant area statement in Local Development Plans. The implications of the NRP and the relevant Area Statement, which is due to be finalised in 2019, for the LDP will be considered through the revision process.

## **National Development Framework**

- 2.2.8 The Welsh Government has commenced work on the production of a National Development Framework (NDF) which will replace the Wales Spatial Plan. The NDF will set out the 20 year spatial framework for land use in Wales, providing a context for the provision of new infrastructure/growth. It will concentrate on development and land use issues of national significance which the planning system is able to influence and deliver. WG undertook a Call for Evidence and Projects between December 2016 and March 2017 and will be consulting on Issues and Options in April 2018. Any resultant implications of the NDF will be considered through the LDP revision process.

## **Planning Policy Wales and Technical Advice Notes**

- 2.2.9 A number of amendments have been made to Planning Policy Wales (PPW) and supporting Technical Advice Notes (TANs) since the LDP was adopted as listed below. Where relevant, the implications of these amendments for the LDP are set out in the LDP Policy Review (section 3.3).

### **PPW Amendments**

- Chapter 1: Introduction (November 2016)
- Chapter 2: Local Development Plans (January 2016 & November 2016)
- Chapter 3: Development Management (November 2016)
- Chapter 4: Planning for Sustainability (July 2014, January 2016 & November 2016)
- Chapter 6: Historic Environment (November 2016)
- Chapter 10: Retail and Commercial Development (November 2016)
- Chapter 14: Minerals (January 2016)

### **Technical Advice Note (TAN) Amendments**

- TAN1: Joint Housing Land Availability Studies (January 2015).
- TAN4: Retail and Commercial Development (November 2016).
- TAN12: Design (July 2014 with further amendments in March 2016).
- TAN20: Planning and the Welsh Language (October 2017).
- TAN21: Waste (February 2014).
- TAN22: Planning for Sustainable Buildings was deleted by WG in July 2014.
- TAN23: Economic Development (February 2014).
- TAN24: The Historic Environment (May 2017).

- 2.2.10 PPW is currently being restructured by the Welsh Government to reflect the seven well-being goals and five ways of working set out in the Well-being of Future Generations Act. The Welsh Government is currently consulting on a draft revised PPW and any subsequent implications for the LDP will be considered through the revision process.



## **Longitudinal Viability Study of the Planning Process<sup>4</sup>**

- 2.2.11 This report identifies reasons why proposed housing developments that are assessed as deliverable during the LDP preparation process are becoming stalled due to viability issues at later planning stages. It also makes recommendations covering all stages of the planning process, from site identification during the preparation of a Local Development Plan to the assessment of sites at the development management stage. Regard will be given to the findings of this report in the Plan revision process. However, the report recommendations have not yet been translated into national planning policy guidance (PPW/LDP Manual).

### **Regional Context**

#### **Strategic Development Plans (SDP)**

- 2.2.11 The Planning (Wales) Act provides a legal framework to allow for the preparation of Strategic Development Plans. 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 way. SDPs will address cross-boundary issues at a regional level and must be in general conformity with the NDF. The Regulations make reference to three potential strategic planning areas including South East Wales. It is anticipated that Monmouthshire will be part of this strategic planning area, in alignment with the Cardiff Capital Region City Deal proposals. Regional discussions on the options for progressing a SDP are ongoing and any subsequent progress will be considered through the LDP revision process.

#### **Cardiff Capital Region and City Deal**

- 2.2.12 The Cardiff Capital Region (CCR) consists of ten local authorities across the South East Wales region, including Monmouthshire. The Authorities forming the Capital Region are progressing the City Deal to fund projects aimed at boosting the competitiveness of the region over the next 20 years. The CCR City Deal was formally ratified on March 1<sup>st</sup> 2017 and will help boost economic growth by improving transport links, increasing skills, helping people into work and giving businesses the support they need to grow. A CCR Transition Plan will be produced and will detail the key activities to be undertaken. The resulting proposals for investment represent a significant opportunity for both Monmouthshire and the region. Accordingly, the aspirations of the CCR will be a key consideration for the LDP revision.

---

<sup>4</sup> February 2017, Arcadis (UK) Ltd on behalf of Welsh Government

## **Local Context**

### **Local Well-being Plans (LWBP)**

- 2.2.13 Under the provisions of the Well-being of Future Generations Act, every Public Service Board in Wales must publish a Local Well-being Plan by May 2018. Replacing the Single Integrated Plan (SIP), the Monmouthshire Local Well-being Plan will look at the economic, social, environmental and cultural well-being of the county and will have clear links with the LDP where it relates to land use planning. A Local Well-being Assessment was adopted by the Public Service Board in April 2017, the findings of which have informed the priorities of the Local Well-being Plan (LWBP). The Draft LWBP has recently been subject to consultation. Further detail on the Local Well-being Plan and the potential implications for the LDP is set out in Section 3.1.

### **Future Monmouthshire**

- 2.2.14 Monmouthshire County Council has embarked on a Future Monmouthshire project to re-evaluate the needs and aspirations of its communities and to consider how a 'Council of the Future' will seek to meet those challenges. The community engagement work undertaken in relation to this will run alongside and be integral to work on the Local Well-being Plan. The results of this engagement and other relevant evidence gathered for this exercise will inform the revised LDP.

### **Economic Considerations**

- 2.2.15 Key economic activity data for Monmouthshire and Wales from the LDP base date of 2011 to the 31 March 2017 is set out in the most recent AMR. The data demonstrates that in general Monmouthshire is performing well in terms of unemployment, economic activity and earnings indicators and continues to outperform Wales on these economic indicators. In contrast, however, evidence set out in the AMR 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. While it is unlikely that this is something that the land use planning system can directly influence, further consideration will be given to this as part of the Future Monmouthshire project and, if relevant, via future LDP revision.

### *House Prices*

- 2.2.16 Since LDP adoption, Land Registry data indicates that average house prices in Monmouthshire have increased significantly. Average prices in quarter 1 2017 (January to March) stood at £231,857 which is considerably higher than the 2012 quarter 4 (October to December) baseline price of £188,720 (22.8% increase). The reduction of the Severn Bridge Tolls in January 2018, abolition of the tolls at the end of 2018 and future plans for the South East Wales Metro could further impact house prices in Monmouthshire. The implications of such impacts will need to be considered

through the LDP revision process. Consideration will also need to be given to Monmouthshire's demographic pressures associated with a significantly ageing population and the aspiration to retain younger people in the County, and the potential implications for the housing market.

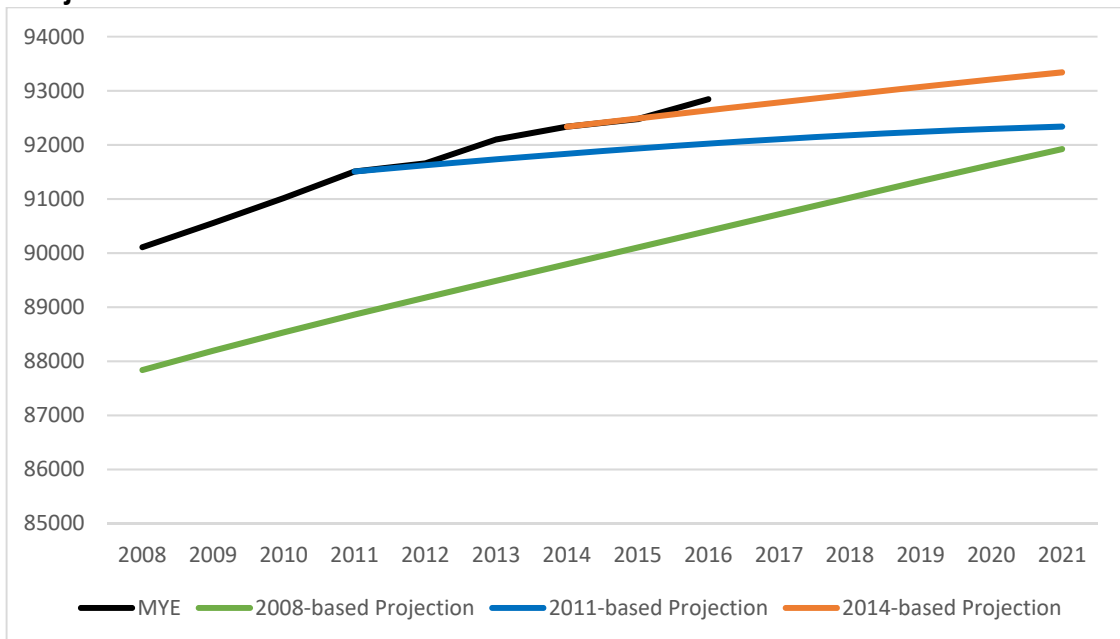
## **2.3 Evidence Base Change – Welsh Government Population and Household Projections**

- 2.3.1 The purpose of this section is to analyse the implications of the recent population and household projections for the current Plan period. What they say for any extended Plan period would be a matter for any LDP revision.
- 2.3.1 At the time of the preparation and adoption of the LDP, Planning Policy Wales (PPW) at paragraph 9.2.2 stated that the Welsh Government's latest household projections for Wales should form the starting point for assessing the LDP housing requirement. The LDP therefore accommodated the level of growth indicated by the 2008-based projections.
- 2.3.2 The 2008-based population projections estimated that Monmouthshire's population would increase from 88,862 to 91,923 between 2011 and 2021, an increase of 3.4%. The corresponding household projections indicated a need for an additional 3,969 households to meet this growth. Vacancy rates, estimated to be around 4% in Monmouthshire, and household composition were also taken into account which indicated a need for an additional 4,100 dwellings over the Plan period. The chosen level of housing provision in the LDP of 4,500 dwellings takes into account this additional need whilst also making provision for a small allowance (10 dwellings per year) to be met in that part of Monmouthshire included in the Brecon Beacons National Park, together with an additional requirement for the period 2006-2011.

### **Revised Population Projections**

- 2.3.3 Since LDP adoption, the Welsh Government has released new population and household projections, both in 2011 based on the outcome of the 2011 Census and in 2014 based on the Mid-Year Estimates. The key changes for Monmouthshire are as follows and are shown in Figure 1:
- The 2011 based population projections suggest a higher starting point for the population but a much lower level of population growth over the Plan period than previously anticipated, from 91,508 in 2011 to 92,338 in 2021, an increase of 0.9%.
  - The 2014 based population projections again indicate a higher starting point for the population and a lower level of growth than the 2008-based projections but a higher level of growth than the 2011 projections, from 91,508 in 2011 to 93,341 in 2021, a 2.0% increase over the Plan period.

**Figure 1: Comparison of Welsh Government’s 2008, 2011 and 2014 based Population Projections and Mid-Year Estimates for Monmouthshire**



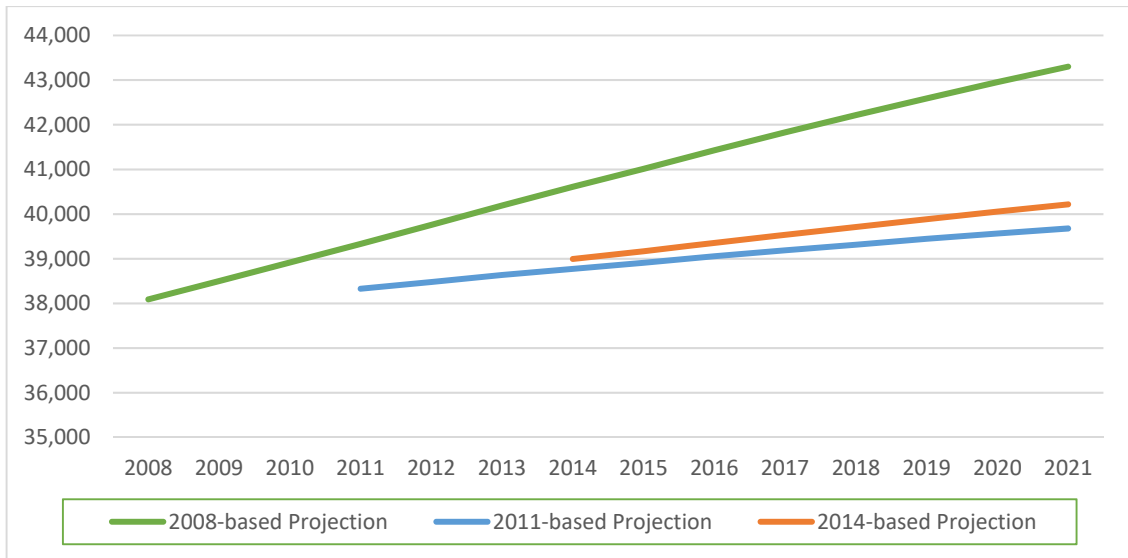
2.3.4 These lower levels of population growth are in contrast to the 2008-based population projections which the LDP used as the starting point for its growth strategy.

### Revised Household Projections

2.3.5 Corresponding household projections have also been released by the Welsh Government based on the 2011 census and the corresponding 2011 and 2014 population projections. The key changes for Monmouthshire are as follows and are shown in Figure 2:

- The 2011 based projections estimate that the number of households will increase from 38,327 to 39,678 between 2011 and 2021, an increase of 3.5% compared to a 10.1% increase in the 2008-based projections. Based on this, the LDP would have made provision for around 1,800 dwellings over the Plan period (with a 4% vacancy rate, a small allowance for the Brecon Beacons National Park and an additional requirement for the period 2006-2011 taken into account).
- The 2014 based projections estimate that the number of households will increase from 38,994 to 40,218 between 2014 and 2021, an increase of 3.1%. Taking the 2011 38,327 figure as the start point, the LDP would have made provision for around 2,400 dwellings over the Plan period (with a 4% vacancy rate, a small allowance for the Brecon Beacons National Park and an additional requirement for the period 2006-2011 taken into account).
- Clearly, the projected increase in households are at significantly lower levels than those used to establish the LDP requirement. This is due to the fact that households have not formed at the rate anticipated in the 2008 projections. This is a result of a combination of factors including affordability, pent up demand, supply issues and access to mortgages.

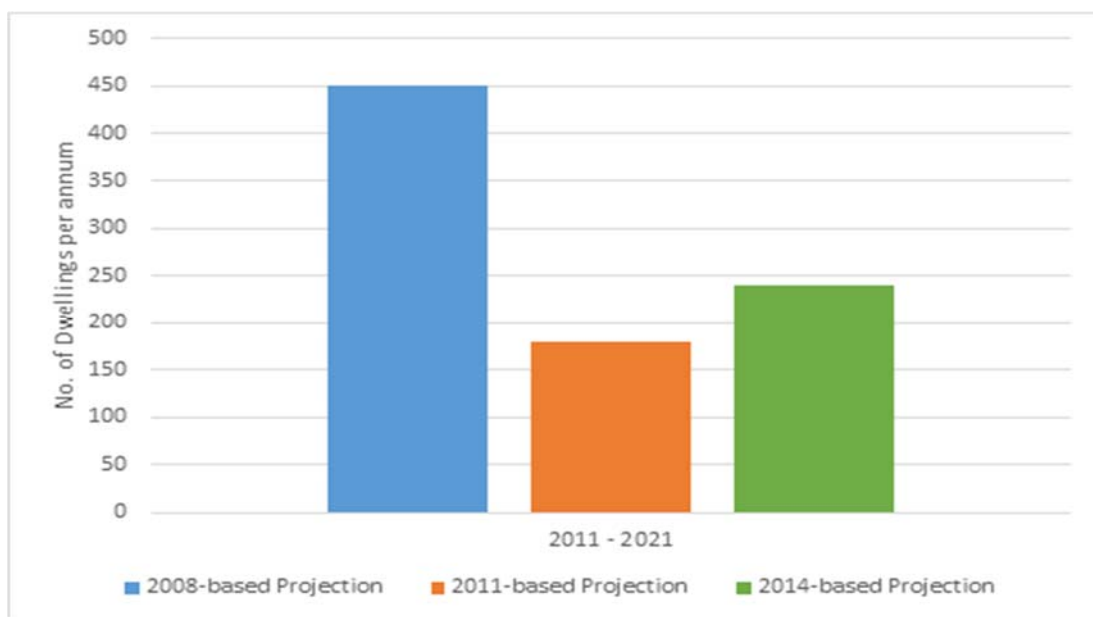
**Figure 2: Comparison of Welsh Government’s 2008, 2011 and 2014 based Household Projections for Monmouthshire**



**Dwelling Requirements**

2.3.6 The LDP’s current housing requirement, based on the 2008-based projections, at 450 dwellings per annum, is significantly higher than the 180 and 240 dwellings per annum that would be required by the 2011 and 2014 based projections respectively, as depicted in Figure 3. It is therefore deemed appropriate to reconsider the LDP Strategy’s level of housing growth as part of the preparation of a revised LDP.

**Figure 3: Annual Dwelling Requirement 2011 – 2021 based on the Welsh Government’s 2008, 2011 and 2014 based Household Projections for Monmouthshire**



### **Draft Review Report Consultation Findings**

As set out in Table 1, Appendix 2, the majority of consultation respondents agree that the main issues that should be considered in a full review of the LDP have been identified, noting that key policy indicators relating to housing provision have been considered with clear references to dwelling completions, affordable housing completions, housing land supply and delivery of strategic housing sites. Of those respondents who did not agree, some suggested that further consideration should be given to the impacts associated with the removal of the Severn Bridge Tolls. Others suggested that further consideration and explanation should be given to population and household projections. These matters will be addressed as part of the LDP revision process.

## 3.0 What Potential Changes are required to the LDP?

### 3.1 Review of LDP Vision, Issues and Objectives

#### LDP Vision

3.1.1 The LDP Vision was developed from public participation exercises carried out in the summer of 2008. The main part of the Vision was subsequently adopted as the Vision for the Monmouthshire Community Strategy 2008-12. It states that:

#### By 2021 Monmouthshire will be a place where:

- (1) **People live in more inclusive, cohesive, prosperous and vibrant communities, both urban and rural, where there is better access to local services, facilities and employment opportunities.**
- (2) **The distinctive character of its built heritage, countryside and environmental assets has been protected and enhanced.**
- (3) **People enjoy more sustainable lifestyles that give them opportunities for healthy activity, reduced reliance on the private motor car and minimised impact on the global environment.**

3.1.2 In April 2013 the Monmouthshire Community Strategy was replaced by a Single Integrated Plan 2013-17 (SIP). The SIP had a Vision of **Sustainable and Resilient Communities**. This Vision was to be achieved through three key themes: **Nobody is Left Behind; People are Confident, Capable and Involved; and Our County Thrives**.

3.1.3 Although the LDP was prepared in the context of the Community Strategy, the SIP addressed similar issues and priorities, including affordable housing, business and enterprise, accessibility and environmental protection/ enhancement. It was accepted during the LDP Examination (which took place in the summer of 2013, after the publication of the SIP) that the LDP was consistent with the SIP and met the relevant 'soundness' test. Clearly the LDP Vision was consistent with the SIP Vision as it went into fuller detail on how to achieve 'Sustainable and Resilient Communities'.

3.1.4 The SIP, in turn, is being replaced by a Local Well-being Plan (LWBP), which is to be finalised in Spring, 2018. The LWBP is a requirement of the Well-Being of Future Generations Act (2015). As noted in Section 2.2, the Act places a well-being duty on public bodies, including local authorities, to carry out sustainable development and to improve the economic, social, environmental and cultural well-being of their area by contributing to the achievement of the seven well-being goals: (1) A globally responsible Wales; (2) A prosperous Wales; (3) A resilient Wales; (4) A healthier Wales; (5) A more equal Wales; (6) A Wales of cohesive communities; and (7) A Wales of vibrant culture and thriving Welsh language.



3.1.5 Planning Policy Wales (para 2.1.7, Edition 9, November 2016) states that the LWBP ‘should provide the overarching strategic framework for all the other plans and strategies for the local authority, including the LDP’. The LWBP is being prepared by the Monmouthshire Public Services Board (PSB). The four statutory members of the PSB are the Local Authority, Local Health Board, Fire and Rescue Authority and Natural Resources Wales; other organisations are also invited. As part of its responsibility the PSB has produced a well-being assessment which assesses the state of economic, social, environmental and cultural well-being in Monmouthshire. The next stage is the preparation of the LWBP itself, which will set out the PSB’s local well-being objectives and the steps it proposes to take to meet them.

3.1.6 The PSB Draft LWBP has recently been subject to consultation. The draft objectives are indicated in the table below:

<b>Purpose</b>	<b>Building Sustainable and Resilient Communities</b>	
Our aspiration is to:	<ul style="list-style-type: none"> <li>➤ Reduce inequalities between communities and within communities.</li> <li>➤ Support and protect vulnerable people.</li> <li>➤ Realise the benefits that the natural environment has to offer.</li> </ul>	
Our Well-being Objectives are:	<b>People / Citizens</b>	<b>Place / Communities</b>
	<ul style="list-style-type: none"> <li>➤ Provide children and young people with the best possible start in life</li> <li>➤ Respond to the challenges associated with demographic change</li> </ul>	<ul style="list-style-type: none"> <li>➤ Protect and enhance the resilience of our natural environment whilst mitigating and adapting to the impact of climate change</li> <li>➤ Develop opportunities for communities and businesses to be part of an economically thriving and well-connected county.</li> </ul>

3.1.7 It can be seen that the overall purpose of the LWBP is the same as the Vision set out in the SIP. The elements of the LDP Vision reproduced in paragraph 3.1.1 above set out how the LDP, with its spatial emphasis, can contribute to meeting this overall goal of ‘Building Sustainable and Resilient Communities’. While there might be scope for some ‘tweaking’ of its wording, it seems unlikely, therefore, that any incompatibility will arise between the existing LDP Vision and the overall purpose of the LWBP.

3.1.8 Additional lines were added to the LDP Vision on the recommendation of the Council’s sustainability consultants in order to give it a spatial context and reflect the distinctive geography of Monmouthshire. It was considered appropriate to conceptualise the local planning authority area as having three broad categories of settlement:

- Monmouthshire’s historic market towns of Abergavenny, Chepstow and Monmouth.
- The newer ‘Severnside’ or M4 corridor group of settlements of Caldicot/Portskewett, Magor/Undy, Rogiet and Sudbrook.

- The rural area, containing the small town of Usk and larger villages of Raglan and Penperlleni but mainly consisting of a large number of small villages.

3.1.9 The second part of the LDP Vision, therefore, set out the Council’s aspirations for these groups of settlements and a spatial strategy was developed accordingly. If Plan revision results in substantial changes the spatial strategy then it will be necessary to revisit the spatial elements of the LDP Vision.

### **LDP Issues and Objectives**

3.1.10 The LDP Vision is supported by sixteen LDP Objectives. These are grouped according to the five main themes of the Wales Spatial Plan (WSP): Building Sustainable Communities, Promoting a Sustainable Economy, Valuing our Environment, Achieving Sustainable Accessibility and Respecting Distinctiveness. The WSP now carries limited weight as little attention has been given to it in recent years and it is due to be replaced by the National Development Framework. Nevertheless, this means of organising and structuring the LDP Objectives and subsequent planning policies that follow is still a valid approach as it highlights how the key purpose of the LWBP – ‘Building Sustainable and Resilient Communities’ – can be supported by the LDP.

3.1.11 The WSP themes were also used to group the Key Issues that had to be addressed in the LDP, thereby enabling the Objectives to be related to the Key Issues. The Local Well-being Assessment carried out by the PSB, as required by the Well-Being of Future Generations Act (2015), did not provide any evidence that the key spatial issues facing the County have changed to any significant extent. There is no pressing need, therefore, to amend the LDP Objectives. Should the LDP Vision require any significant revision then it is likely that the LDP Objectives would also have to be modified.

3.1.12 The following matrix shows how the LDP Objectives contribute to multiple well-being goals:

LDP Objectives	Well-being Goals						
	Prosperous Wales	Resilient Wales	Healthier Wales	More equal Wales	Wales of cohesive communities	Wales of vibrant culture and thriving Welsh Language	Globally responsible Wales
1. Sustainable Communities							
2. Maintain Main Centres							
3. Rural Communities							
4. Housing							
5. Access to recreation.							
6. Infrastructure							
7. Economy							
8. Natural Heritage							
9. Natural Resources							
10. Efficient Land Use							
11. Carbon Reduction							
12. Flood Risk							
13. Waste and Minerals							
14. Sustainable Transport							
15. Built Environment							
16. Sustainable Design							

3.1.13 This indicates that all the LDP Objectives make a significant contribution to meeting the well-being goals. As with the LDP Vision, there may be a case for some ‘tweaking’ to more specifically address the LWBP objectives. Overall, however, there is no fundamental conflict with purpose and objectives of the LWBP. Should any changes be made to the Plan, these would have to be devised in accordance with the well-being goals.

#### Draft Review Report Consultation Findings

As set out in Table 2, Appendix 2, the vast majority of consultation respondents agree that the existing LDP vision, issues and objectives remain relevant for a revised Plan, with some acknowledging the alignment with the seven goals of the Well-Being of Future Generations Act. Some respondents noted that since the adoption of the LDP there have been a number of important contextual changes at a national, regional and local level that will need to be considered in the vision, issue and objectives of the revised Plan, including the abolition of the Severn Bridge Tolls. These matters will be addressed as part of the LDP revision process.

## 3.2 Review of LDP Strategy

### Spatial Distribution of Housing

- 3.2.1 The spatial strategy in the adopted LDP was informed by an extensive consultation process. The strategy aims to focus the majority of residential development in the County's main towns (Abergavenny, Chepstow and Monmouth), with a smaller amount of new housing development provided within the Severnside area and the Rural Secondary Settlements where there is the best access to services and transport. The strategy also directs some development toward the County's main villages in order to meet local affordable housing need. In determining the spatial distribution of growth the existing supply of development was taken into account.

**Table 1: Spatial Distribution of Housing Growth – Proposed and Achieved**

	Proposed Spatial Distribution of Housing Growth in the LDP (%)	Spatial Distribution of Housing Growth Achieved (%) <sup>5</sup>
<b>Main Towns</b>	41	50
<b>Severnside Settlements</b>	33	27
<b>Rural Secondary Settlements</b>	10	12
<b>Rural</b>	16	11

- 3.2.2 The LDP is now nearly two thirds of the way through the Plan period and the above table indicates that the spatial delivery of housing generally aligns with the spatial distribution of growth identified in the adopted LDP. The proportion of housing growth achieved in Severnside is lower than that proposed in the LDP as two allocated strategic sites in this area (Crick Road, Portskewett and Vinegar Hill, Undy) have not yet progressed. The Annual Monitoring Reports have concluded that there are no concerns with the implementation of the spatial strategy. However, the latest AMR recognises that windfall sites have accounted for a significant proportion of completions within the main towns, albeit that this is still in line with the spatial strategy of the Plan. Therefore, with regard to the spatial strategy it would appear that in general LDP policies are functioning effectively.

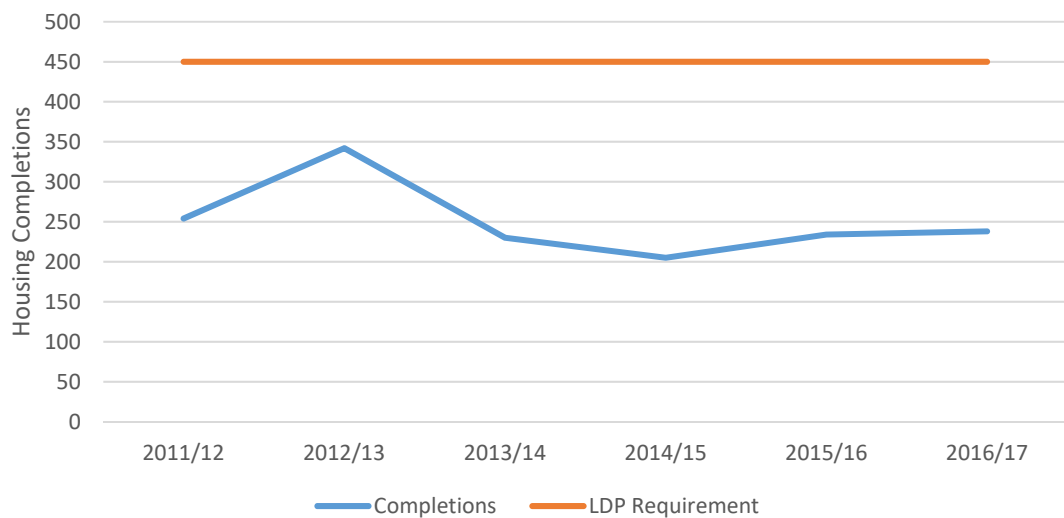
### Level of Housing Growth

- 3.2.3 The chosen level of housing provision in the LDP is 4,500 dwellings over the Plan period 2011-2021. This accommodates the level of growth indicated by the 2008-based Welsh Government Household projections, which as detailed in Section 2.3, projected an increase for the County of 3,969 households between 2011-21 (or about 4,100 dwellings when a 4% vacancy rate is factored in), with a small allowance (10 dwellings per year) to be met in that part of Monmouthshire included in the Brecon Beacons National Park, together with an additional requirement for the period 2006-2011.

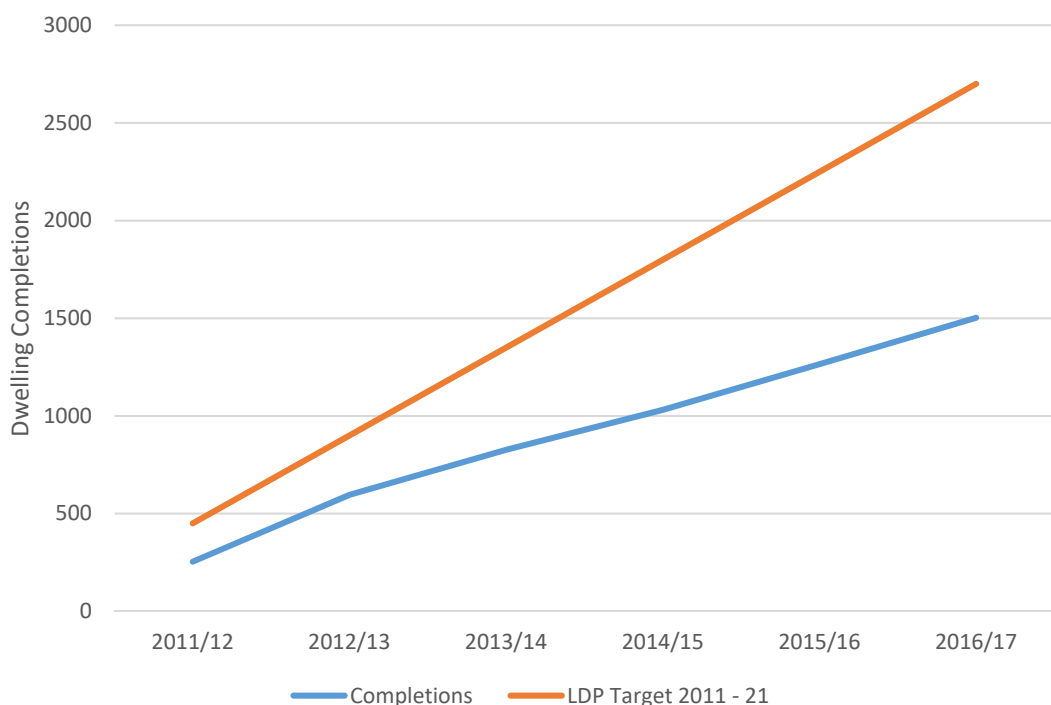
<sup>5</sup> Based on commitments (i.e. sites with extant planning permission for residential use) at 29/11/2017 and residential completions 01/04/2011-31/03/2017.

3.2.4 Over the 6 year period between 2011 and 2017 a total of 1,503 new dwellings were built in Monmouthshire which is well below the target of 2,700 for this period. As indicated in Figure 4, annual housing completions have been below the LDP dwelling requirement every year since the start date of the Plan. Consequently, in order to meet the LDP target of 4,500 new dwellings over the lifetime of the Plan, nearly 750 new dwellings per annum would need to be delivered over the next 4 years. This level of housing delivery is considered to be unrealistic, and as such the housing delivery element of the LDP's strategy is unlikely to be achieved by 2021. The cumulative completions recorded over this period compared with the LDP target is shown in Figure 5.

**Figure 4: Housing Completions in Monmouthshire 2011 - 2017**



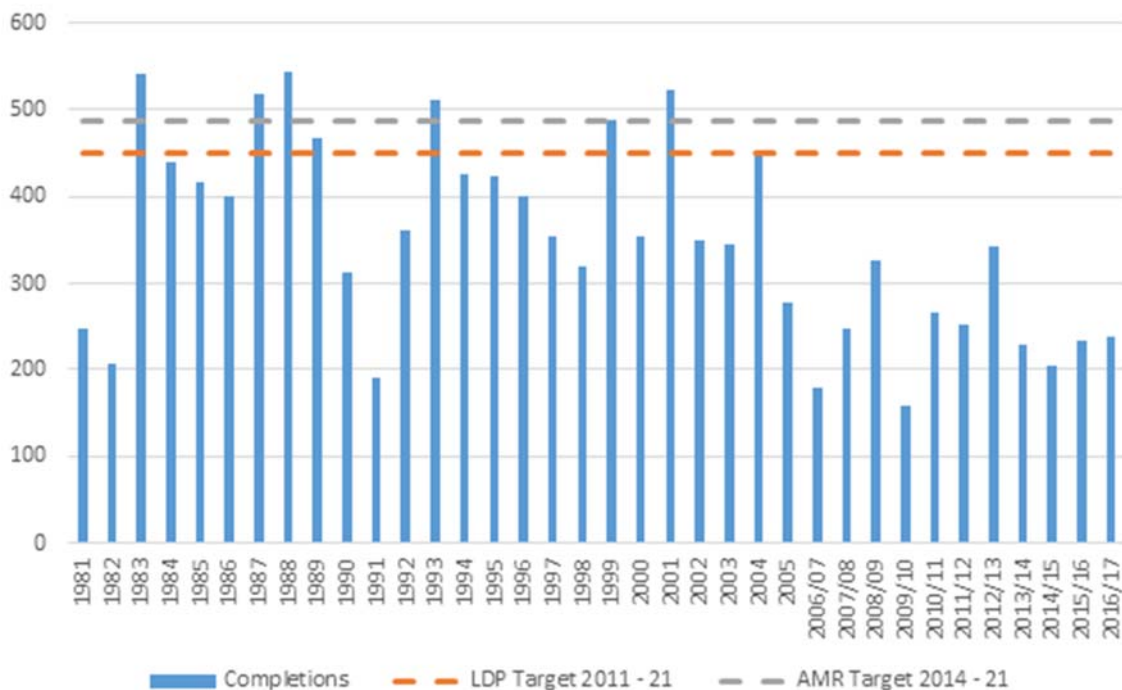
**Figure 5: Cumulative Housing Completions compared with LDP Target 2011 - 2017**



## Housing Delivery since LDP Adoption

3.2.5 As the LDP was adopted on 27 February 2014, in order to achieve the 450 per annum dwelling target over the Plan period (2011-2021), the AMR target is set at 488 per annum 2014-2021. Whilst the level of housing growth in the Plan is intended to be aspirational, it is evident from the Figure 6 that this level of annual growth was always going to be a challenging target, with this average build rate only exceeded some seven times over the past 35 years, with patterns of build rate following economic trends rather than land use plan coverage.

**Figure 6: Dwelling Completions in Monmouthshire 1981 - 2017**



3.2.6 A total of 667 dwellings completions have been recorded over the three years since the Plan's adoption, an average of 222 dwellings per annum, which is significantly less than the identified AMR target of 488 dwellings per annum. Based on the AMR target a total of 1,464 dwellings should have been completed which, in view of completions achieved, indicates a significant shortfall of 797 dwelling completions between the LDP adoption and 31 March 2017.

3.2.7 In addition to the 667 dwellings completed since LDP adoption, a further 836 completions were recorded in the first 3 years of the Plan period. This equates to a total of 1,503 dwelling completions in Monmouthshire to date, representing around a third of the housing requirement of 4,500 dwellings. This results in an average annual build rate of 250 dwellings per annum and with only 4 years of the Plan period left, the annual build rate would need to be in the region of some 750 dwellings to meet the housing target. It is therefore evident that the LDP's housing requirement is very unlikely to be met by the end of the Plan period.

- 3.2.8 The failure to deliver the levels of housing growth set out in the Plan is due to a variety of factors, one of which is the speed at which sites allocated in the Plan are coming forward. Of the seven strategic sites in the Plan only three have full permission and, of these, only one has recorded any completions to date. In terms of the remainder of the strategic sites two have received outline permission. As the strategic sites account for nearly 45% of the housing target of the Plan and are central to the provision of the Plan's proposed level of both general and affordable housing, their delivery is a crucial element in the delivery of the housing strategy. Whilst there is no evidence to suggest that the strategic sites are not deliverable or that their allocation needs to be reviewed, the slower than anticipated delivery rate of these sites confirms the need for additional site allocations through the LDP revision. It is, however, acknowledged that there is an overreliance on strategic sites and an associated lack of flexibility in the adopted LDP. The current status of strategic sites is provided in Table 4 - Delivery of Allocated Residential Sites - at Appendix 1.
- 3.2.9 Many factors impacting on the delivery of housing sites are independent of the planning system such as the wider economy and housing market. This includes the economic recession which has had a significant impact on the development sector. It is clear from Figure 6 that housing delivery is at a significantly lower level in the County since the onset of the recession in 2008. Whilst the recession has officially ended and the national economy is once again experiencing some growth, housing delivery in Monmouthshire remains at a lower level than previously experienced. Site viability is also a major factor impacting on site deliverability and viability assessments slow down the determination of planning applications. Delayed site delivery clearly affects the amount of general market and affordable housing being delivered through the planning system.
- 3.2.10 In response to the consultation on the Draft Review Report, a small number of representors sought to challenge these comments regarding the impact of the wider economy and housing market with reference to Newport. Newport has a 5 year housing land supply and has seen the delivery of a record 911 units per annum over the two years since LDP adoption. This comparison raises a number of relevant factors affecting housing delivery and LDP housing delivery and illustrates the complexities involved. At the time of Newport's LDP adoption in 2015, the vast majority of its housing allocations already had planning permission. Many sites were carried forward from the previous UDP, and some planning applications dated back to 2006/2007 (such as MonBank Sidings and Glan Llyn, which approved some 4600 dwellings). Other sites benefitted from significant Welsh Government investment (such as Loftus Garden Village and the 100+ City centre apartments delivered via £15m VVP funding). Other sites in the west of the City (Panasonic site, Alcan site) were delivered quickly to take advantage of the lack of housing sites in Cardiff due to delays with Cardiff's LDP. In contrast, Cardiff's LDP is heavily reliant on large strategic sites with a long lead-in time, and despite only adopting its LDP in 2016 it already has less than a five year housing land supply, albeit that this is expected to recover with time subject to the capacity of the housebuilding industry to deliver.

3.2.11 While there is currently sufficient land allocated in the LDP and land with planning permission to achieve a 5 year housing land supply, the slower than anticipated rate at which such land is coming forward is resulting in land being pushed outside of the 5 year supply. This is detailed further in paragraphs 3.2.15-3.2.19.

### **Affordable Housing Delivery since LDP Adoption**

3.2.12 A significant issue for Monmouthshire is the fact that house prices are high in relation to earnings. The LDP recognises the pressing need for affordable housing in the County in both urban and rural areas and as such made provision for the delivery of some 960 affordable homes over the Plan period. This is to be achieved by providing 35% affordable housing on new sites in the Main Towns and Rural Secondary Settlements, 25% on new sites in Severnside settlements and 20% on large site windfalls and the commitments which had achieved planning permission under the UDP. As such the delivery of the Plan's affordable housing target is very dependent on the progress of the strategic sites and achieving the required percentage on these sites. Another key area of the Plan's housing strategy is the provision of affordable housing in rural areas to meet local needs. To this end, sites for up to 15 dwellings are allocated in some of the County's main villages, with 60% of the proposed dwellings to be affordable.

3.2.13 Affordable dwelling completions are significantly lower than the identified LDP target (96 per annum) with a total of 127 affordable dwelling completions recorded over the three years since the Plan's adoption. Based on the LDP target of 96 affordable houses per annum, a total of 288 affordable dwellings should have been completed which, in view of completions achieved, results in a shortfall of 161 affordable dwelling completions between 2014-2017.

3.2.14 In addition to the 127 affordable dwelling completions recorded since LDP adoption, a further 163 completions were recorded in the first three years of the Plan period (total of 290 completions 2011-2017). This equates to an average annual build rate of 48 affordable dwellings per annum and with only 4 years of the Plan period left the annual build rate would need to be in the region of some 168 affordable dwellings to meet the affordable housing target. It is clear therefore that even if progress is made on the delivery of the strategic sites during the remainder of the Plan period, the LDP's affordable housing requirement is unlikely to be met.

3.2.15 With regard to delivery of the main village 60% affordable housing sites, of the 19 sites allocated only one site has been delivered to date with one other site currently under construction. Of the remainder, 3 sites have planning permission and a further 3 have been the subject of pre-application discussion, as indicated in Table 4 of Appendix 1. As detailed below, delivery of these sites will be given further consideration as part of the revision process and the reasons for lack of progress investigated, including the impact of unrealistic landowner expectations. Investigation into the reasons behind non-delivery may lead to the de-allocation of some sites in the revised Plan.

### **5 Year Housing Land Supply**



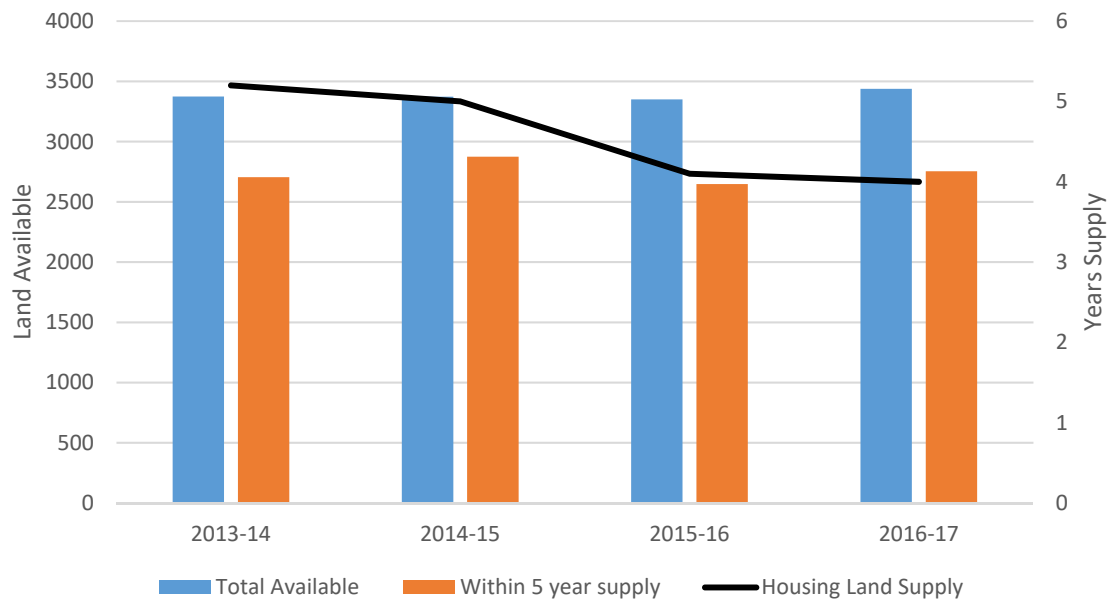
3.2.16 Planning Policy Wales (PPW) Edition 9 (November 2016) at paragraph 9.2.3, states that local planning authorities must ensure that sufficient land is genuinely available or will become available to provide a 5 year supply of land for housing. Monmouthshire has not achieved a 5 year housing land supply for the past two consecutive years, with the housing land supply currently standing at 4.0 years, as detailed in the table below.

**Table 2: Monmouthshire Housing Land Supply April 2011 - April 2017**

	<b>No. Years Supply - Residual Method</b>	<b>No. Years Supply - Past Build Rates</b>
<b>2011/12</b>	-	4.4
<b>2012/13</b>	-	3.6
<b>2013/14</b>	5.2	9.9
<b>2014/15</b>	5.0	11.5
<b>2015/16</b>	4.1	10.8
<b>2016/17</b>	4.0	11.0

3.2.17 Despite the housing land supply currently standing at 4.0 years, Monmouthshire has sufficient land available in terms of allocated sites and current planning permissions to achieve a 5 year supply of housing land. However, as detailed above, the slower than anticipated progress in housing allocations being delivered has resulted in around 680 of these dwellings being outside the current 5 year land supply in the 2017 Joint Housing Land Availability Study, as shown in Figure 7.

**Figure 7: Availability of Housing Land & Housing Land Supply 2013-2017 (based on the JHLAS)**



3.2.18 Another contributing factor to the inability to evidence a 5 year supply of housing land is that while there is sufficient land allocated/with permission to achieve a 5 year supply, current Welsh Government guidance set out in TAN1: Joint Housing Land Availability Studies (2015) requires LPAs to base housing land availability calculations solely on the use of the residual method. Under previous TAN1 guidance past build rates could also be used to calculate housing land supply and evidence whether land for development is available. The residual method focuses on the remaining number of houses to be delivered in the remaining Plan period, whereas the past completions method reflects to a greater extent the realities of what is being delivered on the ground by the development industry. As indicated in Table 2, if past build rates were used the County would currently have an 11 year supply of housing land.

3.2.19 Importantly, this illustrates that the housing land supply issue is not a simple case of the LDP not delivering, it is a complex combination of rules around how land supply is measured and external economic factors affecting house building and the housing market.

3.2.20 Where a local planning authority cannot evidence a 5 year supply of housing land, TAN1 states that considerable weight should be given to this when dealing with planning applications for housing sites that are not allocated in a Plan but would otherwise comply with both local and national planning policies. Accordingly, Monmouthshire has taken a pragmatic approach to determining two recent residential development applications which, whilst not allocations within the Plan, are otherwise acceptable in planning terms. This pragmatic approach has made a positive contribution to the County’s supply of land. However, as stated above whilst there is sufficient land available for residential development the reasons that the land is not coming forward as quickly as anticipated is not solely a case of the planning system not delivering.

## Reconsideration of the LDP Strategy

- 3.2.21 The inability to meet the adopted LDP's housing requirement and the resulting failure to maintain a 5 year housing land supply indicates that either additional housing sites are required or the level of housing growth required by the LDP's strategy will need to be reconsidered as part of a revision of the LDP. In addition, all undelivered housing allocations will need to be re-assessed to ensure that they remain viable and deliverable. This could result in existing housing allocations being removed from the LDP and new sites allocated. The LDP's reliance on strategic sites suggests that the spatial distribution of housing growth will need to be reconsidered.
- 3.2.22 In addition to considering the current proposed level of housing growth, the revision of the Plan will also need to consider the implications of an extended Plan period. The current Plan runs to 2021, any revised Plan is likely to extend to 2033<sup>6</sup>. Extending the Plan period will result in a revised dwelling need and a requirement for new sites for both market and affordable dwellings. It will need to take account of the latest population and household projections and a revised Local Housing Market Assessment, as well as other updates to the evidence base. Consideration will also need to be given to the policy aspirations linked to the Cardiff Capital Region City Deal and Future Monmouthshire, together wider contextual matters, including the opportunities associated with abolition of the Severn Bridge Tolls.
- 3.2.23 These updates and issues will need to be thoroughly considered and addressed as part of the Plan revision process which cumulatively could result in a significant change to the Plan's strategy. In view of this, it is considered that the spatial strategy will need to be comprehensively reconsidered as part of the LDP revision process.

### Draft Review Report Consultation Findings

The majority of consultation respondents suggest that there is a need to reconsider the LDP strategy as part of the Plan revision process. As set out in Table 3, Appendix 2, while some respondents considered that the current strategy is functioning effectively, the majority cited concerns with the current strategy and suggested that the revision process provides the opportunity to reassess the strategy having full regard to the matters identified above.

---

<sup>6</sup> The revised Plan period should cover a period of 15 years with a start date of 2018. This allows four years for Plan preparation and ensures the required ten year period from the date of Plan adoption. This would result in a Plan running from 2018 to 2033, which aligns with Torfaen's proposals and enables a consistent (and where appropriate, joint) evidence base with collaborative working.

### 3.3 Review of LDP Policies

3.3.1 The LDP policies have been reviewed having regard to the following:

- Findings of the three LDP Annual Monitoring Reports;
- Significant contextual changes that have occurred since the Plan's adoption, including changes in national policy and legislation; and
- Internal consultation with development management officers and other specialist MCC officers, including housing, green infrastructure, heritage and economic development officers. Topic based officer working groups were established to discuss policy implementation, with consideration given to how policies are functioning/being implemented. Consultation also took place with a number of organisations involved in the development of the Main Village 60/40 affordable housing sites (Policy SAH11), including registered social landlords (RSLs), the Rural Housing Enabler and private developers.

3.3.2 A summary of the policy review assessment is set out in Tables 1-5, Appendix 1. This gives an overview of whether a policy/allocation is functioning effectively, whether any amendments are likely to be needed and whether any policies should be removed as part of the Plan revision process. The policy assessment undertaken to date is not considered to be definitive and further consideration will be given to the need to revise the Plan's policies as part of the revision process.

3.3.3 The key policies that are considered likely to require amendment based on the policy review assessment are discussed in more detail below.

#### **Housing and Site Allocations**

*[Policies S1, S2, S3, SAH1-SAH11]*

3.3.4 As detailed above, to date the adopted LDP has not delivered the level of housing growth identified in the Plan which has resulted in a shortfall in the housing land supply. As part of the revision process consideration will, therefore, need to be given to the appropriate level of housing growth for the County over an extended Plan period. In addition, consideration will be given to adopted spatial strategy to determine whether it remains appropriate over extended Plan period, having regard to wider policy aspirations associated with Cardiff Capital Region and Future Monmouthshire. Accordingly, it is anticipated that policies S1 (Spatial Distribution of New Housing Provision) and S2 (Housing Provision) will need to be amended to reflect this.

3.3.5 It is also anticipated that the Plan's residential site allocation policies will require amendment as part of the revision process. Undelivered housing allocations will need to be re-assessed to ensure that they remain viable and deliverable which could result in existing allocations being removed from the revised Plan. It will also be necessary to allocate additional deliverable and viable sites to meet the County's housing requirement over an extended Plan period.

## **Affordable Housing**

*[Policies S4, H7, SAH11]*

- 3.3.6 As highlighted above, affordable dwelling completions are significantly lower than the identified LDP target (96 per annum) with a total of 127 affordable dwelling completions recorded over the three years since the Plan's adoption. A significant reason for the failure to achieve the Plan's affordable housing targets is the slow delivery of the LDP strategic site allocations. At the same time, viability issues have made it difficult to achieve the required proportions of affordable housing on those sites that have obtained planning permission to date. Policy S4 requires 35% affordable housing on new sites in the Main Towns and Rural Secondary Settlements and 25% on new sites in Severnside settlements. The permission for the allocated site at School Lane, Penperlleni, made provision for 35% affordable dwellings; the permission for Wonastow Road, Monmouth achieved 30% affordable; the permission for Coed Glas, Abergavenny included 33% affordable. Of two windfall sites allowed in Abergavenny, one (The Hill, Pen-y-Pound) achieved 27% plus an off-site financial contribution towards affordable housing and the other (Mulberry House, Pen-y-Pound) included 64% affordable. Conversely, the permission for the allocation at Sudbrook Paper Mill could only achieve 9.4% affordable, this site being subject to considerable abnormal remediation costs. With regard to the permission for the Fairfield Mabey allocation, there are considerable abnormal costs affecting the site and agreement has been reached with the developers for 1.5 acres of serviced and remediated land to be provided to the Council at a discounted price. Two further allocated strategic sites have gained outline planning permission. Of these, the permission for Rockfield Farm, Undy will include 25% affordable, achieving the target, while that for Deri Farm will achieve 20% affordable, viability at this latter site being affected by the expense of undergrounding overhead electricity pylons. Planning permissions have also been granted, subject to Section 106 agreements, for departure applications at Rockfield Road, Monmouth, and Grove Farm, Llanfoist. These both make provision for the 35% policy compliant affordable housing requirement.
- 3.3.7 There has, therefore, been a wide range of percentages of affordable housing achieved under Policy S4 in planning permissions granted since the adoption of the LDP. A significant number of these permissions, however, have achieved the required percentages and there is no evidence to suggest that the policy targets are unrealistic in general terms. Where a lesser proportion has been permitted this has followed considerable negotiation and the submission of detailed viability evidence which has been independently assessed by the District Valuation Service. In this respect, Policy S4 specifically states that the affordable housing requirements should be subject to appropriate viability assessment. This can be carried out on a site by site basis and it does not appear that a reduction in the targets set out in the policy is required. Having said that, however, there is a clear need to ensure that the policy requirements are based on up to date information on development costs and values and appropriate

viability testing will be carried out as part of the evidence gathering for any revised LDP.

- 3.3.8 Another key aim of Policy S4 is the provision of affordable housing in rural areas to meet local needs. To this end sites for up to 15 dwellings are allocated in most of the County's main villages under Policy SAH11, with a minimum of 60% of the proposed dwellings to be affordable. Of the 19 sites allocated only one site has been delivered to date with one other site currently under construction. Three sites have obtained planning permission, although two of these are subject to a Section 106 agreement. Progress has been made with a number of other sites but planning applications have not yet been forthcoming. Discussions with developers and the Rural Housing Enabler have indicated a number of issues preventing sites coming forward, including unrealistic land owner expectations on land values, high infrastructure costs and allocated sites being too small to achieve effective layouts. Given the limited progress in delivering the sites allocated in Policy SAH11 there is a clear need to consider revisions to the policy and/or how it is implemented through the Affordable Housing SPG, although within a general context that the primary aim of the policy is the provision of affordable housing for local people living in the rural parts of the County.
- 3.3.9 While Policy S4 is generally operating successfully, experience of implementing the policy and discussions with Development Management officers have indicated a number of areas where the wording of the policy would benefit from greater clarity and precision, albeit that attempts have been made to address some of the points of concern through the Affordable Housing SPG. Such issues include: the percentage affordable housing required on infill sites in Main Villages (i.e. sites not allocated under Policy SAH11); the percentage affordable housing required on departure sites in the open countryside; the difficulty in providing affordable housing in conversion schemes; and the lack of relevance of the part of the policy relating to Minor Villages.
- 3.3.10 Policy S4 also requires that developments below the thresholds for providing affordable housing on site make a financial contribution towards the provision of affordable housing in the local planning authority area. Such an approach is encouraged in PPW (paragraph 9.2.17) and is considered to be a useful and justified means of providing resources to assist in meeting affordable housing needs in the County. It is recognised, however, that care needs to be taken not to prevent housing development coming forward and the implementation of the policy is being kept under review. It is considered unlikely that Policy S4 itself would need revision in this respect. This would be more a matter of policy implementation that could be dealt with in Affordable Housing SPG.

### **Gypsy Travellers**

*[Policy H8]*

- 3.3.11 The adopted LDP was informed by the Gypsy and Traveller Accommodation Needs and Sites Study (2009) which found there to be very little need for gypsy and traveller sites in Monmouthshire. However, given that a planning application had been submitted to

the Authority for 4 pitches, the study concluded that this represented a need. The site in question was subsequently granted planning permission on appeal for a revised scheme comprising of 2 caravans and 2 amenity blocks. Given that no other specific new need was identified, the Study concluded that no other new provision would need to be found through Plan allocations. Accordingly, given that the identified need had been adequately provided for it was determined that there was no need to allocate an additional site in the LDP and that any future applications for gypsy and traveller sites would be assessed against Policy H8 - Gypsy Traveller and Travelling Showpeople Sites.

- 3.3.12 Subsequent to the adoption of the LDP, the Housing (Wales) Act 2014 introduced a statutory requirement for local authorities to assess the accommodation needs of Gypsy and Travellers, together with a duty to make provision for sites where the assessment identifies need. Accordingly, the Council prepared a Gypsy Traveller Accommodation Assessment (GTAA) which was submitted to the Welsh Minister in February 2016 and subsequently agreed by the Welsh Minister in December 2016. The aim of the assessment is to provide data which will identify Gypsy and Traveller pitch needs separately from wider residential demand and aspiration. A key finding of the assessment is that there is an estimated unmet need for eight pitches to 2021, based on overcrowding, unauthorised occupation and the likelihood of cultural aversion to conventional housing.
- 3.3.13 In view of this, the Council's intention is to make provision for an appropriate site(s) to meet identified unmet need by working proactively with Gypsy and Traveller households to establish their preference for site provision (private or Council). The findings of the GTAA process suggest that there is an aspiration within much of the Gypsy Traveller community for private site provision in Monmouthshire. Where necessary, the Council will work with and support Gypsy Traveller households to identify and develop suitable private sites to address the identified unmet need in accordance with the existing LDP policy framework. A recent appeal decision in Monmouthshire at Llangeview (October 2017) allowed the provision of a private site for 7 pitches. This decision was made to meet some of the identified unmet need. A recent appeal decision held that the Llancayo site does not comply with Policy H8. Many of the occupiers of this site took part in the GTAA and form part of the Council's identified need. Any revised Plan will need to consider need for the duration of the Plan period.
- 3.3.14 If further private site(s) cannot be achieved there may be a need to identify a public gypsy/traveller site. The identification and provision of Gypsy Traveller site(s) to address any unmet need will be given further consideration in the LDP revision process.
- 3.3.15 The GTAA also found that while there is no need for a transit site, due to the low number of unauthorised encampments in the County, there is a need for a stopping site. In terms of transit sites and stopping sites, it is considered that these would best be considered on a regional basis, requiring collaboration with neighbouring local authorities through any LDP revision / SDP process.

3.3.16 In terms of the existing policy framework, Policy H8 - Gypsy Traveller and Travelling Showpeople Sites - appears to be functioning effectively. The policy review did, however, suggest the need to revise parts of the policy to align with the provisions of WAG Circular 30/2007 - Planning for Gypsy and Traveller Caravan Sites. This will be given further consideration in the LDP revision process.

### **Open Space**

*[Policies CRF2, DES2 Designations]*

3.3.17 The existing recreation/open space policies contained in the LDP were informed by the Monmouthshire Open Space Study, December 2008. This assessed the quantity, quality and accessibility of outdoor recreation and public open space provision within the County's main settlements and identified villages, including all land designated as Areas of Amenity Importance under Policy DES2. The study identified deficiencies in the quantity and quality of existing provision in relation to the proposed standards in the LDP. A qualitative assessment of existing provision was also undertaken. The study set out in detail the levels of provision for each of the County's named settlements.

3.3.18 It is considered that in general the Plan's recreation and open space policies are functioning effectively in safeguarding existing recreation facilities and public open space and in securing provision of new facilities in connection with new residential development in accordance with the adopted standards. However, as part of the revision process further consideration needs to be given to the spaces currently designated as Areas of Amenity Importance under Policy DES2. A full survey of all open space within the boundaries of the main settlements and villages is currently being undertaken. All outdoor space designated as DES2 should fulfil the criteria set out in Policy DES2 and any areas, in full or in part, which do not fulfil the criteria will be considered for de-designation. Areas which fulfil the criteria but which are not currently designated will be considered for designation as Areas of Amenity Open Space through the LDP revision process.

3.3.19 Whilst there have been no contextual changes to national planning policy or TAN16: Sport, Recreation and Open Space (2009) since adoption of the Plan, Fields in Trust produced new guidance in 2017, 'Guidance for Outdoor Sport and Play: Beyond the Six Acre Standard.' This guidance, while retaining the same headline rates of provision as the original "Six Acre Standard", draws out new recommendations for accessibility, for flexible application of standards and the minimum dimensions of formal outdoor space. The revision of the guidelines also introduces benchmarking for informal open space not involving organised sport and play and includes parks and gardens and natural and semi-natural habitats. The amendments to the guidance do not result in a requirement to make modifications to current LDP standards as the TAN promotes evidence based locally generated standards. However, the revised recommended benchmark guidelines for both formal and informal outdoor space will be taken into account in the LDP revision process. The Council is also moving away from an approach



to recreation and open space provision based on strict compliance with predetermined standards. This is in accordance with LDP Green Infrastructure policies that encourage the multifunctional use of open space.

## **Retail**

### *[Policy S6]*

- 3.3.20 The existing LDP was informed by the Monmouthshire Retail and Leisure Study, April 2010, which evidenced the need to focus new retail and commercial developments in the identified retail hierarchy to assist in sustaining and enhancing the County's main towns /local centres and building sustainable communities. It also set out the future retail needs for the County's main towns and the local centres of Magor and Usk and, where appropriate, identified potential development opportunities for future retail and commercial development within the centres. Overall, the study found limited need for further retail development in the County over the Plan period and it was subsequently determined that such limited floorspace requirements could be met on existing sites in the County's Central Shopping Areas. Accordingly, there was no need to allocate additional sites for retail provision in the Plan.
- 3.3.21 An updated Retail Expenditure Forecasts Study (March 2017) has been prepared to inform the LDP revision. This provides an update of the retail expenditure forecasts contained within the Monmouthshire Retail & Leisure Study 2010 which informed the existing LDP. The purpose of the Update, alongside the 2015 Retail Background Paper published by the Council in February 2016, is to provide comprehensive information on the current performance of the Monmouthshire towns as retail centres, and to provide an up-to-date assessment of retail expenditure capacity within the County. This updated study will inform the Plan revision.
- 3.3.22 The review of LDP retail policies found that in general the policies are functioning effectively in enabling appropriate retail development in the County. However, as part of the revision process further consideration will be given to the retail hierarchy to take account of any changes in town, local and neighbourhood centres and/or updated retail requirements over the revised Plan period. Similarly, consideration will also be given to the appropriateness of the existing boundaries of the centres' primary shopping frontages and central shopping areas, taking account of any changes to their role/function.
- 3.3.23 A number of contextual changes to national planning policy have occurred since the preparation of the Plan. Welsh Government published revised versions of Chapter 10 of PPW and TAN4 (Retail and Commercial Development) in November 2016. The documents have been updated to reflect the Welsh Government's revised national planning policy for retailing and commercial development. The main areas of change include revised objectives for retail planning policy, stronger emphasis on the need for retail policies to be framed by a retail strategy in LDPs (complemented by masterplans

and place plans to assist in the delivery of the strategy), a requirement for LDPs to set out a locally derived hierarchy of centres and revised policies for dealing with new uses/centres undergoing change and a consistent approach to terminology. However, the policy requirement to consider retail and commercial centres first for retail and complementary uses remains, as do the requirements for retail need, sequential tests and impact assessments, where appropriate. The amendments to national policy do not result in a requirement to make modifications to current LDP policies, however, the revised guidance will be taken into account in the LDP revision process.

### **Planning Obligations**

*[Policy S7]*

- 3.3.24 LDP Strategic Policy S7 – Infrastructure Provision – seeks to ensure that new development is accompanied by an appropriate level of infrastructure to assist in providing for sustainable communities. The policy is being delivered through the development management process. Contributions are being secured through the use of planning obligations, as set out in Section 106 of the Town and Country Planning Act 1990. Planning obligations seek 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.
- 3.3.25 The Council resolved on 27 June 2013 to commence preparatory work on CIL with a view to adopting CIL as soon as practicable following adoption of the LDP. This would have provided an alternative means of providing the necessary infrastructure to support development in the LDP, although the view was taken that the LDP strategic sites could be delivered without the need for CIL as each site had specific infrastructure requirements that could be dealt with through a standard Section 106 legal agreement.
- 3.3.26 Following a consultation on a CIL Preliminary Draft Charging Schedule (DCS) in 2015, a consultation on the DCS took place in April/May 2016. The next stage would have been to submit the DCS for Examination by an independent inspector. However, a CIL Review report (the Peace Review) published with the UK Government’s Housing White Paper in November 2016 was recommending a number of substantial changes to CIL that were to be considered in the UK Government’s Autumn Budget 2017. The Chancellor subsequently made his Autumn Budget statement, in which the announced proposed changes to CIL were relatively minor with no mention made of the significant amendments recommended in the Peace Review. In addition, the Wales Act 2017 has devolved CIL to the Welsh Government and it is anticipated that the powers will be coming across in April 2018. There is, therefore, considerable uncertainty over the future of the measure. A decision has been taken, therefore, to delay any further work on CIL for the time being.

- 3.3.27 In the meantime, policy guidance is being prepared to set out an approach to guide negotiations for Section 106 planning obligations between Monmouthshire County Council and applicants proposing new residential developments. It had been intended to produce full Supplementary Planning Guidance (SPG) on Planning Obligations to accompany the adopted LDP. As CIL would have largely replaced Section 106 Obligations in the funding of infrastructure provision and because of the complicated relationship between Section 106 and CIL, however, the preparation of SPG was deferred while work on implementing CIL was ongoing.
- 3.3.28 Having said that, the current policy is working successfully and contributions are being received (subject to viability considerations) to ameliorate the impacts of new development and help provide necessary infrastructure such as recreation and open space, community facilities, sustainable transport and education. A LDP Revision, however, will need to consider the most effective method of providing infrastructure to support development in the LDP, carry out appropriate infrastructure planning accordingly and take account of any changes made to CIL legislation.

### **Employment**

*[Policies S9, SAE1 and SAE2]*

- 3.3.29 The LDP policy review found that in general the Plan's employment policies are functioning effectively in enabling appropriate industrial and business development across the County and no concerns have been raised by officers in respect of the current employment policy framework. However, as part of the revision process consideration will be given to the employment strategy to take account of the industrial and business allocations that have been developed since LDP adoption. Consideration will also need to be given to the 'economies of the future' and their locational, sites and premises requirements. The Council's long term economic priorities and aspirations linked to the Cardiff Capital Region City Deal and Future Monmouthshire will also need to be considered through the revision process.
- 3.3.30 The Welsh Government produced a new TAN relating to Economic Development in February 2014. TAN 23 provides additional clarity relating to development management decisions and preparation of LDPs in relation to economic development. The TAN places greater emphasis on collaborative working with neighbouring authorities in terms of preparing regional evidence bases to inform regional working, including in relation to economic development strategies and the identification of strategic employment sites. Welsh Government also produced practice guidance in relation to building an economic development evidence base to support a LDP (August 2015). Chapter 7 of PPW was also updated, noting a need to provide specific targets on land provision for employment use classes B1, B2 and B8, indicating net change in land/floorspace for offices and industry/warehousing separately. The current LDP employment evidence base does not incorporate the full requirements set out in

revised national planning policy guidance and will therefore need to be updated accordingly.

- 3.3.31 More recently, regional collaboration has been undertaken as part of the South East Wales Strategic Planning Group (SEWSPG) Employment Task and Finish Group. A common methodology has been produced for monitoring employment land and property provision on a regional basis. This methodology will be utilised in LDP revision to provide a comprehensive evidence base, allowing for a consistent analysis of cross-boundary employment land matters across the region.

*Employment Land – Take up*

- 3.3.32 The LDP allocated a total of 50.12ha of Identified Industrial and Business Sites (SAE1) to ensure that there is a sufficient supply of employment land to meet the needs of the County. The 2016-2017 AMR identified a total take-up of 9.36ha of employment land on SAE1 sites since LDP adoption (to 31 March 2017). Of this development, 3.1ha relates to non-B uses.
- 3.3.33 There has been less take-up in relation to the Plan's protected employment sites (SAE2), with a total of 1.86ha has completed since LDP adoption. A small 0.21ha speculative site in Abergavenny has also been constructed and implemented for B1 light industrial starter units, highlighting the need for small industrial units across the County. As this site is located outside the development boundary on an unallocated site, it will be considered for inclusion as a protected employment site in LDP revision. Of note, 3.72ha of employment land (B1/B8 use) at the Identified Mixed Use Site at Wonastow Road, Monmouth has been completed since the latest AMR (2016-2017).

*Employment Land – Quantity and Spatial distribution*

- 3.3.34 The LDP monitoring indicator relating to employment land supply/development notes sufficient employment land is required to be maintained to meet the identified take up rate of 1.9ha per annum. Since adoption sufficient employment land has been maintained and while take up has been limited, there has been some progress across the County. There is currently 40.76ha of remaining land available across the Identified Industrial and Business Sites (SAE1), the majority of which is located in Magor (31.06ha/76%). Assuming a take up rate of 1.9ha per annum, the LDP currently contains sufficient industrial and business sites to the year 2038. In addition to this, 8.58ha is currently available on the Identified Mixed Use sites and 1.12ha on Protected Employment Sites (SAE2) Sites.
- 3.3.35 In accordance with TAN23, consideration must be given as to whether existing longstanding undeveloped identified industrial and business allocations have a reasonable prospect of being delivered for such purpose. In addition, there was some concern expressed at the LDP examination about the quantity and spatial distribution of identified industrial and business sites and internal discussions with the Council's Business and Enterprise team have indicated that it is likely that these issues will need

to be addressed further in any LDP revision, providing the opportunity to determine whether any undeveloped sites should be de-allocated or re-allocated for a different use and/or if, and where, any new sites are required. As noted in paragraph 3.3.29, consideration will also need to be given to growing economies of the future and the Council's long term economic aspirations linked to the Cardiff Capital Region City Deal and Future Monmouthshire.

### **Tourism**

*[Policies S11, T1-T2]*

- 3.3.36 A review of the LDP's tourism policy framework commenced in 2015 following concerns raised by the Council's Economy and Development Select Committee as to the effectiveness of the Plan's tourism policy framework in enabling/delivering tourism related development, and the extent to which it is supporting sustainable forms of tourism accommodation, including 'glamping' facilities. The review into this matter subsequently found that the Plan's policy framework is generally supportive of sustainable forms of tourism accommodation, including glamping. It also determined that the preparation of SPG would be beneficial in order to provide clarification for officers, Members and customers on the interpretation /implementation of the existing policy framework in relation to sustainable tourism accommodation proposals. Accordingly, the Planning Policy Team prepared SPG in relation to sustainable tourism accommodation which was adopted in November 2017.
- 3.3.37 Reflecting this, the latest AMR reported that the Council approved proposals for a total of 24 tourism facilities (1 April 2016 – 31 March 2017), all of which related to tourist accommodation ranging from holiday lets to glamping accommodation. This demonstrates that the new Sustainable Tourism Accommodation SPG has helped clarify the Council's general support for this important sector of Monmouthshire's economy.
- 3.3.38 While the existing policy framework is working well in enabling sustainable tourism accommodation in the County, the policy review has also identified the need for some amendments to policies T1 (Touring Caravan and Tented Camping Sites) and T2 (Visitor Accommodation outside Settlements) to further improve their clarity. This will be given further consideration as part of the LDP revision process.

### **Renewable Energy**

*[Policies S12, SD1]*

- 3.3.39 The LDP policy review found that the renewable energy policies are functioning effectively in respect of the provision of renewable energy, with a total of 16 schemes incorporating on-site renewable energy permitted since the LDP's adoption (excluding permitted development). However, significant contextual changes have occurred in relation to renewable and low carbon energy since LDP adoption which will need to be considered/addressed through the LDP revision process.

- 3.3.40 Welsh Government produced a revised version of the Renewable Energy Toolkit for Planners in September 2015. The update includes an additional section relating to how local planning authorities assess the potential for solar farm developments. The revised toolkit provides a methodology to assist in the production of Renewable Energy Assessments (REAs) and additional advice on how to translate the results of the REAs into the LDP evidence base and resulting policies. Local authorities are expected to undertake a proactive approach to all forms of renewable and low carbon energy generation.
- 3.3.41 The Monmouthshire Renewable Energy and Energy Efficiency Study (May 2010), and, the subsequent Addendum (February 2012) informed the policies set out within the LDP. The addendum was specifically produced to bring the LDP evidence base in line with the 2010 Welsh Government Renewable Energy Toolkit. The revised LDP will, nevertheless, need to consider the revised Toolkit and address the additional requirements set out within it.
- 3.3.42 Following the publication of the revised Toolkit, Welsh Government<sup>7</sup> has provided further emphasis that Local Planning Authorities should utilise their REAs to inform policies, areas of search and allocations for local authority scale renewable energy schemes (5MW – 25MW), or, other low carbon technologies. Welsh Government advise that the LDP consultation process should provide communities with the opportunity to identify suitable locations for renewable energy developments, meaning that such development can be guided to the most appropriate locations. Accordingly, the Plan’s renewable energy evidence base will need to be updated and areas of search for local authority scale renewable energy explored through the LDP revision process.

## **Waste**

### *[Policy S14]*

- 3.3.43 The LDP Waste policies were prepared in the context of the South East Wales Regional Waste Plan (RWP) – First Review 2008. This set out land requirements for new waste management facilities, which were taken on board in LDP Strategic Policy S14 – Waste. Site Allocation Policy SAW1 subsequently identified sites that had potential for the location of in-building waste management facilities – class B2 industrial sites and existing waste management sites. The total amount of land identified amounted to 35.4 hectares, well in excess of the RWP requirement of 2.2 hectares to 5.6 hectares, depending on the technology utilised. The first three AMRs have indicated that the land available for potential waste management sites has now reduced to 26.26 hectares, again well in excess of the RWP requirement. The monitoring report trigger for further investigation is that the amount of B2 employment land falls below 5.6 hectares, which clearly has not been met.
- 3.3.44 RWPs, however, no longer have effect. A re-write of national planning policy on waste was needed to reflect the new waste policy context introduced through the EU

---

<sup>7</sup> Dear Chief Planning Officer Letter (10 December 2015)

Directive on Waste (2008/98/EC), the Waste Strategy for Wales, 'Towards Zero Waste, June 2010 and the underpinning suite of waste sector plans, in particular the Collections, Infrastructure and Markets Sector (CIMS) Plan, June 2012. PPW, therefore, was amended in February 2014 (Edition 6) and a revised TAN21 issued in the same month. The revised PPW and TAN21 no longer require the preparation of RWPs. The general approach of the CIMS Plan has been to move away from land-take based calculations to an approach where the need for waste management facilities is expressed by future capacity in tonnes. As stated in Welsh Government Policy Clarification Letter CL-01-12, technology development has led to the potential for smaller, more dispersed facilities to be developed (more flexible, able to take advantage of niche opportunities). It has also led to the possibility of larger facilities being developed to reflect economies of scale and reduce expenditure by businesses and local authorities on the management of their residual waste. The end result of this is that it is now more difficult to ascribe a value to an 'average facility' – and as such, area-based land-take calculations have become less applicable.

3.3.45 The CIMS Plan describes the waste management framework considered to provide the best solutions to meet environmental, social and economic needs in Wales to 2050. Waste assessments contained within the CIMS Plan do not have to be repeated by local planning authorities at a regional or local level. However, monitoring needs to be carried out through voluntary co-operation at a regional level to inform decision making in future LDPs and in dealing with planning applications for waste. The regional monitoring work has resulted in the first Waste Planning Monitoring Report (WPMR) for South East Wales (April 2016). This concluded that the regional position was:

- There is no further need for landfill capacity within the South East region.
- Any proposals for further residual waste treatment should be carefully assessed to ensure that the facility would not result in overprovision.

3.3.46 It appears, therefore, that there is no current need for residual waste facilities in Monmouthshire, although PPW (edition 6, paragraph 12.6.2) requires that the identification of suitable locations for sustainable waste management facilities should be considered as part of LDP preparation. PPW (paragraph 12.6.1) also requires that development plans should demonstrate how national waste policy, and in particular the CIMS Plan, along with any updated position adopted in the waste planning monitoring reports and any other form of waste management priorities relevant to its local area have been taken into account.

3.3.47 Given the findings of the LDP AMRs and the South East Wales WPMR it is considered that there is no pressing need to revise the LDP strategic and site allocation waste policies. Any LDP Revision, however, should reconsider these policies to take account of current government guidance and the change of approach to waste planning away from area-based land-take calculations.

## **Minerals**

### *[Policy S15]*

3.3.48 The LDP Minerals policies were prepared in the context of the Regional Technical Statement (RTS) of the South Wales Regional Aggregates Working Party (SWRAWP) (October 2008). This has subsequently been replaced by the RTS 1st Review (August, 2014), which concluded that Monmouthshire was required to make future provision for land-won primary aggregates within its Local Development Plan on the basis of the following annualised apportionments:

- Land-won sand & gravel provision: Nil
- Crushed rock aggregates provision: 0.12 million tonnes per year until the end of the Plan period and for 10 years thereafter.

3.3.49 These figures are based on the assumption that average annual demand for land-won primary aggregates within the area, over the period to 2036, will be comparable to the average annual sales over the baseline period used in the 1st Review of the RTS (i.e. 2001 to 2010). This method for assessing demand was different to that used in the original RTS and made little sense from a Monmouthshire point of view as the sales figures were based on production from Livox Quarry, which has since ceased operation following the refusal of an application to renew its permission, and the Council made representations on the 1st Review accordingly. There are, however, reserves at Ifton Quarry, Rogiet that amount to 11 million tonnes. While it has not been worked for some time, Ifton Quarry has an existing planning permission that expires in 2045. This permission enables Monmouthshire to maintain its crushed rock land bank and meet its regional obligations. No further allocations for crushed rock extraction are needed, therefore, a situation that is unchanged from the 2008 RTS under which the LDP Minerals policies were prepared. There is no pressing need, therefore, to revise Policy S15. Any LDP Revision, however, should reconsider this policy to take account of changes in government guidance and any updated regional position.

3.3.50 Since the preparation of the LDP, Minerals Planning Policy Wales (2001) has been incorporated into PPW as Chapter 14 - Minerals. No changes to existing national policy have been made as a result of this integration exercise.

## **Transport**

### *[Policies S16, MV10]*

3.3.51 The review of the Plan's transport policies indicates that there are currently no concerns with their effectiveness / implementation, as detailed in Tables 1-2 Appendix 1. However, a number of contextual changes have occurred since the Plan's adoption, as detailed below, which will need to be taken into account in the LDP revision process.



3.3.52 In accordance with Welsh Government Local Transport Plan (LTP) guidance (May 2014)<sup>8</sup>, Monmouthshire County Council prepared a new LTP in January 2015 which was approved by Welsh Government in May 2015. The LTP replaces the 2010 South East Wales Regional Transport Plan (RTP) which informed the preparation of the adopted LDP. As directed by the guidance, the LTP is an update of schemes and priorities identified in the RTP. The transport schemes identified in LDP Policy MV10 (Transport Routes and Schemes) were carried forward to the Monmouthshire LTP and include a range of highway, public transport and walking/cycling schemes. However, the LTP identifies a number of additional transport schemes in Monmouthshire not specifically identified in Policy MV10 which are programmed for delivery over the 2015-2020 period, including the Magor and Undy new walkway rail station. Further consideration will be given to the policy/land use implications of the transport schemes identified in the LTP, as well as any updates to the LTP, as part of the LDP revision process.

3.3.53 Consideration will also be given to the policy/land use implications of the Cardiff Capital City Region South East Wales Metro proposals in the Plan revision process. The Metro proposals seek to improve transport connectivity across the region which is integral to achieving wider economic and social outcomes for South East Wales.

3.3.54 The Active Travel (Wales) Act 2013 requires local authorities in Wales to produce active travel maps and deliver year on year improvements in active travel routes and facilities. The LTP identifies Active Travel Network schemes for each of the County's towns which propose the development and implementation of active travel plans for these areas. In terms of implications for the revised LDP, any new or amended proposals for active travel routes and facilities, especially for walking and cycling, may be considered for safeguarding through the LDP revision process where they are within a programme, supported by funding and likely to be delivered in the Plan period.

### **Supplementary Planning Guidance (SPG)**

3.3.55 Following the Plan's adoption a number of supplementary planning guidance (SPG) documents have been prepared to support existing LDP policies. These are:

- Green Infrastructure, April 2015
- Conversion of Agricultural Buildings Design Guide SPG April, 2015
- LDP Policies H5 & H6 Replacement Dwellings in the Open Countryside and Extension of Rural Dwellings SPG, April 2015
- Affordable Housing SPG, March 2016
- Renewable Energy and Energy Efficiency SPG, March 2016
- Primary Shopping Frontages Supplementary Planning Guidance, April 2016
- Sustainable Tourism Accommodation SPG, November 2017

---

<sup>8</sup> Guidance to Local Transport Authorities – Local Transport Plan 2015, Welsh Government, May 2014

- Rural Conversions to Residential or Tourism Use, November 2017

3.3.56 Generally, it is anticipated that the SPGs will be carried forward to support any revised LDP (albeit recognising that modifications to certain SPGs may be required as a result of LDP revision). Accordingly, it may be necessary to make some minor amendments to any revised Plan to ensure relevant SPGs are properly cross referenced.

#### **Proposals Map and Constraints Map**

3.3.57 The LDP **Proposals Map** contains a number of allocations and designations which will be subject to amendment through the LDP revision process. In light of the Plan review, it is anticipated that there will be amendments to the housing site allocations, identified industrial and business site allocations, settlement development boundaries, primary shopping frontage boundaries, central shopping area boundaries, neighbourhood centres boundaries and designated areas of amenity importance.

3.3.58 The LDP **Constraints Map** contains a number of designations which are determined by mechanisms that sit outside of the LDP process. Examples include areas of flood risk, Scheduled Ancient Monuments and sites of special scientific interest. Since LDP adoption changes have been made to some of these designations which, whilst depicted on the LDP interactive map on the Council's website, are not available on the printed version of the map. A Constraints Map, unlike the Proposals Map, is not a statutory requirement and is not part of the LDP (Section 2.4, page 16, LDP Manual, Edition 2, 2015). Accordingly, as part of the revision process consideration will be given as to whether a printed version of the map should still be made available or whether this should be made available solely as an on-line resource which is capable of regular up-date.

#### **Draft Review Report Consultation Findings**

Numerous consultation respondents have suggested amendments to certain LDP policies, as identified in Table 4, Appendix 2. These policy comments will be considered as part of the LDP revision process.

## 4.0 What are the Future LDP Evidence Base Requirements?

- 4.1 The contextual and evidence base changes that have occurred since the Plan's adoption in 2014, including updates to WG population and household projections (as detailed in Section 2), indicate that the Plan will need to be revised to reflect such changes. Other elements of the LDP evidence base will also need to be updated as part of the Plan preparation process, as detailed below.

### Evidence Base Studies

- 4.2 As part of the revision process, the Plan period will need to be extended to ensure that the revised LDP has an operational life of at least 10 years following adoption<sup>9</sup>. Given the likely timescale for preparing a revised Plan (i.e. 4 years if following the full revision procedure) it is anticipated that the revised Plan period will run to 2033<sup>10</sup>. Accordingly, updates to the evidence base will be required to reflect the extended Plan period which, at this stage, are envisaged to include:

- Needs assessments in relation to population, housing, employment, retail
- Additional land allocations to meet the new Plan-period's requirements
- Affordable Housing Viability Assessment
- Local Housing Market Assessment
- Sustainable settlement hierarchy
- Urban capacity study
- Employment Land Review
- Amenity open space survey
- Settlement boundary review
- Renewable Energy Assessment
- Infrastructure Plan

This is not a definitive list and additional evidence base update requirements may emerge as Plan revision progresses.

### Sustainability Appraisal and Habitats Regulations Assessment

- 4.3 A **Sustainability Appraisal (SA)** incorporating Strategic Environmental Assessment (SEA) is a statutory requirement of LDP preparation. These are tools to ensure that policies in the LDP reflect sustainable development principles and take into account the significant effects of the Plan on the environment. SA, incorporating SEA, was an iterative process throughout the preparation of the adopted LDP and is reflected in the Plan's proposals and policies.

---

<sup>9</sup> Local Development Plan Manual, Edition 2, August 2015 (paragraph 10.2.2)

<sup>10</sup> The revised Plan period should cover a period of 15 years with a start date of 2018. This allows four years for Plan preparation and ensures the required ten year period from the date of Plan adoption. This would result in a Plan running from 2018 to 2033, which aligns with Torfaen's proposals and enables a consistent (and where appropriate, joint) evidence base with collaborative working.

- 4.4 Since the Plan's adoption, the LDP's SA objectives/ indicators have been monitored annually as part of the AMR process. This enables the Council to assess the extent to which the LDP is contributing to the achievement of sustainable development and to identify any concerns. Given the difficulties encountered in monitoring some of the SA indicators, it has been necessary to amend/delete a number of SA indicators since the Plan's adoption in order to improve the effectiveness of the SA monitoring process (as detailed in the AMRs).
- 4.5 In view of the changes that have occurred since the SA was originally undertaken to accompany the adopted LDP, it will be necessary to update the environmental baseline, plans, policies and programmes as part of the LDP revision process. The SA framework, including SA objectives, will also need to be reviewed to ensure this remains up-to-date and relevant.
- 4.6 The LDP was also subject to a **Habitats Regulations Assessment (HRA)**. This determines the likely significant effects of the Plan, either individually or in combination with the effects of other plans and projects, on European sites of nature conservation importance and if applicable, scopes what needs 'appropriate assessment' (AA) and how it will be undertaken. The HRA will need to be reviewed as part of the revision process.

#### **Evidence Base – Opportunities for Collaborative Working**

- 4.7 As part of this process, consideration will be given to opportunities to work collaboratively with neighbouring authorities on updating key areas of the evidence base. Joint work is currently being undertaken by SEWSPG/LDP Pathfinder Task and Finish Groups on developing a shared regional approach to key LDP evidence base studies, including retail, employment and sustainable settlement appraisals. It is anticipated that this work will inform the LDP preparation process. Further detail on the opportunities for joint working is provided in Section 5.

## 5.0 Joint LDPs / Joint Working

- 5.1 The Welsh Government's recent White Paper<sup>11</sup> sets out its commitment to reforming local government in Wales. The paper proposes regional working in many areas of local government, including land use planning. A Local Government Bill is expected to be introduced into the Assembly in 2018 to give effect to these proposals, including a mandate for Strategic Development Plans (SDP).
- 5.2 In addition, on 13th December, subsequent to the start of the consultation on the Monmouthshire LDP Draft Review Report, the Council received two letters from Lesley Griffiths, Welsh Government Cabinet Secretary whose portfolio includes planning. The first letter went to the Leader and Chief Executive of every Local Planning Authority in Wales and invited Councils to undertake a Strategic Development Plan (SDP) in their region. The second letter specifically invited Monmouthshire to undertake a Joint Local Development Plan with Newport, Torfaen and Blaenau Gwent Councils (letters are attached at Appendix 3). A 'positive' response to these letters was requested by 28th February 2018.
- 5.3 In view of the above, extensive discussions have taken place across the South East Wales region, including with neighbouring local planning authorities<sup>12</sup>, with regard to the options for progressing a SDP for the region and to the potential for preparing a joint Local Development on the footprint proposed for 'South East Wales – East'. An options appraisal has subsequently been prepared to comprehensively consider the options available to MCC in seeking to ensure full Plan coverage for the County and to avoid the risks associated with having no Plan coverage in January 2022. The Council's stance on the invitations set out in the Cabinet Secretary's letters to prepare a SDP and a Joint LDP for 'South East Wales – East' is considered below.

### **Strategic Development Plan**

- 5.4 The production of a Cardiff Capital Region SDP to provide a regional spatial planning framework for South East Wales is fully supported. The SDP would provide a proper regional spatial planning framework across the Cardiff Capital Region footprint and, as such, would ensure that cross-boundary issues are fully considered and addressed across the region.
- 5.5 As set out in the letter from the Leader of the Vale of Glamorgan, Councillor John Thomas and Councillors Andrew Morgan and David Poole, dated 6<sup>th</sup> February 2018, which states:

*“there was consensus amongst all 10 leaders in the Cardiff Capital Region in support of the principle of an SDP for the region. Whilst the decision to work towards an SDP is*

---

<sup>11</sup> WG White Paper Reforming Local Government: Resilient and Renewed, 31 January 2017

<sup>12</sup> Torfaen CBC, Blaenau Gwent CBC, Newport City Council

*a matter for each of the 10 councils, we are confident that this is a decision that can be taken quickly.”*

- 5.6 MCC’s Cabinet Leader for Enterprise will be seeking a Council resolution to be part of the CCR SDP in March 2018, at the same time as reporting the final Review Report to Council.

**Joint Local Development Plan – ‘South East Wales-East’**

- 5.7 There are significant concerns relating to the preparation of a Joint LDP on the large footprint proposed for the South East Wales – East area. Firstly, there are concerns with regard to the time and effort it would take to establish and run effective joint working arrangements (governance, culture, political working relationships, joint teams etc.) which would undoubtedly delay the preparation of revised Plans. It would be highly unlikely that a Joint Plan on the footprint proposed could be adopted by 2021. This would undermine the Welsh Government’s objective of ensuring full Plan coverage and would result in a policy vacuum for MCC with associated negative planning outcomes. It is essential that any revised Plan is progressed expediently given the ‘drop dead’ date of the current LDP (i.e. 2021). It is considered that a Joint Plan would prove too onerous and time consuming to meet this timescale. Whilst it is acknowledged that a Joint LDP could generate potential cost savings, there are fundamental concerns around how a Joint LDP would progress in light of the aforementioned arrangements that would need to be in place. Cost savings relating to shared evidence can be achieved without working on a Joint Plan. Delays associated with establishing joint working arrangements for a Joint LDP would also act as a distraction from preparing the SDP, which is the proper way of delivering strategic regional spatial planning.
- 5.8 The new provisions in the Planning (Wales) Act 2015 create an ‘expiry date’ for LDPs, beyond which they are no longer the development plan for the area. Consequently, the adopted Monmouthshire LDP legally “ceases to be a local development plan” on 31st December 2021. After this date, the Council will be at risk from development proposals without a statutory development plan framework to properly manage them, until such time as a replacement development plan is adopted. This calls into question the Council’s ability to ensure sustainable development and to secure S106 planning contributions towards essential infrastructure and affordable housing, without the necessary LDP policy hooks or supplementary planning guidance in place. As such, MCC cannot afford to risk the delays involved in establishing the governance, structure, team culture and accountability arrangements for a Joint LDP.
- 5.9 Given the agreement to proceed with a SDP, the proposed Joint LDPs provide an unnecessary sub-regional tier, achieving neither a proper City Region strategic approach nor a truly local plan that the communities value, engage with and take ownership of. Contrary to assertions made by WG officers, there is a distinct lack of outcome-focussed evidence to support the proposed Joint LDP groupings. It remains unclear how a Joint Plan would serve Monmouthshire’s communities better. The

rationale for the groupings appears to be entirely process-driven based on LDP expiry dates. As such it is difficult to see a logical planning justification for preparing a Joint LDP.

- 5.10 The proposed 'South East Wales – East' Joint LDP would result in a Plan covering some 400,000 people across an area exceeding 100,000 hectares. The proposed footprint comprises a very diverse area with vastly different demography, economies and physical characteristics ranging from Wales' youngest City, to historic market towns and significant rurality, to disadvantaged valleys communities. Population density<sup>13</sup> ranges from 7.85 people per square kilometre in Newport to 1.05 in Monmouthshire. The proportion of land area defined as 'built on' ranges from 25% in Newport to 3% in Monmouthshire<sup>14</sup>. Blaenau Gwent has the highest proportion (23.4%) of LSOAs ranked in the lowest 10% in Wales while Monmouthshire has the lowest proportion (0%)<sup>15</sup>. The proposed grouping does not withstand evidence-based scrutiny.
- 5.11 Monmouthshire has some very distinct challenges, including the fastest growing proportion of its population in the over 65 and over 85 age bands, with a declining younger population and a median age of 48 years. Directly linked with this challenge, Monmouthshire has the highest average house prices in Wales creating an affordability issue and a deficit of 20-40 year olds as well as increasing household sizes. If left unchecked this will result in imbalanced communities and socio-economic problems. While the overall principle of directing development to brownfield sites is accepted, we must take action to ensure the social and economic sustainability of our communities and the services they rely on. This directly relates to the Well-being agenda. A Monmouthshire LDP is the best mechanism for achieving this outcome in a timely manner.
- 5.12 Monmouthshire also has significantly distinctive characteristics to its neighbouring authorities. Monmouthshire is a predominantly rural county with associated wide ranging planning issues, including high quality landscape, AONB, rural affordable housing, sustainable tourism, rural conversions, historic market towns and a high number of listed buildings and conservation areas. Locally specific policies have been developed in the LDP to address these issues. It is unclear how a Joint Plan would more effectively address such issues/ lead to better planning outcomes.
- 5.13 It is fully acknowledged that the daily lives of Monmouthshire's residents are not prescribed by administrative boundaries, and that commuting patterns, retail expenditure, and some aspects of the housing market operate across our boundaries with our neighbours, both east and west. It is further recognised that changes such as the Metro and abolition of the Severn Bridge tolls will have implications for much of the Cardiff Capital Region, and that developments such as at Mamhilad in Torfaen and Glan Llyn in Newport have potential implications for parts of our County.

---

<sup>13</sup> 2016 population data

<sup>14</sup> Corine Landcover Inventory

<sup>15</sup> Welsh Index of Multiple Deprivation 2014

However, it is considered that such matters can be successfully addressed without a Joint LDP at this time, including via close working relationships/communication, and with a shared evidence base. Moreover, full consideration would be given to cross-boundary issues across the region through the SDP, rather than at the sub-regional footprint proposed.

- 5.14 Whilst it is accepted that the first round of LDPs could have been delivered more quickly and would have benefitted from better cross-boundary working, it is noted that the relevant regulations and LDP Manual to guide this process were both delayed initially and then revised during the process, interrupting progress. Avoiding such delays and changes going forward would be of considerable benefit. There has been a significant maturing of the approach to collaborative working since that first round of LDPs.
- 5.15 The benefits of working much closer with our neighbouring Councils is accepted and meetings have already been held at officer level to identify areas where we can work jointly to better manage resources, ensure a consistent evidence base, remove duplication and waste, share data, and utilise common methodologies. Significant work is already progressing via the South East Wales Strategic Planning Group (SEWSPG) to agree common methodologies for use across the Cardiff Capital Region. To this end, and in addition to the current SEWSPG collaboration, we will be proposing closer liaison/collaboration with those authorities who wish to review their LDP at the current time, including a shared evidence base for key topics. However, each Council will need to ultimately maintain control over timing and governance to responsibly manage the risk of no Plan coverage.

#### **Joint LDPs on a Smaller Footprint**

- 5.16 Consideration has also been given to the potential for preparing a Joint LDP on smaller footprints than those proposed in the Cabinet Secretary's letter i.e. Monmouthshire and Torfaen Joint LDP; Monmouthshire and Newport Joint LDP; Monmouthshire and Blaenau Gwent.

#### *Monmouthshire and Torfaen Joint LDP*

- 5.17 It is recognised that in terms of planning outcomes Monmouthshire has potential synergies with Torfaen in relation to Mamhilad and Cwmbran which would benefit from cross-boundary working. However, the issues identified with regard to the South-East Wales – East footprint in relation to the preparation of a Joint Plan would still be a concern. The likely lengthy timescales involved in setting up and effectively running the necessary joint working arrangements, even between two local authorities, would undoubtedly cause significant delays to the Plan preparation process. It would be highly improbable that a Joint LDP with Torfaen could be adopted



by 2021 which would undermine the agreed objective of full Plan coverage and would result in a policy vacuum for local authorities with associated negative planning outcomes. This is not a desirable position for either authority.

- 5.18 As stated above, effective cross boundary working can be achieved without a Joint LDP in place, through close working relationships/communication and with a shared evidence base. This would seem a more common sense approach in order to ensure that adopted Plans are in place by the time the current LDPs expire and to avoid the risks associated with a policy vacuum.

*Monmouthshire and Newport Joint LDP*

- 5.19 It is similarly recognised that undertaking a Joint with Newport could offer potential to address common issues, such as the abolition of the Severn Bridge tolls. However, respective Plan timescales are not in alignment. Newport's LDP runs to 2026 and also has a 5 year housing land supply, meaning that the LPA are not considering a review/revision of their Plan at present. A Joint Plan with Newport CC is not therefore considered to be a feasible option at this stage. In any event, as stated above, effective cross boundary working can be achieved without a Joint LDP in place. There would be opportunities for Newport to link with any collaborative work undertaken on the evidence base. Moreover, the issues identified above in relation to the lengthy timescales involved in setting up and effectively running the necessary joint working arrangements for a Joint Plan would be a substantial concern.

*Monmouthshire and Blaenau Gwent Joint LDP*

- 5.20 In terms of synergies/planning outcomes, Monmouthshire has little commonality with Blaenau Gwent (the authorities do not even share a boundary). The social, cultural and economic issues facing Monmouthshire are vastly different to those facing Blaenau Gwent as well as being geographically different. It is not clear how a Joint Plan would more effectively address such issues / result in better planning outcomes. In any event, as above, the concerns associated with the delays in setting up and running the joint working arrangements would remain.
- 5.21 In conclusion, it is considered that MCC has the capacity, capability and resilience to deliver its own replacement LDP, and doing so minimises the risk of having no Plan coverage in January 2022. Having completed a full review of our LDP, consulted on the draft Review Report, and carried out an options appraisal with regard to the proposals set out in in the Cabinet Secretary's letters, it is considered that the best way forward is to proceed with the Cardiff Capital Region SDP and for Monmouthshire to commence on its own replacement LDP, working collaboratively with appropriate neighbouring Councils where possible, for example on a joint evidence base and common methodologies.

### **Draft Review Report Consultation Findings**

A number of consultation respondents, whilst acknowledging the Cabinet Secretary's invitation to prepare a Joint LDP for 'South East Wales – East', consider that preparation of a Joint Plan with neighbouring authorities would not be efficient or appropriate at the present time as it would delay the provision of appropriate Plan-led controls to be in place to guide local development. It is considered that a SDP would provide the suitable regional tier of Plan and would allow for further collaborative working.

## 6.0 Conclusions: What Form of Plan Revision is Required?

- 6.1 A key outcome of the final Review Report is to make a conclusion on whether the LDP needs to be revised and, if so, the type of revision process to be followed. . This can either be a short form or full revision.
- 6.2 Based on the evidence contained in the Review Report, it is concluded that the LDP should be revised and that this should take the form of a full revision procedure. Key reasons for reaching this conclusion include:
- The inability to meet the adopted LDP’s housing requirement and the resulting failure to maintain a 5 year housing land supply indicates that the level of housing growth required by the Plan’s strategy will need to be reconsidered.
  - The need to assess reassess all undelivered housing allocations to determine whether they remain viable and deliverable which could result in existing allocations being removed from the LDP and new sites added. The LDP’s reliance on strategic sites suggests that the spatial distribution of housing growth will need to be reconsidered.
  - The extent of updates required to the evidence base for an extended Plan period, including updated needs and land requirements, could result in significant changes to the Plan.
  - Wider contextual matters that have occurred since the Plan’s adoption, including the Cardiff Capital Region City Deal and announcement to abolish the Severn Bridge Tolls need to be fully considered.
- 6.3 The potential cumulative changes required to the LDP as a consequence of these factors could result in a Plan that is distinctly different the one adopted. Accordingly, it is considered that the full revision procedure would be the most appropriate means of revising the LDP. Importantly, the full revision procedure would enable a comprehensive reconsideration of the Plan’s strategy, having regard to an extended Plan period and the wider context including the Cardiff Capital Region City Deal and Future Monmouthshire aspirations, together with the economic opportunities associated with the abolition of the Severn Bridge Tolls.
- 6.4 It is considered that a full revision of the Monmouthshire LDP on an individual basis is the most appropriate means of revising the Plan. This will enable the aforementioned issues to be fully considered/ addressed and importantly will ensure continued Plan coverage in the County, thereby avoiding the risks associated with any policy vacuum. As detailed in Section 5, it is considered that MCC has the capacity, capability and resilience to deliver its own replacement LDP and that the best way forward is to proceed with the Cardiff Capital Region SDP and for Monmouthshire to commence on its own LDP revision, working collaboratively with appropriate neighbouring Councils where possible, for example on a joint evidence base and common methodologies.

### **Draft Review Report Consultation Findings**

The majority of consultation respondents agree with the conclusion to revise the LDP using the full revision procedure<sup>16</sup> as set out in Table 5, Appendix 2. While some respondents considered that the a short form revision procedure would be a more appropriate means of revising the LDP, the majority considered that a full revision would ensure that all matters, as outlined above, are fully considered and addressed, taking account of an extended Plan period.

---

<sup>16</sup> 28 respondents considered that the LDP should be revised using the full revision procedure; 11 respondents considered that the LDP should be revised using the short form revision procedure.

## Appendix 1: Summary of LDP Policy Review

**Table 1: Review of Strategic Policies**

Strategic Policies		Commentary
S1	Spatial Distribution of New Housing Provision	Revise as necessary to reflect reconsideration of spatial strategy over extended plan period. Minor amendments likely to be required in response to Officer Working Group comments to provide clarity. Draft Review Report consultation comments on this policy noted (Table 4, Appendix 2 refers). These will be considered as part of the LDP revision process.
S2	Housing Provision	Revise level of spatial distribution of housing growth over extended plan period in relation to reconsideration of housing requirement and spatial strategy. Draft Review Report consultation comments on this policy noted (Table 4, Appendix 2 refers). These will be considered as part of the LDP revision process.
S3	Strategic Housing Sites	Revise in relation to reconsideration of housing requirement and spatial strategy, additional sites included to reflect strategy. Certain allocations have been delivered. Undelivered allocations will be reviewed and could be removed if considered unlikely to be delivered. Minor amendments may be required in response to Officer Working Group comments to provide clarity. Draft Review Report consultation comments on this policy noted (Table 4, Appendix 2 refers). These will be considered as part of the LDP revision process.
S4	Affordable Housing Provision	Revise as necessary to reflect reconsideration of strategy, updated viability evidence and affordable housing requirements. Some amendments required in response to comments from Officer Working Group, Registered Social Landlords and private developers. Adopted Affordable Housing SPG provides further clarity but will require updating accordingly. Draft Review Report consultation comments on this policy noted (Table 4, Appendix 2 refers). These will be considered as part of the LDP revision process.
S5	Community and Recreation Facilities	Functioning effectively.
S6	Retail Hierarchy	Functioning effectively. Revise as necessary to reflect any changes to identified Neighbourhood Centres.
S7	Infrastructure Provision	Functioning effectively. Amendments may be required to provide greater precision and clarity.
S8	Enterprise and Economy	Functioning effectively.
S9	Employment Sites Provision	Functioning effectively. Revise if necessary in relation to reconsideration of employment land review. Amendments may be required to reflect changes to national employment policy. Draft Review Report consultation comments on this policy noted (Table 4, Appendix 2 refers). These will be considered as part of the LDP revision process.

Strategic Policies		Commentary
S10	Rural Enterprise	Functioning effectively.
S11	Visitor Economy	Functioning effectively. SPG on Sustainable Tourism Accommodation has provided further clarity. Some minor amendments may be needed. Draft Review Report consultation comments on this policy noted (Table 4, Appendix 2 refers). These will be considered as part of the LDP revision process.
S12	Efficient Resource Use and Flood Risk	Functioning effectively. Amendments may be required to reflect changes to national renewable energy policy.
S13	Landscape, Green Infrastructure and the Natural Environment	Functioning effectively. Some minor amendments may be needed in response to Officer Working Group comments. Draft Review Report consultation comments on this policy noted (Table 4, Appendix 2 refers). These will be considered as part of the LDP revision process.
S14	Waste	Functioning effectively. Amendments may be required to reflect changes to national waste policy.
S15	Minerals	Functioning effectively. Amendments may be required to reflect changes to regional minerals policy.
S16	Transport	Functioning effectively. Amendments required to reflect replacement of Regional Transport Plan with Local Transport Plan.
S17	Place Making and Design	Functioning effectively, consideration will be given to minor amendments in response to Officer Working Group comments.

**Table 2: Review of Development Management Policies**

Development Management Policies		Commentary
H1	Residential Development in Main Towns, Severnside Settlements and Rural Secondary Settlements	Functioning effectively, consideration will be given to minor amendments in response to Officer Working Group comments.
H2	Residential Development in Main Villages	Functioning effectively.
H3	Residential Development in Minor Villages	Main thrust of policy functioning effectively. Some amendments required in response to Officer Working Group comments.
H4	Conversion/Rehabilitation of Buildings in the Open Countryside for Residential Use	Adopted Rural Conversions to a Residential or Tourism Use (Policies H4 and T2) SPG provides further clarity on implementation of this policy. Some amendments required in response to Officer Working Group comments to improve clarity.

Development Management Policies		Commentary
H5	Replacement Dwellings in the Open Countryside	Main thrust of policy functioning effectively. Some amendments required in response to Officer Working Group comments. Adopted LDP Policies H5 and H6 Replacement Dwellings in the Open Countryside and Extension of Rural Dwellings SPG may require updating accordingly.
H6	Extension of Rural Dwellings	Functioning effectively.
H7	Affordable Housing Rural Exceptions	Functioning effectively although limited applications received since LDP adoption. Consideration will be given to minor amendments in response to Officer Working Group comments.
H8	Gypsy, Traveller and Travelling Showpeople Sites	Functioning effectively, consideration will be given to minor amendments in response to Officer Working Group comments and to align with national planning policy guidance. Draft Review Report consultation comments on this policy noted (Table 4, Appendix 2 refers). These will be considered as part of the LDP revision process.
H9	Flat Conversions	Functioning effectively, consideration will be given to minor amendments in response to Officer Working Group comments.
CRF1	Retention of Existing Community Facilities	Amendments required in response to Officer Working Group comments.
CRF2	Outdoor Recreation /Public Open Space and Allotment Standards and Provision	Functioning effectively. Revise standards in line with updated Fields of Trust standards and consider minor amendments in response to Officer Working Group comments.
CRF3	Safeguarding Existing Recreational Facilities and Public Open Space	Functioning effectively.
RET1	Primary Shopping Frontages	Functioning effectively. Review, and where necessary, revise Primary Shopping Frontages to ensure designations are up to date and appropriate.
RET2	Central Shopping Areas	Functioning effectively. Review, and where necessary, revise Central Shopping Areas to ensure designations are up to date and appropriate.
RET3	Neighbourhood Centres	Functioning effectively. Review, and where necessary, revise Neighbourhood Centres to ensure designations are up to date and appropriate. Consideration will be given to minor amendments in response to Officer Working Group comments.
RET4	New Retail Proposals	Functioning effectively, consideration will be given to minor amendments in response to Officer Working Group comments. Amendments may be required to reflect changes to national retail policy.
E1	Protection of Existing Employment Land	Some amendments required in response to Officer Working Group comments to improve clarity.
E2	Non-allocated Employment Sites	No relevant applications since LDP adoption, consideration will be given to minor amendments in response to Officer Working Group comments.

Development Management Policies		Commentary
E3	Working from Home	Delete policy, considered unnecessary and sufficiently covered by other policies.
RE1	Employment within Villages	Consideration will be given to minor amendments in response to Officer Working Group comments to improve clarity.
RE2	Conversion/Rehabilitation of Buildings in the Open Countryside for Employment Use	Functioning effectively, consideration will be given to minor amendments in response to Officer Working Group comments to improve clarity.
RE3	Agricultural Diversification	Functioning effectively, consideration will be given to minor amendments in response to Officer Working Group comments to improve clarity.
RE4	New Agricultural and Forestry Buildings	Functioning effectively.
RE5	Intensive Livestock and Free Range Poultry Units	Functioning effectively, consideration will be given to minor amendments in response to Officer Working Group comments.
RE6	Provision of Recreation, Tourism and Leisure Facilities in the Open Countryside	Functioning effectively, consideration will be given to minor amendments in response to Officer Working Group comments.
T1	Touring Caravan and Tented Camping Sites	Functioning effectively, consideration will be given to amendments to improve clarity in response to Officer Working Group and Economy & Development Select Committee's comments.
T2	Visitor Accommodation Outside Settlements	Functioning effectively, consideration will be given to amendments to improve clarity in response to Officer Working Group and Economy & Development Select Committee's comments. The SPG on Sustainable Tourism Accommodation has provided further clarity.
T3	Golf Courses	No applications received since LDP adoption. Consideration will be given to amendments in response to Officer Working Group comments.
SD1	Renewable Energy	Functioning effectively. Amendments may be required to reflect changes to national renewable energy policy. Draft Review Report consultation comments on this policy noted (Table 4, Appendix 2 refers). These will be considered as part of the LDP revision process.
SD2	Sustainable Construction and Energy Efficiency	Functioning effectively. Amendments to supporting text required to reflect changes to national renewable energy policy and deletion of TAN22. Other amendments to the policy may also be required as a result. Draft Review Report consultation comments on this policy noted (Table 4, Appendix 2 refers). These will be considered as part of the LDP revision process.
SD3	Flood Risk	Delete policy, considered sufficiently covered by national policy. Draft Review Report consultation comments on this policy noted (Table 4, Appendix 2 refers). These will be considered as part of the LDP revision process.



Development Management Policies		Commentary
SD4	Sustainable Drainage	Functioning effectively.
LC1	New Built Development in the Open Countryside	Functioning effectively, consideration will be given to minor amendments in response to Officer Working Group comments.
LC2	Blaenavon Industrial Landscape World Heritage Site	Functioning effectively, consideration will be given to minor amendments in response to Officer Working Group comments.
LC3	Brecon Beacons National Park	Functioning effectively, consideration will be given to minor amendments in response to Officer Working Group comments.
LC4	Wye Valley AONB	Functioning effectively, consideration will be given to minor amendments in response to Officer Working Group comments.
LC5	Protection and Enhancement of Landscape Character	Functioning effectively, consideration will be given to minor amendments in response to Officer Working Group comments. The Landscape SPG will provide further clarity on interpretation and implementation of this policy once adopted.
LC6	Green Wedges	Review Green Wedge's and revise boundaries as necessary to ensure designations are justified. Draft Review Report consultation comments on this policy noted (Table 4, Appendix 2 refers). These will be considered as part of the LDP revision process.
GI1	Green Infrastructure	Adopted Green Infrastructure SPG provides further clarity on implementation of this policy. Functioning effectively, consideration will be given to minor amendments in response to Officer Working Group comments.
NE1	Nature Conservation and Development	Functioning effectively, amendments required to reflect changes to legislative framework and national policy.
EP1	Amenity and Environmental Protection	Functioning effectively, consideration will be given to minor amendments in response to Officer Working Group comments.
EP2	Protection of Water Sources and Water Environment	Functioning effectively.
EP3	Lighting	Functioning effectively, consideration will be given to minor amendments in response to Officer Working Group comments.
EP4	Telecommunications	Functioning effectively.
EP5	Foul Sewage Disposal	Functioning effectively.
W1	Waste Reduction	Functioning effectively. Limited applicability, consider whether still required.
W2	Waste Recovery Facilities: Household	Functioning effectively. Limited applicability, consider whether still required.

Development Management Policies		Commentary
W3	Waste Management Facilities	Functioning effectively.
W4	Rural Composting	Functioning effectively.
W5	Waste Disposal by Landfill or Landraising	Functioning effectively.
W6	Waste Deposition on Agricultural Land for Agricultural Improvement Purposes	Functioning effectively.
M1	Local Building and Walling Stone	Functioning effectively.
M2	Minerals Safeguarding Areas	Functioning effectively. Draft Review Report consultation comments on this policy noted (Table 4, Appendix 2 refers). These will be considered as part of the LDP revision process.
M3	Mineral Site Buffer Zones	Functioning effectively. Buffer zone for Livox Quarry requires deletion following refusal of planning permission to continue mineral extraction.
MV1	Proposed Developments and Highway Considerations	Functioning effectively. Draft Review Report consultation comments on this policy noted (Table 4, Appendix 2 refers). These will be considered as part of the LDP revision process.
MV2	Sustainable Transport Access	Functioning effectively. Draft Review Report consultation comments on this policy noted (Table 4, Appendix 2 refers). These will be considered as part of the LDP revision process.
MV3	Public Rights of Way	Functioning effectively.
MV4	Cycleways	Functioning effectively.
MV5	Improvements to Public Transport Interchanges and Facilities	Functioning effectively. Limited applicability, consider whether still required.
MV6	Canals and Redundant Rail Routes	Functioning effectively. Limited applicability, consider whether still required or whether amendment would be beneficial. Draft Review Report consultation comments on this policy noted (Table 4, Appendix 2 refers). These will be considered as part of the LDP revision process.
MV7	Rear Access / Service Areas	Functioning effectively. Limited applicability, consider whether still required.
MV8	Rail Freight	Functioning effectively. Limited applicability, consider whether still required.
MV9	Road Hierarchy	Functioning effectively. Limited applicability, consider whether still required.
MV10	Transport Routes and	Amendments required to reflect updated Local Transport Plan/Active Travel Act and associated schemes.

Development Management Policies		Commentary
	Schemes	
DES1	General Design Considerations	Functioning effectively, consideration will be given to amendments in response to Officer Working Group comments. Draft Review Report consultation comments on this policy noted (Table 4, Appendix 2 refers). These will be considered as part of the LDP revision process.
DES2	Areas of Amenity Importance	Functioning effectively. Review Areas of Amenity Importance to ensure designations are justified.
DES3	Advertisements	Functioning effectively, consideration will be given to minor amendments in response to Officer Working Group comments.
DES4	Advance Tourism Signs	Functioning effectively.
HE1*	Development in Conservation Areas	Functioning effectively, consideration will be given to minor amendments in response to Officer Working Group comments.
HE2*	Alterations to Unlisted Buildings in Conservation Areas	Functioning effectively, consideration will be given to minor amendments in response to Officer Working Group comments.
HE3*	Design of Shop Fronts in Conservation Areas	Functioning effectively.
HE4*	Roman Town of Caerwent	Functioning effectively.

\*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 Building of Local Interest and Historic Landscapes.

**Table 3: Review of Residential Site Allocations – General Matters**

<b>Residential Site Allocations – General Matters</b>	<b>Commentary</b>
Strategic Sites (SAH1-SAH7)	Review in relation to reconsideration of dwelling requirement and spatial strategy over extended plan period. Certain housing allocations have been delivered. All undelivered allocations will be reviewed to determine if they remain deliverable. Sites will be removed if considered to be undeliverable.
Urban Sites (SAH8-SAH9)	Progress being made on these sites as detailed below. However, undelivered allocations will be reviewed to determine if they remain deliverable. Sites will be removed if considered to be undeliverable.
Rural Secondary Settlements (SAH10)	Review in relation to reconsideration of spatial strategy. Certain housing allocations have been delivered. All undelivered allocations will be reviewed to determine if they remain deliverable. Sites will be removed if considered to be undeliverable.
Main Villages (SAH11)	Review in relation to reconsideration of spatial strategy. Certain housing allocations delivered. All undelivered allocations will be reviewed to determine if they remain deliverable, having regard to discussions with Registered Social Landlords and private developers. Sites will be removed if considered to be undeliverable.

**Table 4: Delivery of Allocated Residential Sites**

Delivery of Allocated Residential Sites			
Allocation	Site Name	Allocated No. units	Commentary
<b>Strategic Sites</b>			
SAH1	Deri Farm, Abergavenny	250	Site has full planning permission.
SAH2	Crick Road, Portskewett	285	No planning application received. Site has been subject to pre-application discussions and a planning application is expected in spring 2018.
SAH3	Fairfield Mabey, Chepstow	350	Site has outline planning permission.
SAH4	Wonastow Road, Monmouth	450	Part of site has permission for 340 dwellings and is under construction. No planning application received for remainder of site.
SAH5	Rockfield Farm, Undy	270	Site has outline planning permission.
SAH6	Land at Vinegar Hill, Undy	225	No planning application received.
SAH7	Sudbrook Paper Mill, Sudbrook	190	Site has full planning permission for 212 dwellings and is under construction.
<b>Urban Sites</b>			
SAH8	Tudor Road, Wyesham	35	No planning application received. Site has been subject to pre-application discussions.
SAH9	Coed Glas, Abergavenny	60	Site has full planning permission for 51 dwellings, demolition of buildings has been undertaken but no meaningful progress with regard to commencement of built development.
<b>Rural Secondary Settlement Sites</b>			
SAH10(i)	Cwrt Burrium, Usk	20	No planning application received. Site has been subject to pre-application discussions.
SAH10(ii)	Land south School Lane, Penperlleni	65	Site has full planning permission and construction is at an advanced stage.
SAH10(iii)	Land at Chepstow Road, Raglan	45	No planning application received. Site subject to pre-application discussions.

Delivery of Allocated Residential Sites			
Allocation	Site Name	Allocated No. units	Commentary
<b>Main Village Sites</b>			
SAH11(i)(a)	Land adjacent Village Hall, Cross Ash	10	No planning application received.
SAH11(i)(b)	Land adjacent Cross Ash Garage	5	No planning application received. Working with landowner to bring it forward together with a rural exception site for 6 units. Site has been subject to pre-application discussions.
SAH11(ii)	Land at Well Lane, Devauden	15	No planning application received. Site was subject to pre-application discussions in July 2014 and there was developer interest at this time but progress has since stalled.
SAH11(iii)	Land to south east of Dingestow	15	No planning application received, but MHA have bought the land and are about to submit an application, working up design. Site has been subject to pre-application discussions.
SAH11(iv)	Land west of Grosmont	15	No planning application received. Landowner working with a planning consultant to address access issues.
SAH11(v)	Land to the north of Little Mill	15	No planning application received.
SAH11(vi)	Land rear Village Hall, Llanddewi Rhydderch	5	No planning application received.
SAH11(vii)	Land north west Llanellen	15	No planning application received. Site was subject to pre-application discussions in May 2016 and there was developer interest at this time but progress has since stalled.
SAH11(viii)	Land at Ton Road, Llangybi	10	No planning application received.
SAH11(ix)(a)	Land rear Carpenters Arms, Llanishen	5	Site has outline planning permission.
SAH11(ix)(b)	Land adjacent Church Road, Llanishen	5	No planning application received.
SAH11(x)	Land north Llanvair Kilgeddin	5	Planning application has been received.
SAH11(xi)	Land west of Mathern	15	No planning application received.

Delivery of Allocated Residential Sites			
Allocation	Site Name	Allocated No. units	Commentary
SAH11(xii)	Land south west of Penallt	10	Site has full planning permission.
SAH11(xiii)	Hill Farm, Pwllmeyric	15	Site has outline planning permission subject to the signing of a S106 Agreement.
SAH11(xiv)(a)	Land east Shirenewton (south of minor road)	5	No planning application received. Site has been subject to pre-application discussions.
SAH11(xiv)(b)	Land east Shirenewton (north of minor road)	5	Site has full planning permission and is under construction.
SAH11(xv)	Land adjacent Trellech School	15	Site delivered 2016/2017
SAH11(xvi)	Land adjacent Werngifford, Pandy	15	No planning application received. Site has been subject to pre-application discussions.

#### Key to Site Status



Site has current planning permission/ under construction



Planning application received or site has planning permission subject to the signing of a S106 Agreement



Site has been the subject of pre-application discussions



No progress to date

**Table 5: Delivery of Employment, Tourism and Waste Sites**

Employment, Tourism and Waste Sites		Commentary
<b>Employment Sites</b>		
SAE1	Identified Industrial and Business Sites	Functioning effectively, however, may require revision in relation to reconsideration of employment strategy. Certain industrial and business allocations have been delivered. All undelivered allocations will be reviewed to determine if they remain necessary/deliverable over an extended plan period.
SAE2	Protected Employment Sites	Functioning effectively. Revisions required to reflect change in status of sites within the employment hierarchy.
<b>Tourism Sites</b>		
SAT1	Tourism Sites	Functioning effectively, one Tourism site has been delivered since adoption. Review required of undelivered potential sites.
<b>Waste Sites</b>		
SAW1	Identified Potential Waste Management Sites	Revise as necessary in relation to reconsideration of waste strategy. Some sites require removal due to delivery for alternative uses.



## Appendix 2: Draft Review Report Consultation - Summary of the Key Issues Raised

A summary of the key issues raised in relation to the questions on the Draft Review Report consultation is provided below. The full consultation report on the Draft Review Report, incorporating MCC's responses and recommended changes to the Review Report, can be viewed via the following link: [LDP Draft Review Report Consultation Responses - Representor Order.pdf](#)

**Table 1: Question 1 Do you agree that the main issues that should be considered in the full LDP Review have been identified?**

- **Agree:** 18 respondents agree that the main issues have been identified
- **Disagree:** 12 respondents do not agree that the main issues have been identified
- **Neither Agree or Disagree:** 5 respondents neither agree or disagree that the main issues have been identified

Issue Raised	Representor	Change to Review Report (RR)
<b>Agree that the Main issues have been identified</b>		
Key policy indicators relating to housing provision have been considered, clear references to dwelling completions, affordable housing completions, housing land supply, the delivery of strategic housing sites and the fact they are not being achieved. Agree with most recent AMR to continue with an early review as a result of the need to address the shortfall in the housing land supply and facilitate the identification /allocation of additional housing land.	9.1, 13.1, 21.1, 23.1, 28.1, 30.1, 31.1, 47.1, 48.1, 50.1, 51.1, 52.1	No change.
<b>Do not Agree that the Main issues have been identified</b>		
More detail is required on infrastructure, highways and traffic.	1.1	No change. These matters will be considered as part of the LDP revision.

Issue Raised	Representor	Change to Review Report (RR)
Removal of Severn Bridge Tolls will result in additional pressure for additional housing, house prices and population in Monmouthshire.	1.1, 15.1, 20.1, 24.1, 34.1, 36.1, 37.1, 39.1, 45.1, 56.1	No change. These matters will be considered as part of the LDP revision.
Full revision needed as soon as possible, cannot afford to wait for joint working due to lack of completions since adoption. Need to ensure a continued deliverable 5 year supply of housing on suitable, deliverable sites.	12.1, 47.1	No change.
Further explanation required regarding joint working with neighbouring authorities and the production of Strategic Development Plans.	15.1, 39.1	Amendment to the RR to further address issues of joint working.
The DRR does not fully acknowledge that the adopted LDP placed an over-reliance on strategic site allocations, which have a long lead in period before development can take place.	20.1, 47.1	Amendment to RR to acknowledge an overreliance on strategic sites and lack of flexibility in the adopted LDP.
Need to extend the current plan period, the implications arising from this should be identified as a main issue. The plan period is not fully addressed, the Council should elaborate on the reason for selecting 2036 at the end of the plan period.	20.1, 23.1, 39.1	RR to be amended to clarify the proposed plan period.
More explanation and consideration of population and household projections should be provided.	20.1, 26.1, 34.1, 37.1, 46.1, 53.1	No change. These matters will be considered as part of the LDP revision.

**Table 2: Question 2 Do you agree that the existing LDP vision, issues and objectives remain relevant for a revised Plan?**

- **Agree:** 15 respondents agree that the existing LDP vision, issues and objectives remain relevant for a revised Plan
- **Disagree:** 5 respondents do not agree that existing LDP vision, issues and objectives remain relevant for a revised Plan
- **Neither Agree or Disagree:** 13 respondents neither agree or disagree that the existing LDP vision, issues and objectives remain relevant for a revised Plan

Issue Raised	Representor	Change to Review Report (RR)
<b>Agree that the existing LDP vision, issues and objectives remain relevant for a revised Plan.</b>		
The current LDP objectives and the Local Well-Being Plan objectives are complimentary to the seven goals of the Well-Being of Future Generations Act.	11.2, 40.2	No change
Support the LDP Spatial Strategy for focusing development within the three main market towns followed by Severnside Settlements.	12.2, 15.2	No change.
<b>Do not agree that the existing LDP vision, issues and objectives remain relevant for a revised Plan.</b>		
Need to add more flexibility into the Spatial Vision of the Plan, should be more focus on delivering housing outside the main towns to ensure continuity of supply and a range of sites to aid wider housing delivery.	9.2	No change. These matters will be considered as part of the LDP revision.
Since adoption of the LDP there have been a number of important contextual changes at a national, regional and local level that need to be considered in the vision, issue and objectives.	23.2, 36.2	As above.
The current housing supply position should also be reflected in the vision/issues and objectives. The failure to balance housing supply with demand has resulted in a worsening in the affordability of housing.	23.2	As above.
There are emerging issues which should be added that could influence the vision, issues and objectives, specifically, any impact as a result of the Severn Tolls abolition.	22.2, 23.2, 48.2, 52.2	As above.

**Table 3: Question 3 Do you agree that the adopted LDP Spatial Strategy is functioning effectively?**

- **Agree:** 6 respondents agree that the strategy is working
- **Disagree:** 17 respondents do not agree that the strategy is working
- **Neither Agree or Disagree:** 9 respondents neither agree or disagree with the functioning of the strategy

Key Issues Raised	Representor	Change to Review Report (RR)
<b>Agree that the Strategy is Working</b>		
Support strategy of focusing development in 3 main towns but additional sites needed which accord with this strategy	12.3, 15.3, 16.3, 47.3	Amend RR to make a recommendation on whether the strategy needs revising and, if so, the form the revision should take.
Spatial strategy is robust and effective	22.3	As above.
Strategy functioned effectively directing growth to higher order settlements. New strategy should continue to allow for housing growth in Severnside settlements to ensure alignment between economic and housing strategies (links to CCR City Deal and tolls)	45.3	As above.
<b>Disagree that the Strategy is Working</b>		
Strategy not working due to failure to make adequate assessment of need for gypsy traveller pitches and allocation of sites to meet existing need	4.3	As above.
Strategy failed due to overreliance on delivery of strategic sites and insufficient flexibility to allow for other sources of housing to come forward – led to shortfall of completions.	3.2, 13.3, 21.3, 40.3	As above.
Undelivered housing allocations need to be re-assessed to ensure they remain viable and deliverable	3.2, 13.3, 21.3, 34.2, 36.3	As above.
Need for greater flexibility and additional site allocations. Scope for increased delivery / small-medium size developments in Rural Secondary Settlements and Rural settlements.	23.3, 40.3, 42.2	As above.
Strategy should be reviewed in light of extended plan period and contextual changes since LDP adoption (aspirations and opportunities associated with CCR City Deal and Tolls)	23.3, 36.3, 53.3, 56.3	As above.

Key Issues Raised	Representor	Change to Review Report (RR)
Strategy should be re-assessed to include release of land outside settlement limits/ potential de-allocation of green wedge land.	36.3	As above.
60% AH contribution for main village sites should be reconsidered as too high (a reduction would improve viability of such sites and enable more to come forward)	3.2, 26.3, 42.3	As above.
Strategy too reliant on larger main town developments. Should consider development of smaller 'secondary' and 'rural' areas,	11.3	As above.
Level of housing growth needs to be reconsidered – 2014 projections cannot be relied on; factor in current undersupply due to allocated sites not coming forward at expected rates.	12.3, 15.3	As above.
Level of housing growth should not be reduced to past build rates (due to lack of 5 year supply against residual method)	20.3, 47.3	As above.
No justification in reviewing deliverability of outstanding strategic allocations	16.3	As above.
Oppose any additional sites – existing sites should be retained and reviewed properly	26.3	As above.
Strategy should be refined to encourage growth in a range of settlements including settlements where there has been no housing provision. There may have been changes to settlements that would have improved their level of sustainability e.g. Llanover – now a village shop	46.3	As above.
Strategy should include minor villages (up to 15 dwellings with focus on AH)	50.3	As above.
Strategy too focused on Severnside at expense of other areas e.g. Usk, which are suitable for additional development	51.3	As above.
Appropriate amount of development should be considered in rural areas to fulfil housing need (current strategy failed to detriment of rural locations)	52.3	As above.

**Table 4: Question 4 Do you agree with the findings of the LDP policy review?**

- **Agree:** 13 respondents agree with the findings of the LDP policy review
- **Disagree:** 16 respondents disagree with the findings of the LDP policy review
- **Neither Agree or Disagree:** 8 respondents neither agree or disagree with the findings of the LDP policy review

Main Issues Raised	Representor	Change to Review Report (RR)
<p><b>Policy S1 Spatial Distribution of New Housing Provision</b></p> <ul style="list-style-type: none"> <li>• Four representors consider that undelivered sites need to be de-allocated, and additional sites allocated.</li> <li>• Two representors consider that the spatial strategy is too reliant on housing in the main towns/Sevenside.</li> <li>• Other representors consider that this emphasis on the main towns is correct.</li> <li>• One representor considers that Sevenside had a disproportionate level of growth.</li> <li>• Five representors consider that there is scope for additional housing development in Rural Secondary Settlements or villages, with one representor referring to the requirement in TAN2 to ensure that all communities, both urban and rural, have sufficient good quality housing for their needs.</li> </ul>	<ul style="list-style-type: none"> <li>• 9.4, 13.4, 15.3, 16.4</li> <li>• 11.3, 40.3</li> <li>• 12.2, 20.2</li> <li>• 20.2</li> <li>• 23.3, 40.3, 42.1, 46.4, 52.3</li> </ul>	<p>Comments noted. Policy amendments will be considered as part of the LDP revision.</p>
<p><b>Policy S2 Housing Provision</b></p> <ul style="list-style-type: none"> <li>• Four representors consider that undelivered sites need to be de-allocated, and additional sites allocated.</li> <li>• One representor seeks a transparent dialogue before any sites are deallocated.</li> </ul>	<ul style="list-style-type: none"> <li>• 9.4, 13.4, 15.3, 16.4</li> <li>• 45.4</li> </ul>	<p>As above.</p>
<p><b>Policy S3 Strategic Housing Sites</b></p> <ul style="list-style-type: none"> <li>• Five representors consider that the LDP is overly reliant on strategic housing sites.</li> </ul>	<ul style="list-style-type: none"> <li>• 13.4, 20.1, 21.3, 40.3, 47.5</li> </ul>	<p>RR amended to acknowledge the overreliance on strategic housing sites in the adopted LDP. Policy amendments will be considered as</p>

Main Issues Raised	Representor	Change to Review Report (RR)
		part of the LDP revision.
<p><b>Policy S4 Affordable Housing Provision</b></p> <ul style="list-style-type: none"> <li>• One representor considered that affordable housing policies would benefit from clearer explanation.</li> <li>• One representor stresses the importance of affordable housing and considers that some employment allocations could be revised to allow affordable housing allocations.</li> <li>• Two representors reiterate the need for affordable housing requirements to be looked at flexibly and to be based on viability evidence.</li> <li>• One representor expresses concern that affordable housing requirements might be reduced.</li> </ul>	<ul style="list-style-type: none"> <li>• 1.4</li> <li>• 7.5</li> <li>• 9.4, 21.4</li> <li>• 28.4</li> </ul>	Comments noted. Policy amendments will be considered as part of the LDP revision.
<p><b>Policy S9 Employment Sites Provision</b></p> <ul style="list-style-type: none"> <li>• One representor considers that employment allocations should be revised to reflect e-commerce.</li> <li>• One representor requests the allocation of good quality, accessible employment sites in Abergavenny to reduce the need to travel.</li> <li>• One representor requests a revision of employment allocations to maximise the benefits from City Deal and changes to the Severn Bridge tolls.</li> <li>• One representor considers that small scale employment allocations should be made in minor villages.</li> </ul>	<ul style="list-style-type: none"> <li>• 7.6</li> <li>• 33.2</li> <li>• 36.3</li> <li>• 48.4</li> </ul>	As above.
<p><b>Policy S11 Visitor Economy</b></p> <ul style="list-style-type: none"> <li>• One representor supports the policy's aim to encourage tourism.</li> <li>• One representor considers that allocations for larger facilities is needed in addition to promoting sustainable tourism such as glamping.</li> <li>• One representor considers that the existing policy is overly restrictive.</li> </ul>	<ul style="list-style-type: none"> <li>• 30.2</li> <li>• 36.4</li> <li>• 48.2</li> </ul>	As above.
<p><b>Policy S13 Landscape, Green Infrastructure and the Natural Environment</b></p> <ul style="list-style-type: none"> <li>• One representor seeks clarification of this policy in particular with regard to how it affects development viability.</li> </ul>	<ul style="list-style-type: none"> <li>• 34.3</li> </ul>	As above.

Main Issues Raised	Representor	Change to Review Report (RR)
<p><b>Policy H8 Gypsy, Traveller and Travelling Showpeople Sites</b></p> <ul style="list-style-type: none"> <li>• One representor cautions against confusion need for pitches with demand.</li> <li>• One representor does not agree that Policy H8 is functioning effectively and argues that the 2009 needs assessment needs to be revised.</li> </ul>	<ul style="list-style-type: none"> <li>• 2.2</li> <li>• 4.4</li> </ul>	As above.
<p><b>Policy RET1 Primary Shopping Frontages</b></p> <ul style="list-style-type: none"> <li>• One representor supports a review of this policy to ensure designations are up to date and appropriate.</li> </ul>	<ul style="list-style-type: none"> <li>• 30.2</li> </ul>	As above.
<p><b>Policy SD1 Renewable Energy</b></p> <ul style="list-style-type: none"> <li>• One representor considers that renewable energy should be supported.</li> </ul>	<ul style="list-style-type: none"> <li>• 30.2</li> </ul>	As above.
<p><b>Policy SD2 Sustainable Construction and Energy Efficiency</b></p> <ul style="list-style-type: none"> <li>• One representor suggests that this policy may no longer be a planning function so should be reviewed.</li> </ul>	<ul style="list-style-type: none"> <li>• 3.3</li> </ul>	As above.
<p><b>Policy SD3 Flood Risk</b></p> <ul style="list-style-type: none"> <li>• Two representors object to the deletion of this important policy.</li> </ul>	<ul style="list-style-type: none"> <li>• 24.6, 26.6</li> </ul>	As above.
<p><b>Policy LC6 Green Wedges</b></p> <ul style="list-style-type: none"> <li>• Two representors consider that Green Wedges should be reviewed to allow additional housing growth.</li> <li>• One representor considers that Green Wedges should become Green Belt to be strengthened.</li> </ul>	<ul style="list-style-type: none"> <li>• 16.4, 47.3</li> <li>• 26.6</li> </ul>	As above.
<p><b>Policy M2 Minerals Safeguarding Areas</b></p> <ul style="list-style-type: none"> <li>• One representor considers that mineral safeguarding areas should be reviewed to ensure they are fit for purpose.</li> </ul>	<ul style="list-style-type: none"> <li>• 16.4</li> </ul>	As above.



Main Issues Raised	Representor	Change to Review Report (RR)
<b>Policy MV1 Proposed Developments and Highway</b> <ul style="list-style-type: none"> <li>One representor considers this policy needs to be strengthened to ensure sustainable development is accompanied by infrastructure.</li> </ul>	<ul style="list-style-type: none"> <li>26.6</li> </ul>	As above.
<b>Policy MV2 Sustainable Transport Access</b> <ul style="list-style-type: none"> <li>One representor suggested performance under this policy has probably improved but a detailed analysis could explore the scope for greater effectiveness.</li> </ul>	<ul style="list-style-type: none"> <li>37.4</li> </ul>	As above.
<b>Policy MV6 Canals and Redundant Rail Routes</b> <ul style="list-style-type: none"> <li>One representor considers that the benefit of this policy is limited due to its limited scope and that a strong canal-related policy should replace it, emphasising the multiple benefits of the Mon-Brecon Canal.</li> </ul>	<ul style="list-style-type: none"> <li>6.1</li> </ul>	As above.
<b>Heritage Policies</b> <ul style="list-style-type: none"> <li>One representor considers that heritage policies will need to be reconsidered in light of the Historic Environment Act.</li> </ul>	<ul style="list-style-type: none"> <li>49.1</li> </ul>	As above.
<b>Policy DES1 General Design Considerations</b> <ul style="list-style-type: none"> <li>One respondent questions if this policy is functioning entirely effectively.</li> </ul>	<ul style="list-style-type: none"> <li>34.3</li> </ul>	As above.
<b>Policy DES2 Areas of Amenity Importance</b> <ul style="list-style-type: none"> <li>One representor expresses concern that open spaces are being reviewed but they will be more important if extra development is to be proposed.</li> <li>One representor welcomes this review.</li> </ul>	<ul style="list-style-type: none"> <li>28.4</li> <li>34.3</li> </ul>	As above.
<b>Policy SAH11 Main Villages</b> <ul style="list-style-type: none"> <li>Two representors considers that policy amendments are needed to make SAH11 Main Village sites viable and deliverable.</li> <li>One representor would welcome the reconsideration of sites for affordable housing if other constraints have been overcome.</li> <li>One representor strongly objects to any additional development sites main villages.</li> </ul>	<ul style="list-style-type: none"> <li>3.5, 9.3</li> <li>5.1</li> <li>26.6</li> </ul>	As above.

**Table 5: Question 5 Do you agree that the LDP needs to be revised? If so, short form or full revision?**

- **Short Form:** 11 respondents support a short form revision of the LDP
- **Full Revision:** 28 respondents support a full revision of the LDP

Main Issues Raised	Representor	Change to Review Report (RR)
<b>Support a Short Form Revision</b>		
SFR to enable Policy SAH11 to be revised (ensure main village allocations are viable and deliverable)	3.5	RR to be amended to make a recommendation on whether or not a LDP revision should take place and, if so, whether it should be a short form or full revision.
SFR to enable housing supply situation to be addressed	32.5, 40.5	As above
SFR unlikely to require substantial allocations of new housing land or a new spatial strategy, it may enable some other revisions and would avoid a policy vacuum. Provides breathing space for regional /interregional needs to be assessed. Comments on joint plans but notes that given political and practical challenges of collaborative working do not consider that a joint plan could be adopted in time to avoid a policy vacuum. SFR would allow time to progress on SDP providing context for a joint LDP. Concern that joint plan would be less tuned to needs of Monmouthshire’s towns/countryside and residents would have less influence on policies and proposals.	37.5	As above
SFR would allow for some critical new ‘local’ policies to be put in place quickly and would avoid a potential policy vacuum after 2021.	55.4	As above

Main Issues Raised	Representor	Change to Review Report (RR)
<b>Support a Full Revision</b>		
Full revision to ensure all housing needs, including G/T, are addressed	4.5	As above
Full revision needed to meet WG regulations, ensure provision made to extend the plan period. Existing strategy is not working, need for updated housing requirements and land allocations to end of revised plan period.	9.5, 13.5, 21.5	As above
Full revision needed to ensure strategies and policies are kept up-to-date based on latest evidence to support the future supply of housing.	12.5, 15.5, 45.5	As above
Full review should commence as soon as possible – MCC cannot afford to wait for joint working on a joint plan given current housing land supply situation	15.5	As above
Full review needed to take account of contextual, legislative and policy changes that have occurred e.g. CCR City Deal (economic opportunities)	16.5, 23.5, 24.5, 39.5	As above
Main towns should remain focus of revised strategy	21.5	As above
Full revision would ensure all matters are properly considered.	22.5	As above
Full revision would ensure LDP considers and addresses all factors (not just housing supply). This is important given interaction between housing supply and other aspects of the LDP e.g. policies (including spatial strategy, economic aspirations, infrastructure requirements and environmental/ landscape designations). Consequences of the level of change required justifies full revision.	23.5, 47.5	As above
Full revision – enable new, deliverable, viable housing allocations	34.5	As above
Full revision – enable significant changes to the level and spatial distribution of growth over a longer plan period. Extended plan period and associated land requirements will result in substantial changes to the strategy.	36.5	As above
Full revision required to address shortfall in housing land supply and to identify additional sites. Level and distribution of growth must have regard to contextual matters such as tolls, CCR City Deal (align with economic aspirations for the region). Full revision needed in addition to progressing a SDP.	53.5	As above

**Table 6: Question 6 Other Comments on the Draft Review Report**

Main Issues Raised	Representor	Change to Review Report (RR)
Consider opportunities associated with the removal of the Severn Bridge Tolls	1.8	No change. This matter will be considered and addressed as part of the LDP revision.
Should not rely solely on the 2011 and 2014 projections. A wide range of factors should be taken into consideration in considering growth options, including the opportunities associated with the abolition of Severn Bridge Toll and CCR City Deal.	9.6, 13.6, 21.6, 22.6, 23.6	As above.
Ensure Welsh Water are consulted to ensure the provision of foul drainage to mains public sewer on allocated sites is feasible within their AMP programme. Consider whether SFCA is required.	10.4, 35.1	As above.
Further consideration should be given to the potential for preparing a joint plan.	14.1	Review Report to be amended to further address this issue.
Suggest that an urban capacity study is carried out to consider capacity of growth of main towns and identify appropriate 'preferred directions' for future housing development – could inform the candidate site assessment process.	20.6	No change. This matter will be considered and addressed as part of the LDP revision.
Consider that preparation of a joint plan with neighbouring authorities would not be efficient or appropriate at the present time as it would delay provision of appropriate plan-led controls in place to guide local development. A SDP would provide the suitable regional tier of plan and would allow for further collaborative working.	22.6	No change.
Suitability of some housing sites needs to be reassessed.	28.6	No change. This matter will be considered and addressed as part of the LDP revision.
Community involvement in the revision process, including housing growth and site selection, is very important. Role of place plans and town teams should be recognised.	29.1, 33.6	As above.
Any new housing growth must be matched by growth in infrastructure.	29.1	As above.

Main Issues Raised	Representor	Change to Review Report (RR)
A number of representors are seeking to promote sites.	9, 12, 13, 15, 16, 20, 47, 48, 50, 51, 52	As above.

This page is intentionally left blank

## Q1 (Section 2) : Do you agree that the main issues that should be considered in the full LDP Review have been identified?

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
1.1	Chepstow Society	Disagree	More detail on infrastructure, highways and traffic. The removal of the Severn Bridge tolls will result in pressure on housing, house prices and population in the Chepstow area.	Comment noted. The removal of the bridge tolls is considered in paragraphs 2.2.16 and 5.4 of the Draft Review Report. Infrastructure, highways and traffic are matters that will be considered in any LDP revision.	No change to the Review Report (RR)
3.1	Trustees of the Late Mrs H M Langham	Agree		Agreement noted.	No change to the RR.
4.1	Heine Planning	Agree	Pleased to note consideration of Gypsy Traveller issues and need for sites	Agreement noted.	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
7.1	Mr Alan Horne	Disagree	<p>What impact, if any, will loss of the EU Structural and Rural Development Funds have? Broadband fixed and mobile connectivity are essential tools of modern day living, business and working from home. There are a number of black spots in Monmouthshire which might prevent people moving to those areas. The growing trend of home working should be taken into account when reviewing land allocated for employment. Are the assumptions made in the past still relevant? Should the priority be to re-allocate land for employment to residential and recognise the realities of modern day living and working? What guidance, if any, should be given to planners in ensuring new home are connected by fibre and cater for home working?</p>	<p>Comments noted. Given the uncertainty over the timing and form of any exit from the European Union it is not considered appropriate or necessary to consider this issue in the RR. The importance of broadband connectivity is recognised although the LDP can have limited influence over this issue. The potential deallocation of employment land will be a matter to be considered in any LDP revision. It is agreed that consideration needs to be given to employment sectors and land requirements as part of any plan revision.</p>	No change to the RR.



Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
9.1	SA Brain & Co Ltd	Agree	The key policy indicators relating to housing provision have been considered. There is clear references to dwelling completions, affordable housing completions, housing land supply and the delivery of strategic housing sites and the fact that they have not been achieved over the past four years. Correctly, this has been identified as the main priority and issue to be considered as part of the full LDP Review. Agree with the recommendation of the most recent AMR to continue with an early review of the Monmouthshire LDP as a result of the need to address the shortfall in the housing land supply and facilitate the identification/allocation of additional housing land.	Agreement noted.	No change to the RR.
10.1	Natural Resources Wales	Agree	The main issues to be considered in the full LDP Review have been identified. With regard to section 2.2.7, The South-East Wales Area Statement is currently being developed and is due to be finalised in 2019. Happy to assist with any queries on the development of the Area Statement and its evidence base.	Agreement noted.	Amend para. 2.2.7 of the RR to note that the South East Wales Area Statement is due to be finalised in 2019.
11.1	Mr Paul Cawley	Agree		Agreement noted.	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
12.1	RPS Planning	Disagree	A full review of the plan needs to occur as soon as possible. Monmouthshire County Council (MCC) cannot afford to wait for joint working to put a plan in place due to the evidenced lack of completions since the LDP was adopted in 2014 and to ensure a continued deliverable 5 year supply of housing on suitable, deliverable sites in main towns such as Abergavenny.	Comment noted. The RR acknowledges a need for additional housing sites and is currently not suggesting carrying out a joint plan with neighbouring authorities, a position that the respondent appears to support.G63	No change to the RR.
13.1	Ward Estates Ltd	Agree	Agree that the key policy indicators relating to housing provision i.e. dwelling completions, affordable housing completions, housing land supply and the delivery of strategic housing sites are not being achieved and are the main priority and issues to be considered as part of the full LDP Review. Also agree with the recommendation of the most recent AMR to continue with an early review of the Monmouthshire LDP as a result of the need to address the shortfall in the housing land supply and facilitate the identification/allocation of additional housing land.	Agreement noted.	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
15.1	Bovis Homes (RPS)	Disagree	If decide to progress with a Monmouthshire only focused LDP, further justification should be provided regarding joint working with neighbouring authorities and the production of Strategic Development Plans (SDP). The relationship between the LDP review, future SDPs and the City Deal should be fully explained and explored should future cross-boundary working to deliver housing and economic development become meaningful and collaborative.	Comments noted. The RR will be amended to further address the issue of joint working etc., although the respondent appears to support the Council's current position that a joint plan is not appropriate at the present time.	The RR to be amended to further address the issues of joint working etc.
15.1			Notwithstanding this it is considered a full review of the plan needs to occur as soon as possible. MCC cannot afford to wait for joint working to put a plan in place due to lack of completions, to ensure a continued deliverable 5 year supply of housing and to assess and address the extent of the impact of Cardiff Capital Region and the reduction/abolition of the Severn Bridge Tolls on a Monmouthshire basis. It is considered that the impact of their removal will be more significant than just an uplift in house prices, the area, and in particular, Monmouth and Chepstow will become even more of a desirable place to live thereby coming under pressure for further housing growth. The impact should be fully explored and included within growth rate figures included within the LDP Review	It is not agreed that the issues of potential increased housing growth should be addressed in the Review Report. This will be a matter to be considered in any LDP revision.	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
16.1	Bovis Homes (Walsingham Planning)	Agree		Agreement noted.	No change to the RR.
20.1			A further issue not fully addressed is the plan period which is proposed to extend to 2036. It is assumed that this year has been selected as it would allow for a 15 year plan period. Guidance in Planning Policy Wales (2.1.5) advises that at least 10 years of the plan period should remain at the point of adoption. It is clear that the aim is to avoid the previous position where following adoption only 7 years remained in the plan period. The Council should elaborate on the reason for selecting 2036 as the end of the plan period.	It is recommended that a revised Plan period should cover a period of 15 years with a start date of 2018. This allows four years for Plan preparation and ensures the required ten year period from the date of Plan adoption. This would result in a Plan running from 2018 to 2033, which aligns with Torfaen's proposals and enables a consistent (and where appropriate, joint) evidence base with collaborative working. However, this end date may require amending to align with the SDP.	RR to be amended to clarify the proposed plan period.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
20.1			Section 2 also refers to revised household projections. Whilst the 2014 population and household projections favour a higher level of growth than the earlier 2011 projections, they remain lower than the 2008 projections which informed the current LDP. The 2014 based projections would have resulted in the need for 240 dwellings a year if they had been applied to the Plan Period 2011 – 2021. Completions achieved during that period have exceeded this figure and would have increased if a wider choice of deliverable sites had been provided. This should not therefore be used as a justification for projecting similar figures to the whole of the extended plan period up to 2036.	Comment noted. The appropriateness, or otherwise, of the more recent Welsh Government population and household projections will be a matter to be considered in any LDP revision.	No change to the RR.
20.177	Hallam Land Management (Asbri)	Disagree	Whilst the limited progress of strategic housing sites is discussed as a key policy indicator, the section does not fully acknowledge that the adopted LDP placed an over-reliance upon the strategic site allocations, which have a long lead in period before development can take place. It will be important in reviewing the plan that a greater proportion of non strategic sites, which can be shown to be capable of early delivery, should be considered as part of the review process.	Comment noted. This will be a matter to be considered through any LDP revision.	RR to be amended to acknowledge that there is an overreliance on strategic sites and associated lack of flexibility in the adopted LDP.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
20.1			The Council should not project a lower dwelling requirement over the whole of the new plan period up to 2036. An anticipated build rate of 250 dwellings a year would be insufficient and would not meet demand associated with economic growth, in particular relating to the removal of Severn Bridge tolls.	Comment noted. The level of any future housing growth will be a matter to be considered in any LDP revision.	No change to the RR.
21.1	Hallam Land Management (Boyer)	Agree	Agree that the key policy indicators relating to housing provision i.e. dwelling completions, affordable housing completions, housing land supply and the delivery of strategic housing sites are not being achieved and are the main priority and issues to be considered as part of the full LDP Review. Also agree with the recommendation of the most recent AMR to continue with an early review of the Monmouthshire LDP as a result of the need to address the shortfall in the housing land supply and facilitate the identification/allocation of additional housing land.	Agreement noted.	No change to the RR.
22.1	Redrow Homes	Agree	The influence of crossing the Severn bridge for no cost will need to be carefully considered when looking at future housing requirements and employment growth. The WG commissioned Arcadis Report 'Longitudinal Viability Study of the Planning Process' and recommendations within should be considered.	Agreement noted. The WG commissioned Arcadis Report 'Longitudinal Viability Study of the Planning Process' can be taken into account in any LDP revision.G117	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
23.1	Richborough Estates (Turley)	Neither Agree Nor Disagree	The Report provides a useful overview of the issues that should be considered as part of the LDP Review. Agree that housing provision and supply are key issues to be addressed. This is demonstrated by the Council's AMR, which identifies a significant under provision of new dwellings since adoption of the LDP. The AMR confirms that this failure to deliver sufficient housing has also led to a significant under provision of affordable housing. The need to extend the current plan period, and the implications arising from this, should also be identified as a main issue in this section. Many of the issues identified are 'fluid' and will need to be given due consideration as the review progresses, e.g. the implications of the Cardiff Capital Region and City Deal and progress with Strategic Development Plans.	Comments noted. The RR recognises the need for additional housing allocations. Other issues referred to will be considered as part of any LDP revision. It is recommended that a revised Plan period should cover a period of 15 years with a start date of 2018. This allows four years for Plan preparation and ensures the required ten year period from the date of Plan adoption. This would result in a Plan running from 2018 to 2033, which aligns with Torfaen's proposals and enables a consistent (and where appropriate, joint) evidence base with collaborative working. However, this end date may require amending to align with the SDP.	RR to be amended to clarify the proposed plan period.
24.1	Mrs Carolyn Ovenden	Disagree	No account has been taken of the effect of probable removal of Severn Bridge tolls nor the potential problem of recyclable waste disposal now that it cannot be sent to China	The RR recognises that the removal of the Severn Bridge tolls could be a potential issue that would require consideration in any LDP review. Recycling policy is not a matter for the LDP, although if this influences the demand for recycling sites this could be considered as part of any LDP revision	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
26.1	Cllr Louise Brown	Disagree	Far too much focus on the lack of a 5 year supply of housing. In view of the 2008 population projections being too high then this factor needs to be taken into account. It would be far better to adopt a lower population projection to avoid this problem in the future. If a lower population projection level was used then this would require a lower build rate and may then bring the LDP within the 5 year supply without having to do anything further. It would also avoid any unnecessary additional sites which are not already in the current approved local development plan. A lower population projection would make it easier to reach the 5 year supply of housing and be more realistic in terms of building rates. The LDP draft review seems to have one focus only the emphasis should be on providing good quality sustainable development with the required infrastructure and considering the wellbeing of residents and their air quality.	Comments noted. Reducing the housing target could only be done through a revision to the LDP. The appropriateness, or otherwise, of the more recent Welsh Government population and housing projections will be an issue to be considered in any LDP revision.	No change to the RR.



Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
28.1	Llangybi Community Council	Neither Agree Nor Disagree	Agree that the main issues, namely the failure to meet the housing and affordable housing targets by some considerable margins, have been identified. The question needs to be asked – why have so many of the main villages sites failed to attract any interest from developers? Changes in local amenities since the original viability assessments were carried out could be the reason and so a complete reassessment is warranted.	Comment noted. The RR acknowledges (para 3.3 .8) that there is a need to consider revisions to the rural housing policies and/or how they are implemented, although within a general context that the primary aim of the Main Village allocations is to make provision of affordable housing for local people living in the rural parts of the County.	No change to the RR.
30.1	Monmouth Chamber of Commerce	Agree	Concur with the need in 2.1.3 of the Draft Report to increase the number of affordable housing completions during the remaining period of the LDP. Support the creation of skilled jobs with pay rates above the minimum wage (it is an objective of the existing LDP to create higher paid skilled jobs), which would mean that younger people could afford local house prices (see 2.2.16) . Support the principles of the Cardiff Capital Region City deal as described in 2.2.12 and efforts to rectify the underemployment of economically active women mentioned in 2.2.15.	Comments noted. These are matters to be considered in any LDP revision.	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
31.1	Mr Adrian Lewis	Agree	The review appears to consider comprehensively the issue. One factor worth considering is to challenge the Welsh Government's population projections given the possible impact of Brexit and the potential demand for properties from the Bristol area post toll-free crossing.	Comment noted. The level of any future housing growth will be a matter to be considered in any LDP revision and will take into account revised population projections and contextual changes such as those referred to by the respondent.	No change to the RR.
32.1	Mr Rees Williams	Agree	Agree except for housing and land shortfall due to changes in demand/supply.	Agreement noted.	No change to the RR.
33.1	Abergavenny Town Council	Agree	Agree that housing provision continues to be a significant issue in Monmouthshire. In Abergavenny we have seen significant residential development without any notable improvement to local infrastructure so would request that the policy relating to infrastructure provision is revisited. Also of the opinion that the design and quality of the residential development and other development that has taken place does not reflect the local vernacular and as a consequence the special character of the town is gradually being eroded. Consider protection of the economic and historical fabric of the market towns of the County to be a main issue. In recent months a number of shops in the town becoming vacant as a result of increase costs such as business rates. This is likely to worsen unless there are policies which actively support town centres to grow.	Comments noted. These are matters to be considered in any LDP revision. Business rates is not a matter that the LDP can influence.	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
34.1	Barratt David Wilson Homes	Comment	<p>Monmouthshire should follow the guidance within the Minister's letter in April 2014 and utilise the 2014-based housing projections as a starting point for calculating the future housing requirement only. The removal of the Severn Bridge toll is a major economic factor that is not accounted for within the household projections and will no doubt contribute to an increase in demand for new housing in Monmouthshire. To reduce the housing requirement in line with 2014-based housing projections would be overly simplistic and would result in the Local Planning Authority continuing to provide a shortfall of housing to meet the appropriate need.</p>	<p>The future level of housing growth will be a matter for any LDP revision. There is a need to consider whether the targets are appropriate in the light of, for example, the more recent Welsh Government population and household projections, the methodology for calculating a 5-year housing supply and past building rates, as well as the contextual change referred to by the respondent. Paragraphs 2.3.5 and 2.3.6 of the RR do not specifically state that any revised LDP's housing target should be reduced to take account of the more recent projections but states that they are factors that need to be taken into account in reconsidering the LDP Strategy's level of housing growth.</p>	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
36.1			<p>The existing position with regards to the undersupply of housing land is set to be further exacerbated by the reduction / removal of Severn Bridge tolls. It is considered that the full implications for the housing market in Monmouthshire must be considered. The increase in demand for houses in Monmouthshire will substantially increase pressure on an already underachieving housing market. The release of further land, particularly in southern/eastern Monmouthshire, for housing will be required to address both the current position, and the worsening position anticipated. The economic / employment opportunities presented by the removal of tolls is an issue which the LDP review should capitalise on by providing employment sites of a size and scale appropriate to meet potential demand. The LDP review should include a review of the LDP's employment land allocations to address this opportunity. The impact of the 'Cardiff Capital Region City Deal' is also a critical issue which the LDP review must fully consider.</p>	<p>Comments noted. These are matters to be considered in any LDP revision.</p>	<p>No change to the RR.</p>

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
36.1	East Mon Industrial Holdings Ltd (WYG)	Disagree	<p>It is agreed that a series of issues regarding housing provision are required to be considered as part of the LDP review. With the plan being adopted for only 4 years, and the housing land supply currently standing at just 4.1 years, significant and far-reaching changes to the plan are required to address issues surrounding housing provision. It is considered that in light of the magnitude of the shortfall in housing land supply, a comprehensive review of the plan's overarching spatial strategy will need to be undertaken, including a re-assessment of settlement boundaries and potential de-allocation of green wedge land to achieve deliverable housing sites of the extent demanded. In regard to the Authority's consideration of revised household projections it is agreed that it is appropriate to review the level of housing growth, but the 2014-based projections should not be adhered to at cost to both housing need and economic development. It is considered that the plan should provide for future need and growth as well as taking account of current need and historical under delivery. Furthermore the implications of the extended replacement plan period need to be fully assessed in terms of implications for housing growth.</p>	<p>Comments noted. The RR acknowledges that there is a need to consider new housing allocations. The respondent also seems to be suggesting that the LDP spatial strategy needs considerable revision, further suggesting that a Full revision of the LDP is required. The appropriateness, or otherwise, of the more recent Welsh Government population and household projections will be a matter to be considered in any LDP revision.</p>	<p>RR to be amended to make a recommendation on whether or not the LDP spatial strategy needs revising and to consider the implications for the form of any LDP revision. RR to be amended to make a recommendation on whether or not a LDP revision should take place and, if so, whether it should be a short form revision or a full revision.</p>

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
37.1	Abergavenny & District Civic Society		<p>What is meant by 'the full LDP Review' – the final version of this report or a full revision? The main issues are identified, but some extra analysis is needed to understand some key conclusions. The LDP process appears pre-occupied with ensuring a sufficient supply of housing with little consideration of the need to reduce the journey to work. The difficulties of securing a sustainable housing-work balance should be given greater consideration. The report implies that any plan revision will need to decide whether any employment sites should be de-allocated or re-allocated to other uses, and whether any new sites are required. Unfortunately, it does not contain any town-by-town analysis.</p>	<p>The scope for confusion over the terms 'review' and 'revision' is acknowledged. The RR does try to distinguish between the full review now being carried out - to be followed by a LDP revision if considered necessary. The benefits of a town-by-town analysis can be appreciated and will be looked at in more detail as part of any LDP revision process. It is not considered that such a level of detail is required at this stage, the aim of which is to assess, in broad terms, whether or not the existing LDP is working effectively.</p>	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
37.1			<p>Local Development Plans rely greatly on population and household projections supplied by Welsh Government. Variations in these undermine the credibility of the present plan and potentially its revision. As the extent of the need for extra homes is usually central to the debate during LDP preparation, the Review Report should give more explanation and consideration to the matter of projections and forecasts or targets based on planning objectives. The draft report exposes the slow delivery of extra homes between 2011 and 2021, more analysis of the housing market is needed e.g. have landowners (which include the county council) been holding on to land in the hope of higher residual values or because of S106 delays? Are house builders stemming supply to increase profits or finding that buyers cannot afford their products? At a time when population and household projections are significantly behind the provisions for housing in the adopted LDP, it would seem premature for the Review Report to imply a pressing need for substantial new allocations of land when sufficient land is already allocated. There is a danger that the allocation of more greenfield sites to satisfy the notional five-year supply requirement will undermine the development of more difficult brownfield sites; the real need is to expedite the</p>	<p>Comments noted. The future level of housing growth will be a matter for any LDP revision. The failure to meet housing targets as set out in the current LDP does suggest that policies need to be revised. This could result in the release of more housing land or, conversely, a re-consideration of the housing targets in the light of, for example, the more recent Welsh Government population and household projections, the methodology for calculating a 5-year housing supply and past building rates. These are matters to be considered in any LDP revision.</p>	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
			development of existing allocations, and the threat of de-allocation may help.		
37.1			<p>Disappointed that viability assessments at the stage of planning applications come to different conclusions from those conducted when sites were allocated. Wonder if some developers are overpaying for land at the expense of affordable housing contributions. While the policies may be realistic and necessary, it will be prudent to make more realistic forecasts of the amount of affordable housing likely to be delivered. A recent study in England found that 65% of councils are directly engaged in housing delivery themselves. Reasons include the need to accelerate the provision of homes, especially affordable homes, and to encourage local small builders, self-builders or co-operatives. Hope that the council will consider such engagement in the future. The impact of the abolition of Severn Bridge tolls on the housing market may require direct intervention.</p>	<p>Comments noted. Viability testing carried out by the Council's consultants during the preparation of the LDP did suggest that achieving the full percentages of affordable housing required by policy would be challenging on some of the strategic site allocations, e.g. Deri Farm in Abergavenny where the undergrounding of overhead electricity cables was resulting in considerable abnormal costs. Assessing the likely deliverability of any new site allocations will be an important element in the preparation of any revised LDP.</p>	No change to the RR.
39.1	Home Builders Federation	Neither Agree Nor Disagree	<p>Consider that the main issues are covered and note the detail in which this report covers these issues, however:</p> <p>Para 2.1.3 Delivery of Strategic Housing Sites - Suggest including a table showing all of the sites and their current position</p>	<p>Para. 2.1.3 Will add a reference to table 4 in Appendix 1.</p>	Change the RR where indicated in the LPA response.



Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
39.1			Para 2.1.4 Includes a statement 'many of which are independent of the planning system such as the wider economy and housing market'. This needs to be expanded and explained in more detail, both the wider economy and housing market are and have been at their strongest since the recession for the last few years	Para. 2.1.4 will add 'although both the wider economy and housing market have been at their strongest since the recession for the last few years'.	
39.1			Para 2.2 Contextual Changes - should include reference to the Arcadis Report 'Longitudinal Viability Study of the Planning Process'.	Para.2.2 Agreed, the Arcadis Report will be referenced in Section 2.2 of the RR, although the recommendations have not yet been translated into national planning policy guidance (PPW/LDP Manual).	
39.1			Para 2.2.11 Should be updated in view of Lesley Griffiths statement and letter to LPA's issued in December regarding joint working and SDPs.	Para. 2.2.11 Agreed. The RR will also be amended to further address the issues of joint working etc.	
39.1			Para 2.2.15 The wording regarding the economic performance of the area would seem to contradict the statement in 2.1.4.	Para 2.2.15 This paragraph is concerned with the employment market, economic activity etc. and not the wider economic conditions affecting the housing market. No change.	

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
39.1			Para 2.2.16 The impact of the removal; of the bridge toll is likely to be greater than just on house prices, although the current wording doesn't say this, there is a risk that house prices will go up as demand grows unless more homes are built and demand is met.	Para. 2.2.16 Comment noted.	
39.1			Para 2.3 The revised plan period would go beyond 2021, as currently worded this section is misleading and only shows the impact of a change in the figures over the current plan period. There should be additional explanation of the figures over the replacement plan period to 2036.	Para 2.3 Comment noted. However the purpose of this section is to analyse the implications of the recent projections for the current plan period. What they say for any extended plan period would be a matter for any LDP revision. This will be clarified in Section 2.3 of the RR.	
40.1	Magor with Undy Community Council	Agree		Agreement noted.	No change to the RR.
41.1	Philippa Cole	Agree		Agreement noted.	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
45.1	Bovis Homes Group (Lichfields)	Disagree	Accept that the main issue to be considered in the LDP Review relates to housing; however it is important that this review is not undertaken in isolation of other matters which influence these e.g.in relation to housing requirement, PPW makes it clear that the latest Welsh Government local authority level Household Projections for Wales, alongside the latest Local Housing Market Assessment, will form part of the plan's evidence base but that other key issues also need to be considered, such as what the plan is seeking to achieve, links between homes and jobs, the need for affordable housing, Welsh language considerations, the provisions of corporate strategies and the deliverability of the plan. Specifically, a key omission from the LDP Review Report is the consideration which needs to be given to the economy and the Plan's alignment between homes and jobs. This is demonstrated by the omission of consideration of economic performance as part of the 'Review of LDP Strategy' section of the report. The review of the level of housing growth should have full regard to the economic opportunities associated with abolishment of the Severn Bridge tolls it will also be necessary to have regard to the wider context such as the Council's long term economic priorities and aspirations linked to the Cardiff Capital	Comments noted. The appropriateness, or otherwise, of the more recent Welsh Government population and household projections, together with contextual issues such as City Deal and the abolition of the Severn Bridge charges, will be matters to be considered in any LDP revision. Other factors affecting the level of housing growth required will also be matters to be considered in any LDP Revision.	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
			Region City Deal and Future Monmouthshire.		
45.1			Careful thought also needs to be given to specific reasons why currently allocated sites have not progressed at the rate intended. This will clearly inform consideration of the location and scale of housing sites to be allocated in the future e.g. there are specific reasons why the proposed housing allocation (Land at Vinegar Hill, Undy, allocation reference SAH6), has not yet come forward - relating to the on-going M4 Relief Road CPO Inquiry. Particular consideration will need to be given to the level of flexibility allowance which is appropriate over the extended Plan period. Applying an appropriate allowance will be important for helping to ensure the Council maintains a 5 year housing land supply in the future by providing a range and choice of housing sites.	The RR acknowledges that there is a need to re-assess undelivered housing allocations and the respondent's site specific comments are noted. This will be a matter for any LDP revision. Paragraphs 3.3 .29-3.3 .35 of the RR refer to economic policy/ performance, with further analysis provided in the AMRs.	No cahnge to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
46.1			<p>Note that one of the key issues that does not appear to have been addressed within the Review report is the current affordability problem. The 2015 Housing Market Assessment prepared by Monmouthshire Council indicates that the annual need is now 473.3 dwellings. The high annual requirement reflects the significant under delivery to date which will have had the effect of suppressing household formation relative to what it would have been if plan targets had been delivered. This is a significant change in circumstance since the adoption of the Plan worsened by the problems in delivery of sites. The report suggests that there are sufficient allocations to meet requirements however there are a number of inherent issues within the supply pool that has resulted in a less than five year supply of land for housing. Larger strategic sites inevitably have varying lead in time for development that must be factored into land supply. Given the lead in times it is important that there is a ready supply of smaller sites to make up for any short term shortfall. The present supply pool has not been able to deliver such an immediate supply of sites except for windfalls. The village sites subject to 60% affordable housing requirements may need to be subject to renewed viability appraisal. If this level of affordable housing is not viable then they should be developed at a level that is.</p>	<p>Comments noted. The RR recognises that there is a need to increase the supply of housing land and identifies that there is an issue regarding the failure to meet affordable housing targets. The Housing Market Assessment referred to by the respondent was undertaken using a different methodology to that used in the LDP process. The two methodologies are not directly comparable and it is incorrect to say that the annual need has increased. The RR acknowledges (para 3.3 .8) that there is a need to consider revisions to the rural housing policies and/or how they are implemented, although within a general context that the primary aim of the Main Village allocations is to make provision of affordable housing for local people living in the rural parts of the County.</p>	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
46.1			<p>Given the supply side considerations there must be a flexible land supply to address short term requirements and also ensure that any constraints can be dealt with through the planning application process.</p>	<p>It considered reasonable to indicate that there is a need to consider whether the targets are appropriate in the light of, for example, the more recent Welsh Government population and household projections, the methodology for calculating a 5-year housing supply and past building rates, as well as wider contextual changes. These are factors that suggest that the LDP needs revising, along with the fact that the current LDP is not meeting its targets or achieving a 5-year housing supply, which may necessitate additional site allocations. The future level of housing growth will be a matter for any LDP revision.</p>	<p>No change to the RR.</p>

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
46.1	Llanover & Coldbrook Estate (LRM Planning)	Disagree	There are a number of issues that have arisen that are not fully reflected within the report. There has been new legislation in a number of areas (including the Planning Act), the report suggests that this could have a significant impact upon the strategy. However this has not altered Planning Policy in a substantive way that would require the overarching strategy of the plan to be changed. It is stated that a number of sites have not been progressing as quickly as anticipated due to the “wider economy and housing market”. It is highly unlikely that problems in economic performance or the housing market have impacted upon Monmouthshire, delays are more likely to be associated with site abnormalities, land owner intentions, lead in times, or development and policy constraints. The evidence of economic performance and demand suggest that there are no overarching economic / market led problems that would restrict growth.	Comments noted. The RR addresses recent legislative changes but does not suggest 'that this could have a significant impact upon the strategy' but that these are matters that require consideration. With regard to economic and market conditions it is recommended that a change be made to para. 2.1.4 (see Rep. no. 39.1).	Amend para 2.1.4 as in Rep. No. 39.1.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
47.1	Taylor Wimpey (Turley)		<p>Agree that housing provision and supply are key issues that need to be reviewed as part of the LDP Review. There is a very poor record of delivery and the current strategy is clearly not working. It is important that the shortfall in housing not be overlooked, the numbers involved reflect a lack in delivery of much needed housing to cater for the additional population needed to support the economy of Monmouthshire. A consequence of the shortfall in the delivery of market housing is the under delivery of affordable housing. Support the Council's intention that the reasons for lack of progress on strategic sites be investigated in order to understand why the key mechanism for delivering affordable homes (namely strategic sites) has failed. Additional deliverable sites in sustainable locations should be allocated to address both the market and affordable delivery issues. The Council argue that there are sufficient sites allocated to deliver a five year housing land supply, but that the issue is that they have not been coming forward as quickly as expected. Do not agree with this comment, as the severity of the shortfall in housing delivery and the extended delays on strategic sites is to a level that may mean the backlog is not made up within the plan period. If allocated sites are not capable of delivering the housing requirement then</p>	<p>Comments noted. The level of housing growth required will be a matter to be considered in any LDP Revision. It is not agreed that the LDP has a very poor record of housing delivery. All of the LDP strategic sites are being developed or coming forward for development, although the RR acknowledges that this is taking place more slowly than anticipated.</p>	No change to the RR.



Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
			the Council cannot claim that there are 'sufficient' allocated sites. Throughout the Report there is a question regarding the deliverability of the identified strategic sites, and sufficient sites should now be found to ensure delivery and maintenance of a five year supply at all points in time. This does not mean allocating the bear minimum level of sites technically required to meet provision but rather sufficient above that level to ensure a five year supply is maintained.		
48.1	Llanarth Estates (WPM Planning)	Neither Agree Nor Disagree	It is agreed that the main issues have been identified and that housing is a significant issue, particularly the lack of housing delivered during the plan period to date.	Comment noted.	No change to the RR.
50.1	Mrs Evelyn Birden (Newland Rennie)	Agree		Agreement noted.	No change to the RR.
51.1	Dr David Rosser (Newland Rennie)	Agree		Agreement noted.	No change to the RR.
52.1	Morris' of Usk (WPM Planning)	Neither Agree Nor Disagree	It is agreed that the main issues have been identified and that housing is a significant issue, particularly the lack of housing delivered during the plan period to date.	Comment noted.	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
53.1	Barton Willmore	Disagree	<p>Whilst the abolishment of the Severn Bridge tolls by the end of 2018 should not be underestimated there is a pressing need for the economic aspirations of the wider city-region, not least through the Cardiff Capital Region City Deal, to align with the level of housing provision within the Authority Area. Accordingly, whilst the Draft Review Report references the Welsh Government's 2014 household projections, it should be noted that, in line with PPW Para 9.2.2 that these 'should form the starting point for assessing housing requirements', they are projections that do not account for wider policy and economic considerations, which should be appropriately considered in any review of the LDP. Note and support that the Plan will need to be reviewed in line with the emerging update to Planning Policy Wales.</p>	<p>Comment noted. The appropriateness, or otherwise, of the more recent Welsh Government population and household projections will be a matter to be considered in any LDP revision.</p>	<p>No change to the RR.</p>

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
55.1	Abergavenny Transition Town (Late Rep)	Disagree	There is insufficient consideration of the relationship between employment issues and housing supply issues. There is an insufficient understanding of land/buildings allocated for employment. The standard employment space providers have no interest in what is the real complex demand of the future starter business that might lead to higher wage employment. There is no push to encourage Higher and Further education institutions to outsource and relocate departments in the area. The sectors of employment the LDP (and the Well being Plan ) assumes for growth, services, retail, tourism, agriculture etc are all low wage, casual, and often seasonal. There is a dissonance between that assumption and house prices/ supply.	Comments noted. These are matters to be considered in any LDP revision.	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
55.1			<p>WG methodology of housing projections are deeply flawed and not a reliable basis for allocating housing land. This needs revision. That said the targets for housing supply in terms of land allocation anyway could have been met, and in fact are being met as the review says, ( para 3.2 .14, 3.2.16 and 3.2 .18) if it wasn't for a complexity of market failure, delays in delivering, due to landowners hanging onto site expecting bigger profits, delays in sorting 106 agreement, developers just sitting on land for housing because that keeps existing sale prices high and a whole host of other market complexities and inefficiencies. Bound up with this is a failure to deliver affordable housing to the % allocations expected (para 3.2 .11). English councils are starting to build council housing again, why is that not on the table in Monmouthshire. To rebalance the demographic small sites have to be found and compulsorily purchased, to provide more experimental housing delivery systems for that younger demographic. While on the issue of demographics it seems extraordinary given the massive change in the demographic of the elderly that nothing is said about the land to provide for, or the overall provision of suitable space standard retirement homes. Growing space from allotments to Community Supported Agriculture tied in with homes should find its way into the thinking on</p>	<p>Comments noted. The future level of housing growth will be a matter for any LDP revision. The failure to meet housing targets as set out in the current LDP does suggest that policies need to be revised. This could result in the release of more housing land or, conversely, a re-consideration of the housing targets in the light of, for example, the more recent Welsh Government population and household projections, the methodology for calculating a 5-year housing supply and past building rates. With regard to the provision of affordable housing, viability testing carried out by the Council's consultants during the preparation of the LDP did suggest that achieving the full percentages of affordable housing required by policy would be challenging on some of the strategic site allocations, e.g. Deri Farm in Abergavenny where the undergrounding of overhead electricity cables was resulting in considerable abnormal costs. Assessing the likely deliverability of any new site allocations will be an important element in the preparation of any revised LDP. The other matters referred to are generally matters to be considered in any LDP revision. Matters such as potential council house building, compulsory purchase</p>	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
			the multi functional use of Open Space.	of land etc. are not matters for the LDP process. Current Green Infrastructure policies do support community growing etc.	
56.1	Monmouth Town Council (Late Rep)	Disagree	It was suggested that the projected growth in population and households in 2008 led to expressed projected need of 4000 dwellings in the county. But today the projected growth in 2014 and with an updated census the 4000 number of dwellings may be out of date. Given the local drivers on the removal of the bridge tolls demand may well exceed supply and therefore this should be revisited. It does not appear to be prudent not to revisit this and revisit the % of affordable social housing required by county on all new sites so that young people can get on the property ladder as property prices are rising and in a small rural town we need homes for young people within our towns. As a border town need to explore the links with LDP in the neighbouring border town as this impacts on the road infrastructure which is clearly evidenced by the third lane expansion on the A 40 and question the resilience of both our educational assessment of school places and the road resilience of the major arterial networks.	Comments noted. The appropriateness, or otherwise, of the more recent Welsh Government population and household projections will be a matter to be considered in any LDP revision. With regard to affordable housing the DDR (para. 3.3 .7) acknowledges that further viability testing will need to be carried out to ensure that affordable housing policy requirements are based on up to date information on development costs and values. Relationships with adjoining authorities will be a matter for consideration in the preparation of any revised LDP, as will infrastructure capacity.	No change to the RR.
57.1	Usk Town Council (Late Rep)	Agree	The Draft Review covers the key issues.	Agreement noted.	No change to the RR.

## Q2 (Section 3.1): Do you agree that the existing LDP vision, issues and objectives remain relevant for a revised Plan?

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
1.2	Chepstow Society	Agree	All the previous issues are desirable, so need to be carried into the next Plan and further developed.	Agreement noted.	No change to the RR.
3.2	Trustees of the Late Mrs H M Langham	Agree		Agreement noted.	No change to the RR.
4.2	Heine Planning	Neither Agree nor Disagree		Noted.	No change to the RR.
7.2	Mr Alan Horne	Agree		Agreement noted.	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
8.1	Ann Langford	Agree	<p>Considers that that LDP should not be reviewed at this stage. The existing vision, issues and objectives of the LDP are still relevant – it is the number of proposed dwellings that needs to be revised in line with current forecasts. The LDP’s current housing requirement, at 450 dwellings per annum, is significantly higher than the 180/240 dwellings that are required according to the most up-to-date forecasts.(2.3.6). In effect it is the target number of dwellings that needs to be halved – around 200/annum seems much more reasonable.</p>	<p>Comment noted. If a decision is made to revise the LDP, this will include revisiting the vision, issues and objectives. It is noted that the respondent considers that the LDP vision, issues and objectives are still relevant but that the numbers of dwellings should be revised downwards in line with current forecasts. Reducing the housing target could only be done through a revision to the LDP. The fact that the recent population and household projections are indicating reduced numbers to those that the LDP was based on suggests a need to reconsider the LDP's strategy's level of housing growth. However, the appropriateness, or otherwise, of the more recent Welsh Government population and housing projections will be an issue to be considered in any LDP revision.</p>	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
9.2	SA Brain & Co Ltd	Neither Agree nor Disagree	The existing LDP vision, issues and objectives remain relevant, they are topical issues that continue to be pertinent matters in the delivery of the LDP. In addition the vision and objectives align with contextual changes that have taken place since the LDP's original adoption in February 2014. However, there is a need to add more flexibility into the Spatial Vision of the Plan, there should be more focus on delivering housing in the settlements outside the main towns to support the strategic allocations in this location and to ensure continuity of supply and a range of sites. A more flexible approach within the lower tier settlements will allow more sustainable and appropriate sites to come through and aid wider housing delivery, thereby allowing the LDP to meet its wider strategic objectives.	Comment noted. It is acknowledged in the RR (para. 3.1 .9) that the spatial element of the LDP Vision may require changing should the LDP spatial strategy be revised.	No change to the RR.
11.2	Mr Paul Cawley	Neither Agree nor Disagree	The current LDP objectives and the Local Well-Being Plan objectives are complementary to the seven goals of the Welsh Government's Well-Being of Future Generation Act.	Comment noted.	No change to the RR.



Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
12.2	RPS Planning	Agree	Support the LDP Spatial Strategy for focusing within the three main market towns. Abergavenny, in particular is considered to be a highly sustainable settlement capable of supporting future growth in line with LDP objectives and Well-Being goals. In progressing allocations for future residential development, MCC however needs to ensure that site allocations are suitable and deliverable. Land at Ross Road, Abergavenny should be considered through the LDP Review process, it does not fall within any restrictive landscape designation and is some distance from the National Park boundary. The site is considered to be suitable for future residential development.	It is noted that the respondent supports the current LDP spatial strategy. The suitability, or otherwise, of any potential candidate site will be a matter to be considered in any LDP revision.	No change to the RR.
13	Ward Estates Ltd	Agree	In broad terms agree that the existing LDP vision, issues and objectives remain relevant for the revised Plan for Monmouthshire. They are topical issues that continue to be pertinent matters in the delivery of the LDP. In addition also of the view that the vision and objectives align with contextual changes that have taken place since the LDPs original adoption in February 2014.	Agreement noted.	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
15.2	Bovis Homes (RPS)	Agree	Support the LDP Spatial Strategy and focusing the delivery of development within the three main market towns followed by Severnside Settlements. These are sustainable settlements capable of supporting future growth in line with LDP objectives and Well-Being goals. In progressing allocations for future residential development, MCC however needs to ensure that site allocations are suitable and deliverable. However the LDP review not only needs to support the delivery of allocated sites which are proven to be suitable and deliverable, including those which have an already proven track record for delivering housing, but also allocate further housing sites which are evidenced to be free of constraint, associated with an established developer and which can be proven to be realistically viable and deliverable.	Agreement noted.	No change to the RR.
16.2	Bovis Homes (Walsingham Planning)	Agree		Agreement noted.	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
20.2	Hallam Land Management (Asbri)	Disagree	The adopted LDP, as a result of additional sites introduced at the Examination stage, allowed for a disproportionate level of growth in the Severnside settlements, despite the Strategy emphasis on the main towns. The Review will need to address this imbalance with a higher proportion of allocations in the market towns. Particularly in order to meet the Local Well-Being Plan objective – ‘Building Sustainable Communities’.	Comment noted. The respondent seems to support the current LDP spatial strategy, the main concern appearing to be that the final LDP allocations did not reflect this strategy, with a disproportionate amount of growth in Severnside.	No change to the RR.
21.2	Hallam Land Management (Boyer)	Agree	Agree in broad terms that the existing LDP vision, issues and objectives remain relevant for the revised Plan for Monmouthshire. They are topical issues that continue to be pertinent matters in the delivery of the LDP. In addition to this, also of the view that the vision and objectives align with contextual changes that have taken place since the LDPs original adoption in February 2014.	Agreement noted.	No change to the RR.
22.2	Redrow Homes	Agree	Severn Bridge Tolls, joint Severnside planning and City Deal could influence the LDP vision, issues and objectives too.	Agreement to current LDP vision, issues and objectives noted. It is recognised that the issues referred could influence the vision and objectives of any revised LDP.	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
23.2	Richborough Estates (Turley)	Disagree	<p>The broad key issues identified in the adopted LDP remain, on the whole, relevant. Notwithstanding this, since the adoption of the LDP there have been a number of important contextual changes at a national, regional and local level. This includes significant changes to the national policy framework, market and economic factors and progression of the Cardiff Capital Region and City Deal. Other contextual changes include a commitment to remove the Severn Tolls at the end of 2018, which, given the strategic location of Monmouthshire, will be an important factor over the plan period. The current housing supply position should also be reflected in the vision/issues and objectives. The failure to balance housing supply with demand has resulted in a worsening in the affordability of housing. Likewise, the 'vision' set out in the adopted plan was developed from a consultation exercise undertaken in 2008. The vision should be revisited to reflect the contextual changes and the extended plan period. The 'spatial implications' of achieving the LDP vision should also be updated and objectives reviewed in line with the key issues and vision.</p>	Comment noted. If a decision is made to revise the LDP, this will include revisiting the vision, issues and objectives.	No change to the RR.
24.2	Mrs Carolyn Ovenden	Neither Agree Nor Disagree	They remain relevant but the pending changes for Monmouthshire indicate that the review is already out of date.	Comment noted. If a decision is made to revise the LDP, this will include revisiting the vision, issues and objectives.	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
26.2	Cllr Louise Brown	Neither Agree nor Disagree	Aspects of the existing LDP vision are still relevant. However not enough account is taken of the health and well-being of residents in the planning process and in planning policy both in the LDP and nationally. Avoiding unneighbourly development needs to have far more policy emphasis e.g. not building in back gardens. Also concreting over areas has led to flooding in certain areas as there is less ground to soak up flash floods. The local planning policy has failed to fully take account of the wellbeing legislation in planning policy. In addition the prevention of residential development in flood Zone C2 needs strengthening, the LDP needs to have much greater emphasis on this aspect as well as underlying it with national planning policies such as TAN15. More emphasis needs to be placed in planning policy on looking at conditions to help mitigate development for neighbours.	Comment noted. If a decision is made to revise the LDP, this will include revisiting the vision, issues and objectives. Any revised LDP would have to consider the Well Being of Future Generations Act.	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
28.2	Llangybi Community Council	Neither Agree Nor Disagree	One of the strategic objectives in the Local Well-Being Plan is to reduce inequalities between communities. Rural communities are suffering from a poor infrastructure in terms of broadband, mobile signals and public transport which may be a factor in the significant shortfall in the housing target in rural areas. It should be noted that acceptable standards of broadband and mobile signal accessibility have increased significantly since the current LDP was adopted. Reductions in bus services are not compatible with the vision to 'reduce reliance on the private motor car '.	Comments noted. The importance of broadband connectivity is recognised although the LDP can have limited influence over this issue. Similarly, the LDP can have limited influence over bus service provision, although the current LDP put an emphasis on providing affordable housing for local people in rural areas of the County, notwithstanding limited public transport opportunities and having regard to the advice in TAN6 Planning for Sustainable Communities July: 'Where development proposals are intended to meet local needs, planning authorities should recognise that a site may be acceptable even though it may not be accessible other than by the private car' (paragraph 2.2.3)	No change to the RR.
31.2	Mr Adrian Lewis	Neither Agree Nor Disagree	The overall objectives remain the same, however the review appears not to have taken into account the sites that were not initially included in the LDP; including the Sudbrook Paper Mills Site. This was opposed by MCC until the Government Planning Inspector insisted on its inclusion to make up for past failures to meet housing targets.	Comment noted. The RR is a review of the adopted LDP - the site referred to is an allocation in the adopted LDP.	No change to the RR.
32.2	Mr Rees Williams	Agree	Agree, but with exception of housing/land objectives which have not been achieved so far.	Agreement noted. The RR recognises that there is a need to increase the supply of housing land.	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
33.2	Abergavenny Town Council	Comment	<p>With regards to housing, the range and quality of the housing provided should be reviewed as part of the LDP revision. Affordable housing can still be out of the financial reach of many in Abergavenny, so truly affordable housing is required. Good quality housing is more sustainable in the long term. Again raise the need to ensure that there is sufficient focus on the historic nature of Abergavenny as a market town. Abergavenny is fortunate to have a railway station but there is concern that improving connectivity is largely focused on moving residents to their places of work. This is important but equally would like to see greater consideration in the LDP Review process to the creation of good quality, accessible employment sites in Abergavenny to decrease the need for travel.</p>	Comments noted. These are matters to be considered in any LDP revision.	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
36.2	East Mon Industrial Holdings Ltd (WYG)	Disagree	<p>The LDP vision was developed from public participation exercises that were carried out in 2008. It is considered that the intervening period of 10 years is substantial enough to warrant a review of the vision. Furthermore, it is considered that substantial policy changes have occurred since this period. PPW requires that in accordance with the Well-Being of Future Generations Act (2015) the Local Well Being Plan should provide a framework for the LDP vision. As such, it is considered that the current vision which was prepared in the context of the Community Strategy needs to be reviewed afresh as part of the full review of the LDP. It is considered that potential “tweaking” may not be appropriate in the context of complying with the requirements of the Well-Being of Future Generations Act. In addition to the Cardiff Capital City Region Deal, it is considered that the Draft Review Report should give consideration to the far-reaching impacts of the abolition of Severn Bridge tolls in terms of capitalising on South Wales / South West linkages. It is essential that the LDP considers how the two economies of the Cardiff Capital region and the West of England can work more closely as a coherent economic region in the future (which will have clear implications for the LDP’s vision and objectives).</p>	<p>Comment noted. If a decision is made to revise the LDP, this will include revisiting the vision, issues and objectives.</p>	<p>No change to the RR.</p>



Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
37.2	Abergavenny & District Civic Society	Agree	But recognise that all three will need to be carefully reconsidered in the foreseeable future. Such a reassessment needs several years of evidence-gathering, discussion and negotiation.	Agreement and comment noted. While the existing vision, issues and objectives are still felt to be relevant and appropriate they would be reconsidered as part of any LDP revision.	No change to the RR.
39.2	Home Builders Federation	Neither Agree Nor Disagree	Suggest that this section needs to include some commentary on the City Deal and the impact of the bridge tolls being removed. (Note that these do get mentioned in later sections) . Due to Monmouthshire's strategic location in terms of the wider Severn Growth area there is also a need to include some commentary on the potential impact of being part of this is wider strategic area.	Comment noted. If a decision is made to revise the LDP, this will include revisiting the vision, issues and objectives.	No change to the RR.
40.2	Magor with Undy Community Council	Neither Agree Nor Disagree	The current LDP objectives and the Local Well-Being Plan objectives are complementary and conducive to the seven goals of the Welsh Government's Well-Being of Future Generation Act.	Comment noted.	No change to the RR.
41.2	Philippa Cole	Neither Agree Nor Disagree		Noted.	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
42.1	Stephen Arnell		Things have moved on a long way since the start of the LDP, and the LDP revision must now try to imagine what is likely in the next years and decades. It is already apparent that there will be less travelling required, certainly to places of work and for shopping, reducing the use of the private car. Working from home via the internet is now widespread. Internet shopping continues to increase, and the use of delivery drones will reduce the need for delivery vans especially to rural destinations. This evidence means that the LDP Vision in para 3.1 .1 (3) 'reduced reliance on the private motor car and minimised impact on the environment' could soon be met, NOT by having to concentrate residential development around transport links but by technology thus allowing a more balance distribution of residential development between towns and rural locations.	Comment noted. If a decision is made to revise the LDP, this will include revisiting the vision, issues and objectives.	No change to the RR.
45.2	Bovis Homes Group (Lichfields)	Neither Agree Nor Disagree	The Vision, Issues and Objectives remain laudable statements of intent, however, given the time since they were first drafted and the new national and regional policy context it is appropriate to re-test them as part of a full plan making process.	Comment noted. If a decision is made to revise the LDP, this will include revisiting the vision, issues and objectives.	No change to the RR.
46.2	Llanover & Coldbrook Estate (LRM Planning)	Disagree	The vision, issues and objectives remain relevant however will need to be updated.	Comment noted. If a decision is made to revise the LDP, this will include revisiting the vision, issues and objectives.	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
47.2	Taylor Wimpey (Turley)		No comment at this time on the proposed vision, issues and objectives.	Noted.	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
48.2	Llanarth Estates (WPM Planning)	Agree	<p>It is agreed that the issues identified in the current LDP are still relevant however there are emerging issues which should be added. The potential implications of the abolition of the tolls and its affect on the county and likely growth is considered to be a key issue going forward and should be taken into account in the future LDP. Whilst it will create is own issues it is also likely to have a direct impact on existing issues. The population is likely to increase as a result of the Severn Tolls abolition and migration from the English borders is likely to occur which will potentially increase the number of younger persons/families settling in the east of the authority due to the reduced housing prices in Mommouthshire in comparison to settlements on the English side of the Severn Bridge. Any review of the LDP should take full account of this especially in relation to potential population growth in the County. Spatial distribution of development should be reconsidered to facilitate the likely growth, especially in the east of the county. Additionally, the ability for growth in the rural main villages and minor villages should be</p> <p>facilitated to provide sustainable settlements whilst also easing pressure on main towns. Whilst the current LDP recognises the issue of maintaining</p>	<p>Comment noted. If a decision is made to revise the LDP, this will include revisiting the vision, issues and objectives.</p>	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation	
Page 217			services and facilities in rural areas it does not provide realistic policies which enable the implementation of controlled growth. The issues identified in respect to infrastructure should be amended to include the specific reference to rural areas. The issues in respect of employment do not recognise the sectors of employment and industry which dominate the County, for example, agriculture. Nor is it recognized that in light of the decline in the farming industry that alternative uses, diversification and employment opportunities need to be provided for. The lack of tourism accommodation and spatial distribution of tourism is not noted as an issue and it should be. The LDP Vision remains relevant and the principles set are encouraged and welcomed. The objectives are generally supported however those that refer to the level and range of homes, rural communities, infrastructure and the economy are considered to need updating in light of the progress of the LDP since its adoption:			
	50.2	Mrs Evelyn Birden (Newland Rennie)	Agree		Agreement noted.	No change to the RR.
	51.2	Dr David Rosser (Newland Rennie)	Neither Agree Nor Disagree		Noted	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
52.2	Morris' of Usk (WPM Planning)	Agree	<p>It is agreed that the issues identified in the current LDP are still relevant however there are emerging issues which should be added. The potential implications of the abolition of the tolls and its affect on the county and likely growth is considered to be a key issue going forward and should be taken into account in the future LDP. Whilst it will create is own issues it is also likely to have a direct impact on existing issues. The population is likely to increase as a result of the Severn Tolls abolition and migration from the English borders is likely to occur which will potentially increase the number of younger persons/families settling in the east of the authority due to the reduced housing prices in Mommouthshire in comparison to settlements on the English side of the Severn Bridge. Any review of the LDP should take full account of this especially in relation to potential population growth in the County. Spatial distribution of development should be reconsidered to facilitate the likely growth, especially in the east of the county. Additionally, the ability for growth in the rural main villages and minor villages should be facilitated to provide sustainable settlements whilst also easing pressure on main towns. Whilst the current LDP recognises the issue of maintaining services and facilities in rural areas it</p>	<p>Comment noted. If a decision is made to revise the LDP, this will include revisiting the vision, issues and objectives.</p>	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
53.2	Barton Willmore	Neither Agree Nor Disagree	<p>does not provide realistic policies which enable the implementation of controlled growth. The lack of infrastructure in rural Monmouthshire directly impacts on the settlement</p>	<p>Comment noted. It is recognised that should the strategy and its aims change in any LDP revision the vision, issues and objectives are likely to require amending to correspond.</p>	<p>No change to the RR.</p>
			<p>pattern and the implications this has in terms of delivering development, especially in rural areas. The issues identified in respect to infrastructure should be amended to include the specific reference to rural areas. The LDP Vision remains relevant and the principles set are encouraged and welcomed. The objectives are generally supported however those that refer to rural communities, infrastructure and the economy are considered to need updating in light of the progress of the LDP since its adoption:</p>		

Page 219

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
56.2	Monmouth Town Council (Late Rep)	Disagree	The LDP vision may still be relevant but major changes in the National Planning Framework remain unclear as does the real impact of the Regional plans around the Cardiff Capital Regional City Deal. Mineral planning and the impact of fracking need to be considered and this section updated as although not within our geographical boundary may impact from the neighbouring counties.	Comment noted. If a decision is made to revise the LDP, this will include revisiting the vision, issues and objectives. The Welsh Government has issued a clear policy position opposed to fracking, however, neither that nor the Monmouthshire LDP can influence the approach taken to fracking in neighbouring English authorities.	No change to the RR.
60.1	St Arvans Community Council (Late Rep)	Agree	Since current objectives have not been achieved there is little use in carrying out a full review.	Agreement noted.	No change to the RR.



## Q3 (Section 3.2): Do you agree that the adopted LDP Spatial Strategy is functioning effectively?

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
1.3	Chepstow Society	Disagree	Too much emphasis on "windfall" sites, so taking away from green spaces, gardens, etc, this cannot work long term. If supply of building land falls short of Government requirements it might mean approvals by Planning Inspectors in circumstances not currently thought desirable.	It is noted that the respondent considers that the LDP spatial strategy is not functioning effectively. The RR recognises that the spatial strategy may need revising.	RR to be amended to make a recommendation on whether or not the LDP spatial strategy needs revising and to consider the implications for the form of any LDP revision.
3.3	Trustees of the Late Mrs H M Langham	Disagree	Para 3.2 .2; states that "it would appear that in general LDP policies are functioning effectively". This is not so, specifically in main Villages, as evidenced in 3.2 .14 where it states that "only one site has been delivered to date" out of 19. 3.28 refers to the "[slow] speed at which sites allocated in the Plan are coming forward, as do 3.2.10 and 3.2 .11, which refer directly to Main Village allocations.	The RR (e.g. paras. 3.2 .14) acknowledges that there is a need to give further consideration to the reasons for the non-delivery of Main Village sites, including unrealistic landowner expectations. This could lead to de-allocation of some sites in any revised LDP.	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
4.3	Heine Planning	Disagree	<p>The Spatial strategy is clearly not working due to the failure to make proper and adequate assessment of the:</p> <p style="padding-left: 40px;">a) Need for Gypsy and Traveller pitches</p> <p style="padding-left: 40px;">b) Allocation of sites to meet existing need</p> <p style="padding-left: 40px;">To inform current policy</p>	The LDP spatial strategy is concerned more with the general distribution of development rather than with specific issues such as the need for gypsy and traveller sites, although the RR recognises that this matter will need further consideration in any LDP revision.	No change to the RR.
7.3	Mr Alan Horne	Neither Agree nor Disagree		Noted.	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
8.2	Ann Langford	Agree	<p>Considers that that LDP should not be reviewed at this stage. The spatial strategy appears to be working. The tone of the report however seems to be all about the failure of the plan to deliver the target of 450 dwellings per annum. But this target is completely unrealistic based on current population and household growth projections. The target should be based on need, which implies a level of around 200 dwellings/annum. The failure of this section of the report to acknowledge this fact is a major weakness in the report, and in the consequent conclusions. Revising the target to account for more up-to-date forecasts reveals that the current plan is delivering what is required. Figure 6 (3.2 .5) demonstrates that the dwelling completions is about on target of 200/annum. The land supply calculations using the residual method is completely invalid if this target of 450 dwellings per annum is used.</p>	<p>It is noted that the respondent considers that the LDP spatial strategy is functioning effectively. Concern is expressed, however, that the RR does not suggest that the housing target needs to be reduced to conform to more recent projections. To state this would be to prejudge a matter that should be dealt with in any LDP revision. The RR acknowledges the fact that the recent population and household projections are indicating reduced numbers to those that the LDP was based on and that this suggests a need to reconsider the LDP's strategy's level of housing growth. However, the appropriateness, or otherwise, of the more recent Welsh Government population and housing projections will be an issue to be considered in any LDP revision.</p>	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
9.3			The 60% affordable housing contribution is excessively high for lower tier settlement allocations. There is a significant need and priority to deliver affordable housing within Monmouthshire, but need to reconsider the percentage required for exception sites. With a reduction in the requirement for affordable housing improving the viability of such sites coming forward it would enable more development to meet local housing need and supply within the main villages.	The RR acknowledges (para 3.3 .8) that there is a need to consider revisions to the rural housing policies and/or how they are implemented, although within a general context that the primary aim of the Main Village allocations is to make provision of affordable housing for local people living in the rural parts of the County.	No change to the RR.
9.3	SA Brain & Co Ltd	Neither Agree nor Disagree	There has been a failure of strategic sites to deliver as anticipated which has led to an under provision of housing during the first part of the plan period, this has been masked by a significant number of windfalls. The Spatial Strategy has failed due to its overreliance on the delivery of the Strategic Sites. This over-reliance together with insufficient flexibility in the LDP to allow for other sources of housing to come forward has led to a shortfall of completions.	It is noted that the respondent considers that the LDP spatial strategy is not functioning effectively. The RR recognises that the spatial strategy may need revising.	RR to be amended to make a recommendation on whether or not the LDP spatial strategy needs revising and to consider the implications for the form of any LDP revision. RR to be amended to acknowledge that there is an overreliance on strategic sites and associated lack of flexibility in the adopted LDP.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
9.3			<p>Paragraph 3.2.20 states that due to the inability to meet the LDP housing requirement and the resulting failure to maintain a 5 year housing land supply, the level of housing growth will have to be reconsidered as part of the revision to the LDP. In doing this, it should be recognised that the failure to deliver the housing strategy is not due to a lack of demand or need for housing in Monmouthshire but due to the over reliance on strategic sites which have failed to come forward for development and whatever the housing target in the LDP Review there should be sufficient flexibility in the land supply to ensure that the target is met. Commend the Council in taking a pragmatic approach in approving two recent residential planning applications it is felt that such an approach should be adopted to other housing sites that have the potential to deliver immediately within sustainable locations. Also agree that all the undelivered housing allocations need to be re-assessed to ensure that they remain viable and deliverable and that this could result in existing housing allocations being removed from the LDP and new sites allocated.</p>	<p>Comments noted, although it is not agreed that the reliance on strategic sites is the sole reason for the housing targets not being met. There is a need to consider whether the targets are appropriate in the light of, for example, the more recent Welsh Government population and household projections, the methodology for calculating a 5-year housing supply and past building rates. These will be matters to be considered in any LDP revision.</p>	<p>RR to be amended to make a recommendation on whether or not the LDP spatial strategy needs revising and to consider the implications for the form of any LDP revision.</p>

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
9.3			Consider that Land adjacent to the Piercefield, St Arvans, is a suitable site as an allocation for the LDP Review to provide and support the strategic allocations in terms of providing a range of different locations that are also viable. Housing to meet local needs within lower tier settlements, within the local plan, is provided for via exception sites (Policy S4 and H7) where such schemes could come forward with a high percentage of affordable housing provision. There has been a lack of delivery in these exception sites due to viability issues. The approach to the affordable housing exception sites needs to be reconsidered and an element of flexibility applied.	The suitability, or otherwise, of any potential candidate site will be a matter to be considered in any LDP revision.	No change to the RR.
11.26	Mr Paul Cawley	Disagree	The current LDP is too reliant on the spatial development of the larger 'main town' developments. The Authority needs to consider the development of smaller 'secondary' and 'rural' areas. Land available (new, or that which missed inclusion in, or rejected by the current LDP) should be considered to cover any shortfall in the number of houses required across the whole of Monmouthshire.	It is noted that the respondent considers that the LDP spatial strategy not functioning effectively. The RR recognises that the spatial strategy may need revising.	RR to be amended to make a recommendation on whether or not the LDP spatial strategy needs revising and to consider the implications for the form of any LDP revision

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
12.3	RPS Planning	Agree	Support provided to strategy of focusing the delivery of development within the three main market towns but it is clear from the 2016 and 2017 Annual Monitoring Reports that despite housing sites being allocated, a shortfall in housing land supply has still occurred. The LDP review not only needs to support the delivery of allocated sites which are proven to be suitable and deliverable but also allocate further housing sites which are free of constraint and are realistically viable and deliverable. The LDP review needs to not only accommodate the future projected population and housing growth requirements over the plan period but also factor in the current undersupply due to allocated sites not coming forward at the expected rates. The current slower than anticipated delivery evidenced within the 2016 and 2017 AMR's confirms the need for additional allocations through the LDP review.	It is noted that the respondent supports the current LDP spatial strategy, the main concern appearing to be the need for additional sites that accord with this spatial strategy. The RR acknowledges a need for additional housing sites. The level of housing growth required will be a matter to be considered in any LDP Revision, although it is not necessarily agreed that any current undersupply should be factored into any revised LDP targets, which, it is believed, should start afresh from the base date of any new plan, taking into account need as it stands at that start date.	RR to be amended to make a recommendation on whether or not the LDP spatial strategy needs revising and to consider the implications for the form of any LDP revision

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
13.3	Ward Estates Ltd	Neither Agree nor Disagree	Agree that in relation to those dwellings that have been completed to date the LDP spatial strategy in broad terms is being followed. However this has occurred despite there being a failure of strategic sites to deliver as anticipated which has led to an underachievement in Severnside Settlements whilst in the Main Towns a significant number of windfalls has made up for the non-delivery of strategic sites leading to an over achievement of the spatial strategy. Failure of the Spatial Strategy in relation to housing delivery due to overreliance on the delivery of the Strategic Sites this together with insufficient flexibility to allow for non-delivery has led to a shortfall of completions.	It is noted that the respondent considers that the LDP spatial strategy is not functioning effectively. The RR recognises that the spatial strategy may need revising. It is not agreed that the reliance on strategic sites is the sole reason for the housing targets not being met. There is a need to consider whether the targets are appropriate in the light of, for example, the more recent Welsh Government population and household projections, the methodology for calculating a 5-year housing supply and past building rates. These will be matters to be considered in any LDP revision.	RR to be amended to make a recommendation on whether or not the LDP spatial strategy needs revising and to consider the implications for the form of any LDP revision. RR to be amended to acknowledge that there is an overreliance on strategic sites and associated lack of flexibility in the adopted LDP.



Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
13.3			<p>Para 3.2 .20 states that due to the inability to meet the LDP housing requirement and to maintain a 5 year housing land supply the level of housing growth will have to be reconsidered as part of the revision to the LDP. In doing this it should be recognised that the failure to deliver the housing strategy is not due to a lack of demand or need for housing in Monmouthshire but due to the over reliance on strategic sites which have failed to come forward for development. The suggestion in para.3.2 .17 that if past building rates were used to determine the land supply instead of the residual method it would result in a 11 year supply of housing land is totally inappropriate as this would result in the continual under supply of housing provision to meet the LDP requirement.</p>		
13.3			<p>Commend the Council in taking a pragmatic approach in approving two recent residential planning applications, Iso agree that all the undelivered housing allocations will need to be reassessed to ensure that they remain viable and deliverable and that this could result in existing housing allocations being removed from the LDP and new sites allocated. With regard to new sites consider that the land shown on submitted plan should be included as an allocation in the LDP Review.</p>	<p>The suitability, or otherwise, of any potential candidate site will be a matter to be considered in any LDP revision.</p>	<p>No change to the RR.</p>

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
15.3	Bovis Homes (RPS)	Agree	Whilst support the Spatial Strategy and focusing the delivery of development within the three main market towns , it is clear from the 2016 and 2017 Annual Monitoring Reports that despite housing sites being allocated, a shortfall in housing land supply has still occurred. As such, the LDP review not only needs to support the delivery of allocated sites which are proven to be suitable and deliverable, including those which have an already proven track record for delivering housing but also allocate further housing sites which are realistically viable and deliverable.	It is noted that the respondent supports the current LDP spatial strategy, the main concern appearing to be the need for additional sites that accord with this spatial strategy and for assisting existing allocations to come forward. The RR acknowledges a need for additional housing sites.	RR to be amended to make a recommendation on whether or not a LDP revision should take place and, if so , whether it should be a short form revision or a full revision.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
15.3			<p>In terms of the future level of Housing Growth, the LDP review needs to not only accommodate the future projected population and housing growth requirements over the plan period but also factor in the current undersupply due to allocated sites not coming forward at the expected rates. The current slower than anticipated delivery evidenced within the 2016 and 2017 AMR's confirms the need for additional allocations through the LDP revision. It is also considered that the 2014 populations projections cannot be relied upon within the LDP review. Due to the length of the plan period (up to 2036), the 2014 population projections will be out of date to cover the next 18 years. Accordingly, the evidence base used to revise the dwelling requirement over this extended time will have to be carefully considered with enough flexibility included to allow for any changes in circumstances. In addition the housing requirement also needs to consider regional dynamics and the possibility of extending the "duty to cooperate" to the west of England.</p>	<p>The level of housing growth required will be a matter to be considered in any LDP Revision, although it is not necessarily agreed that any current undersupply should be factored into any revised LDP targets, which, it is believed, should start afresh from the base date of any new plan, taking into account need as it stands at that start date.</p>	<p>No change to the RR.</p>

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
16.3			<p>A significant proportion of dwelling completions in the main towns have arisen from windfall sites. Windfall sites are unlikely to deliver affordable housing at levels that allocated strategic sites will achieve, and this in part is likely to be a contributory factor to the affordable housing delivery deficiencies in the County. The one LDP strategic housing allocation that is proposed at Chepstow comprises contaminated, previously-developed land and consequently it is not expected to deliver affordable housing anywhere near the target level exacerbating the problem of affordable housing delivery in the town.</p>		

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
16.3			<p>The Review Report suggests that the level of housing growth required by the LDP's strategy will need to be considered as part of a revision of the LDP. However, strongly caution against any short term (eg. through a short form revision) re-adjustment downwards, as affordability will become a greater problem in Monmouthshire if supply is curtailed. The only effective way to address the difficulties that the the Plan has faced in delivering sufficient housing is to allocate additional strategic sites, particularly at towns such as Chepstow where housing demand is likely to increase as the Severn Bridge tolls are phased out, and new economic opportunities arising from initiatives such as the South East Wales Metro. This should take place through a full revision of the Plan.</p>		
16.3			<p>As a consequence of limited delivery from allocated strategic housing sites, Monmouthshire has not achieved a 5-year supply of land for housing for the years 2015/16 and 2016/17. The residual method for calculating housing land availability/supply set out in TAN1 is of course current policy and the (only) accepted method for delivering the requirement to maintain a 5-year supply of readily developable housing land.</p>		

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
16.3			Affordable dwelling completions are significantly lower than the identified LDP target, do not believe that the LDP's affordable housing requirement will be met by the end of the current Plan period.		
16.3	Bovis Homes (Walsingham Planning)	Neither Agree Nor Disagree	The spatial strategy in the adopted LDP correctly seeks to focus the majority of residential development in the County's main towns with a smaller amount of new housing development provided within the Severnside area and Rural Secondary Settlements. It is evident that the spatial distribution of growth to date is broadly in accordance with the planned percentage distribution as set out in Policy S2. However, the delivery of housing to meet the adopted housing requirement is also a key element of the spatial strategy. It is clear from the evidence in the Review Report that the spatial strategy is not functioning effectively, particularly with regards to affordable housing.	It is noted that the respondent supports the LDP spatial strategy, the main concern appearing to be the need for additional sites that accord with this spatial strategy. The RR acknowledges a need for additional housing sites. The level of housing growth required will be a matter to be considered in any LDP Revision. The suitability, or otherwise, of any potential candidate site will be a matter for any LDP Revision.	RR to be amended to make a recommendation on whether or not the LDP spatial strategy needs revising and to consider the implications for the form of any LDP revision

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
16.3			There has been limited progress with the delivery of the allocated strategic housing sites. The Review Report recognises that the delivery of strategic sites is a crucial element in the delivery of the housing strategy. We agree and see no justification in reviewing the deliverability of outstanding strategic allocations. However, the fact that for various reasons they are taking longer to come forward means that additional sites will need to be identified as part of a full revision of the LDP.		
20.3	Hallam Land Management (Asbri)	Disagree	The inability to meet the adopted LDP's housing requirement and the resulting failure to maintain a 5 year housing land supply against the prescribed residual method should not be used as a reason to reduce future levels of housing growth on the basis of past building rates as this ignores low delivery rates experienced during the last 10 to 15 years which reflected factors which included the recession, and the limited choice of sites available in the years prior to the adoption of the LDP. The pragmatic approach in allowing recent planning applications is welcomed. In addition the Council's flexibility in relation to viability and affordable housing reduction as highlighted in paragraphs 3.3 .6 to 3.3 .7 is supported.	Comment noted. The level of any future housing growth will be a matter to be considered in any LDP revision.	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
21.3	Hallam Land Management (Boyer)	Neither Agree nor Disagree	Agree that in relation to dwellings completed to date the LDP Spatial Strategy in broad terms is being followed. However, this has occurred despite there being a failure of Strategic Sites to deliver as anticipated which has led to an underachievement in Severnside Settlements, whilst in the Main Towns, a significant number of windfalls has made up for the non-delivery of Strategic Sites leading to an over achievement of the spatial strategy. The over-reliance on strategic sites together with insufficient flexibility in the LDP to allow for non-delivery has led to a shortfall of completions.	It is noted that the respondent considers that the LDP spatial strategy is not functioning effectively. The RR recognises that the spatial strategy may need revising. It is not agreed that the reliance on strategic sites is the sole reason for the housing targets not being met. There is a need to consider whether the targets are appropriate in the light of, for example, the more recent Welsh Government population and household projections, the methodology for calculating a 5-year housing supply and past building rates. These will be matters to be considered in any LDP revision.	RR to be amended to make a recommendation on whether or not the LDP spatial strategy needs revising and to consider the implications for the form of any LDP revision. RR to be amended to acknowledge that there is an overreliance on strategic sites and associated lack of flexibility in the adopted LDP.
21.			The failure to deliver the housing strategy is not due to a lack of demand or need for housing in Monmouthshire but due to the over reliance on Strategic Sites which have failed to come forward for development and whatever the housing target in the LDP Review there should be sufficient flexibility in the land supply to ensure that the target is met. The suggestion in paragraph 3.2 .17 that if past building rates were used to determine the land supply instead of the residual method, resulting in a 11 year supply of housing land, is totally inappropriate as this would result in the continual under supply of housing provision to meet the LDP requirement.		



Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
21.3			Commend the Council in taking a pragmatic approach in approving two recent residential planning applications to make up the shortfall in the housing land supply. Also agree that all the undelivered housing allocations will need to be reassessed to ensure that they remain viable and deliverable and that this could result in existing housing allocations being removed from the LDP and new sites allocated. In this regard, consider that the Land West of Rockfield Road1 should be included as an allocation in the LDP Review.	The suitability, or otherwise, of any potential candidate site will be a matter to be considered in any LDP revision.	
22.3	Redrow Homes	Agree	The spatial strategy adopted in the LDP is considered to have been robust and effective. Looking forward the impact of the removal of the Severn bridge toll costs need to be carefully considered together with SDP progression, city deal etc. Consideration will need to be given to the increased demand for housing and fluidity of movement for employers and employees.	It is noted that the respondent supports the LDP's existing spatial strategy. The issues referred to will be taken into account in any LDP revision.	RR to be amended to make a recommendation on whether or not the LDP spatial strategy needs revising and to consider the implications for the form of any LDP revision

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
23.3	Richborough Estates (Turley)	Neither Agree Nor Disagree	<p>Whilst the principles of the spatial strategy are broadly supported, the delivery of housing to date indicates that there is a need to adopt greater flexibility and identify additional site allocations. Strategic sites identified through the LDP have, in the main, failed to progress at the rates anticipated. The failure to balance housing supply with demand over the plan period is a result of a number of factors. It is accepted that this goes beyond the spatial strategy alone. The current housing supply position does, however, support the need to review the spatial strategy, it should provide greater flexibility in relation to land identified and allocated in the LDP. The Council's approach to the interim supply of housing demonstrates the benefits of adopting flexibility to boosting the delivery of housing land. In terms of the spatial strategy, there is scope for increased delivery within the Rural Secondary Settlements, whilst maintaining a focus on the three main towns. It is also important that the spatial strategy is reviewed in respect of both the extended plan period and contextual changes since the adoption of the LDP. This should include consideration of the implications of factors such as the aspirations associated with the Cardiff Capital Region City Deal and opportunities associated with the abolition of the Severn Tolls.</p>	<p>It is noted that the respondent considers that the LDP spatial strategy is not functioning effectively, although there is also concern that the delivery of housing land is inadequate. The RR recognises that the spatial strategy may require revising and that additional housing allocations are required.</p>	<p>RR to be amended to make a recommendation on whether or not the LDP spatial strategy needs revising and to consider the implications for the form of any LDP revision</p>

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
24.3	Mrs Carolyn Ovenden	Neither Agree Nor Disagree	<p>As a review is deemed necessary, the Spatial Strategy cannot be functioning effectively. The original LDP was flawed by not considering possible changes in the housing market and the wider economy before allocating development sites. Site viability should have been taken into account and perhaps a penalty introduced for undelivered site allocations. The number of houses allocated to be built on any one site (together with statutory numbers of affordable housing) should be enforced. As not all allocated sites are being developed, it is cavalier of the Council to state that it will select other sites - ostensibly at will. This poses a huge threat to the green wedges which give Monmouthshire its character and refutes the statement in the summary that Policy S13 is functioning effectively. It will be also be detrimental to the tourist industry.</p>	<p>Comments noted. These are matters generally to be considered in any LDP revision.</p>	<p>RR to be amended to make a recommendation on whether or not the LDP spatial strategy needs revising and to consider the implications for the form of any LDP revision.</p>

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
26.3	Cllr Louise Brown	Agree	<p>Agree, except far more emphasis should be placed upon getting the population projections right. Opposed to additional sites being considered as current allocated sites should be left where they are and reviewed properly. If there is a lower population projection then the current sites should be sufficient without the need to consider any additional sites. In relation to main villages it is very important to maintain the village boundaries and not to extend them. The policy of having a maximum of 15 in relation to the main villages was ignored in relation to one site on Pwllmeyric Hill. The policy needs to be drafted in such a way to ensure that this includes any land in the vicinity of the site, otherwise the policy of a maximum number of 15 is meaningless and leads to overdevelopment in main villages. It may be that other factors such as the percentage of affordable houses in main villages is too high and possibly 50% rather than 60% should be considered, this needs to be properly reviewed rather than looking for any unnecessary additional sites. It is important that affordable housing is provided on site not as an offsite contribution as this does not help with the needed provision in the main villages.</p>	<p>Comments noted. Reducing the housing target could only be done through a revision to the LDP. The appropriateness, or otherwise, of the more recent Welsh Government population and housing projections will be an issue to be considered in any LDP revision. The DDR does highlight (reflecting the findings of the last two LDP Annual Monitoring Reports) a need for identifying additional housing sites, contrary to the views expressed by the respondent. This is considered sufficient reason to justify a revision of the LDP. The location and scale of any new housing allocations would be a matter for any LDP revision. With regard to the comment on the Main Village affordable housing policy, the RR acknowledges (para 3.3 .8) that there is a need to consider revisions to the rural housing policies and/or how they are implemented, although within a general context that the primary aim of the Main Village allocations is to make provision of affordable housing for local people living in the rural parts of the County. The detailed wording of the affordable housing policy is a matter that can be considered in any LDP review.</p>	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
28.3	Llangybi Community Council	Disagree	Given the results so far, it is difficult to understand the statement that the residential development in Main Villages is 'functioning effectively' (Appendix 1, Table 2). Any proposal to introduce new housing sites (as per 3.3 .20) needs a full-scale consultation including WAG Inspectorate hearings especially if changes to VDBs (Village Development Boundaries) are to be proposed.	The respondent appears to be referring to the comment on Policy H2, Residential Development in Main Villages. This is a general Policy that is considered to be operating effectively but the RR does identify that there are issues with Policy SAH11 in that Main Village allocations are slow in coming forward. In this respect, the RR acknowledges (para 3.3 .8) that there is a need to consider revisions to the rural housing policies and/or how they are implemented, although within a general context that the primary aim of the Main Village allocations is to make provision of affordable housing for local people living in the rural parts of the County. Any changes to village development boundaries will be subject to community consultation as part of any LDP revision.	No change to the RR.
31.3	Mr Adrian Lewis	Neither Agree Nor Disagree	So long as any build respect the right of individual privacy, particularly any new build adjacent to existing developments.	Comment noted.	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
32.3	Mr Rees Williams	Disagree	In terms of housing /land objectives these are not being achieved. In Table 1 Main Towns -Spatial Distribution of Housing Growth, the % Housing Growth Achieved is based on projected figures not actual completions and is , therefore, much lower in real terms.	It is noted that the respondent considers that the LDP spatial strategy is not functioning effectively, particularly in relation to housing supply. The RR recognises that there is a need to increase the supply of housing land. To clarify Table 1 shows sites with extant planning permission for residential use at 29/11/2017 and residential completions 01/04/2011-31/03/2017.	RR to be amended to make a recommendation on whether or not the LDP spatial strategy needs revising and to consider the implications for the form of any LDP revision

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
33.3	Abergavenny Town Council	Comment	<p>The lower number of dwelling completions could be construed as the LDP not functioning effectively but appreciate that the decisions of developers is outside of the remit of the Planning. Would request that the affordable housing threshold of 35% on new sites in the main towns is strictly adhered to and that developers are not able to meet the requirement with off-site contributions. Somewhat confused that allocations for housing are made in the plan yet large windfall sites make up the majority of completions in the main towns – why are these windfall sites not identified as part of the LDP process? Residential development via windfall sites undermines the reason for identifying sites in an LDP. Welcome the strengthening of retail policies to ensure the continuation of a vibrant and viable town centre. Note the reference to a Retail Expenditure Forecasts Study. Is this broken down by town and if so is this something that can be shared with the Town Council and local Business Community?</p>	<p>Comments noted. With regard to the point about affordable housing percentages, further viability testing will need to be carried out as part of any LDP revision to ensure that affordable housing policy requirements are based on up to date information on development costs and values. The Retail Expenditure Forecasts Study can be made available to the Town Council.</p>	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
34.2	Barratt David Wilson Homes		Paragraph 3.2 .20 suggests that existing housing allocations will not be carried over to the next LDP without re-assessment of their viability and deliverability. Supportive of this approach and consider that new and deliverable sites should be brought forward in place of these stalled sites which are having a detrimental impact upon the Council's housing land supply.	Comment noted. The RR acknowledges that there is a need to consider new housing allocations and to re-assess undelivered housing allocations.	No change to the RR.
34.2			Paragraph 3.2 .9 identifies protracted viability discussions between developers and the Local Planning Authority as one of the reasons for reduced housing delivery in the County. In order to combat this greater emphasis needs to be placed upon the viability and deliverability of sites at the LDP stage in order to ensure that the most appropriate and deliverable sites are progressed as residential allocations.	Comment noted. These are matters to be considered in any LDP revision.	No change to the RR.
34.2			In terms of the delivery of affordable housing, welcome the increase in ACG figures (which will have a positive impact upon the delivery of affordable housing) it should be recognised that tenure neutral housing has a major impact upon overall viability and the percentage of affordable housing that is capable of being delivered. Through the LDP Review process, a thorough and robust review should be undertaken of the affordable housing requirement in Monmouthshire.	Comment noted. The DDR (para. 3.3 .7) acknowledges that further viability testing will need to be carried out as part of any LDP revision to ensure that affordable housing policy requirements are based on up to date information on development costs and values.	No change to the RR.



Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
36.3	East Mon Industrial Holdings Ltd (WYG)	Disagree	<p>It is considered that in order to address the under-supply of housing in the County, the spatial strategy must be revisited as part of the LDP review, particularly in light of the extended plan period. The need to reassess the spatial strategy is further emphasised by the potential implications of the removal of bridge tolls and the impending further increase in pressure on housing land, particularly in the south/east of the County. It is not considered that a sufficient amount of deliverable housing land is available within the existing settlement boundaries of the main towns / Severnside Settlements to accommodate the scale of new allocations required, necessitating a review of settlement boundaries and countryside/green wedge designations accordingly. Windfall sites within the main towns are already contributing a significant proportion of completions and in light of the above, it is considered that additional land needs to be released for housing on land adjacent to the main towns. It is considered that utilising wider economic/market conditions to justify the under-performing housing land supply position, underplays the fact that the LDP housing allocations are not coming forward for development and are essentially undeliverable. Conversely the adjoining Authority of Newport, which has experienced comparable</p>	<p>It is noted that the respondent considers that the LDP spatial strategy is not functioning effectively. The RR recognises that the spatial strategy may need revising. The RR also acknowledges that there is a need to consider new housing allocations and to re-assess undelivered housing allocations. It is not agreed that the LDP strategic sites are 'essentially undeliverable' and an analysis of the progress of these sites does not evidence that version. All the LDP strategic sites are being developed or coming forward for development, although the RR acknowledges that this is taking place more slowly than is desirable.</p>	<p>RR to be amended to make a recommendation on whether or not the LDP spatial strategy needs revising and to consider the implications for the form of any LDP revision</p>

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
			economic/market conditions, has maintained its five year housing land supply. Non delivery of allocated sites evidences the need for the Authority to flexibly permit housing on non-allocated sites that are otherwise acceptable in planning terms. Agreed necessary to reassess existing allocations and in addition to undertake a comprehensive reassessment of the spatial strategy including release of land outside settlement limits / potential de-allocation of green wedge land to address the current and potentially worsening housing supply position.		
37.	Abergavenny & District Civic Society		The draft Review provides limited evidence to assess this. Further analysis on a town-by-town basis is needed. Abergavenny and Llanfoist were expected to contribute 811 extra dwellings (16%) of the LDP provision of 4,957 for the county. 16% of the revised 2011-2021 need for 2,400 would be only 384. We estimate that around 300 have been completed since 2011, and the current availability, including assumptions about Tudor Street and some infilling opportunities, is about 600. Any pressing need to allocate more sites for housing may be even less than in other parts of the county.	Comment noted. The respondent makes reference to a 'revised need' based on the most recent Welsh Government projections. This would be a matter to be considered in any LDP revision. The most recent projections are not the only factors to be considered in establishing any revised housing targets and it should not be taken for granted that they will be unreservedly taken on board in any revised LDP.	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
39.3			Para. 3.2 .18 Factors affecting housing delivery and land supply have been discussed at length, however misses one of the most important ones, the fact that allocated sites, many owned by the Council, have not come/been brought forward as quickly as planned.	Para. 3.2 .18 This point is not understood. The paragraph is highlighting that the reasons for sites not coming forward is a result of a number of factors in combination.	
39.3			Para. 3.2 .20 The inability to meet the adopted LDP's housing requirement and the resulting failure to maintain a 5 year housing land supply are not in themselves a reason to reconsider the level of housing growth. The 5 year land supply as set out in TAN1 is only a monitoring tool it does not affect either the need for or the delivery of homes.	Para. 3.2 .20 This is considered to be a reasonable point to make in the RR - the current housing supply problems do suggest that housing targets need to be re-considered to assess if they are appropriate or not. This would be a matter to be addressed in any revised LDP, along with consideration of the need for any additional housing allocations.	
39.3			<p>Para. 3.2 .15 Table 2 the column showing past build rates should be removed as it is not a calculation method allowed by TAN1 so serves no purpose in the document.</p> <p>Para. 3.2 .17 Contend that this is not the appropriate document in which to challenge the WG guidance in TAN1 on 5 year land supply calculations and that section 3.2 .17 should be removed.</p>	Paras. 3.2 .15-17 Not agreed. It is considered to be reasonable to highlight difficulties being caused by the method of calculating 5-year land supply, a matter that needs to be addressed at government level and in forthcoming LDP revisions of Welsh LPAs.	
39.3			Paras. 3.2 .11 – 3.2.13 – HBF suggests that an appendix be included to show the breakdown of where affordable housing has been delivered.	Paras. 3.2.11 - 3.2 .13 This information is considered to be excessive detail for the RR. Information on affordable housing achievement is set out in the AMRs and in para 3.3 .6 of the RR.	

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
39.3			Para. 3.2 .10 Question whether there is any evidence to support the statement that there is enough land allocated and with planning permission to achieve a 5 year land supply, remembering that any such planning permissions need to be 'implementable'.	Para. 3..2.10 This statement is factually correct.	RR to be amended to make a recommendation on whether or not the LDP spatial strategy needs revising and to consider the implications for the form of any LDP revision.
39.3			Para. 3.2 .8 Table 4 Appendix 1 should include details of the land ownership of the sites. The text should also include an explanation that a number of the Strategic sites are in Council ownership and their progress has been delayed by the Council.	Para. 3.2 .8 It is not considered necessary to include any further analysis of the reasons for the delay in strategic sites coming forward. This is expanded on in the Annual Monitoring reports.	
39.3			Paras 3.2 .6- 3.2 .9 In terms of the number of homes delivered a comparison with Newport a neighbouring Authority should be made as they have maintained a five year land supply. Their plan has the same start date 2011 and was adopted a year later than Monmouth and has delivered 1823 units or 911 units per year over the two years since the plans adoption.	Paras 3.2.6 - 3.2.9 Comments noted. The reasons for the differences between housing delivery in Monmouthshire and Newport will be set out in the RR.	The reasons for the differences between housing delivery in Monmouthshire and Newport will be set out in the RR.

Page 248

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
39.3			Para. 3.2 .5 Questions the relevance of build rates over the last 35 years, if this section is to be retained greater explanation needs to be given as to the factors influencing the figures rather than just referring to economic trends, for example the number of house builders and the shift from homes being built by SME's and Councils to a higher reliance on a smaller number of larger house builders.	Para.3.2.5 It is considered reasonable to highlight the fact that the current LDP housing targets considerably exceed past build rates in the County. The implications of this will be a matter to be addressed in any revised LDP, although it is recognised that this will be one of many factors influencing potential housing targets.	
39.3	Home Builders Federation	Neither Agree Nor Disagree	Para. 3.2 .1 Suggest that additional commentary is required with regard to the impact of the removal of the bridge tolls, as this is likely to have an impact on demand for housing particularly in the east of the County.	Para 3.2 .1 The DDR points out the issues arising from the removal of Severn Bridge tolls. Detailed assessment of their potential impact would be a matter for any LDP review.	RR to be amended to make a recommendation on whether or not the LDP spatial strategy needs revising and to consider the implications for the form of any LDP revision.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
39.3			<p>Para. 3.2.9 Consider that the report gives an unbalanced view of the factors at play, the economy has been out of recession for a number of years and an adjacent authority (Newport) which has seen a significant number of homes being delivered. In terms of viability negotiations with developers delaying sites this is partially as a result of the policies within the plan setting targets which make sites unviable or S106 requests which exceed those accounted for in the plans viability assessments. A detailed study of the viability issues of delayed sites should be undertaken to establish whether or not the plan can be amended in any way to reduce the likelihood of them being needed and therefore help speed up delivery.</p>	<p>Para. 3.2.9 All the LDP strategic sites are being developed or coming forward for development, although the RR acknowledges that this is taking place more slowly than is desirable. Careful consideration has been given to the viability implications of Section 106 requirements on planning applications for strategic sites and where necessary affordable housing policy requirements have been relaxed (although full policy requirements have been achieved in many cases as highlighted in para. 3.3 .6 of the RR) or other section 106 requests reduced. It is not agreed, therefore, that delays are ' as a result of the policies within the plan setting targets which make sites unviable or S106 requests which exceed those accounted for in the plans viability assessments', although it is recognised that any site allocations in any revised LDP will need much more rigorous examination of their deliverability, having regard to policy requirements.</p>	

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
40.3	Magor with Undy Community Council	Disagree	<p>The current LDP is too reliant on the spatial development of the larger ‘main town’ developments and that of the ‘Sevenside’ area. Need to consider land now available in secondary or rural areas so that small to medium size development clusters eg 10 – 20 dwellings can be built where a percentage of affordable housing would allow the younger generation to remain in the area they were brought up in, and possible close to family. Currently appears that large landowners/developers put forward areas of land for development and inclusion in the LDP but may not have any intention of developing that land during the lifespan of the current LDP eg. Bovis Homes submitted 225 dwellings at Vinegar Hill, Undy which is included in the Sevenside Spatial development – part of the proposed site they do not even own at present. Need to ask how long will it take to negotiate the purchase of the land, consult under the new Wales Planning Law, submit planning, agree s.106 etc? Would this all be achieved within the LDP lifespan? Need to re-consider the ‘Residential Site Allocation – General Matters Strategic Sites’ the ‘Strategic Policy 3 Strategic Housing Sites’ and the ‘Development Management H1’.</p>	<p>It is noted that the respondent considers that the LDP spatial strategy is not functioning effectively. The RR recognises that the spatial strategy may need revising.</p>	<p>RR to be amended to make a recommendation on whether or not the LDP spatial strategy needs revising and to consider the implications for the form of any LDP revision.</p>

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
41.3	Philippa Cole	Disagree	The spatial strategy places a great deal of emphasis on the delivery of strategic sites within the plan period. These have not come forward for a variety of reasons but in part due to the spatial proximity of the allocated sites in the southern part of the borough. The Rural Area is currently meeting its target in restrictive circumstances suggesting demand for sites in these areas particularly from small and medium sized developers that the Welsh Government is keen to engage in the LDP process.	It is noted that the respondent considers that the LDP spatial strategy is not functioning effectively. The RR recognises that the spatial strategy may need revising.	RR to be amended to make a recommendation on whether or not the LDP spatial strategy needs revising and to consider the implications for the form of any LDP revision



Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
42.2	Stephen Arnell	Disagree	<p>Paras 3.2 .1 and 3.2 .2 still accept that the strategy aim of focussing the majority of residential development in the main towns 'where there is best access to services and transport' is still valid. This is despite the already overwhelming evidence that the private motor car will soon not be a problem and that a lot of services will be able to be delivered in a different way reducing the need for the individual to travel. 3.2 .1 goes on to say 'with some development in the main villages only in order to meet local affordable housing need.' This needs to be re-addressed as it is now possible in the light of the above evidence to re-distribute housing to the more rural locations and villages which will give more choice. This is particularly important in villages with a school if the school is to be supported. The older generations are living longer it is essential that villages are allowed to grow and to maintain the inter-generational mix.</p>	<p>Comments noted. It is noted that the respondent considers that the LDP spatial strategy is not functioning effectively. The RR recognises that the spatial strategy may need revision.</p>	<p>RR to be amended to make a recommendation on whether or not the LDP spatial strategy needs revising and to consider the implications for the form of any LDP revision</p>

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
42.3	Stephen Arnell		<p>Abolishment of Severn Bridge Tolls is likely to be one of the biggest issues affecting the LDP and its aspirations to improve life for those in Monmouthshire, but gets little mention and no analysis. Whilst it is mentioned in para 2.2.16, it is only in the context of impacts on house prices. Would assume that the removal of the tolls was in part to encourage inward investment into Monmouthshire. The opportunity must be fully grasped in order to improve the employment opportunities and housing aspirations of present and future generations and to meet the requirements of the LDP Vision, the Well-being of Future Generations Act, 2015 and the Housing (Wales) Act, 2014. In order to achieve this, businesses must be encouraged to locate in Monmouthshire and this will not happen unless there is a mix of housing types and locations both urban and rural. The insistence on urban densities of 30 dwellings per hectare in village locations is a flawed requirement. It stifles choice, and this along with the 60% requirement for affordable housing adds to the problems of viability. Nationally population is growing and Monmouthshire should take its share.</p>	<p>Comments noted. These are matters to be considered in any LDP revision.</p>	<p>No change to the RR.</p>

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
45.3	Bovis Homes Group (Lichfields)	Agree	<p>The LDP spatial strategy does seem to have functioned effectively by directing growth primarily to higher order settlements. Consider it important that the new LDP continues to allow for housing growth within the Severnside settlements, including Magor / Undy, in order to ensure alignment between the Plan's economic and housing strategies. This will be particularly important given the future abolishment of Severn Bridge tolls and City Deal which may alter the level of housing demand in this area as well as the existing travel patterns of residents. These are key opportunities for Monmouthshire and should be taken into account when considering the spatial strategy for the new LDP Review.</p>	<p>Agreement noted. It is noted that the respondent considers that the LDP spatial strategy is functioning effectively although the RR recognises that the spatial strategy may need revising.</p>	<p>RR to be amended to make a recommendation on whether or not the LDP spatial strategy needs revising and to consider the implications for the form of any LDP revision</p>

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
46.3	Llanover & Coldbrook Estate (LRM Planning)	Disagree	Note that development so far has broadly been in line with the spatial distribution of allocations. However, there are a few notable trends including the comparative lack of sites coming forward in rural areas and the reliance on windfall sites to provide short term supply given the lead in times for larger sites. This is set against the backdrop of the overarching shortfall in delivery and housing land supply. It is unlikely that the overarching spatial strategy would change significantly. However, it will need to be refined in order to address the issues with growth being encouraged in a range of settlements in order to provide an appropriate and deliverable supply of land for housing and avoid reliance upon windfall sites. Note that the list of settlements where growth is to be encouraged is likely to need to increase to ensure a robust supply pool, indeed, settlements where there has been no provision of housing are disadvantaged in terms of their ability to meet basic needs. Furthermore there may have been changes to settlements that would have improved their level of sustainability, for instance at Llanover there is now a village shop which would improve its sustainability performance.	It is noted that the respondent considers that the LDP spatial strategy is not functioning effectively. The RR recognises that the spatial strategy may need revising. The suitability, or otherwise, of any potential candidate site or of any village to accommodate development will be matters to be considered in any LDP revision.	RR to be amended to make a recommendation on whether or not the LDP spatial strategy needs revising and to consider the implications for the form of any LDP revision

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
47.3	Taylor Wimpey (Turley)	Agree	<p>Support the Council’s approach of focusing the majority of residential development in the County’s main towns. However windfall sites have accounted for a significant proportion of completions within the main towns. Although this is still in line with the spatial strategy it is clearly a concern that the necessary housing delivery is not coming from the strategically identified sites. There is now a risk that the level of housing planned for will not be achieved within the plan period. The LDP Review is an opportunity to rectify this failure of the plan and additional sites should be identified and allocated to ensure that housing needs are met. Suitable sites in sustainable locations capable of delivering dwellings within the plan period should be allocated to accommodate the strategic growth needs of the County. The Report cites the previous poor record of housing delivery and seeks to use this to justify that achieving 750 dwellings per annum is ‘unrealistic’. Object to this approach, as the adopted housing requirement went through examination and was adopted on the basis that it reflected the required level of housing provision necessary to be delivered in the County to support the various other growth aspirations in the plan. A past record of under delivery and poor performance is not justification to plan for further failures in delivering the</p>	<p>It is noted that the respondent appears to consider that the LDP spatial strategy is functioning effectively. The RR recognises that there is a need to increase the supply of housing land. It is also considered reasonable to indicate that there is a need to consider whether the targets are appropriate in the light of, for example, the more recent Welsh Government population and household projections, the methodology for calculating a 5-year housing supply and past building rates. These are factors that suggest that the LDP needs revising, along with the fact that the current LDP is not meeting its targets or achieving a 5-year housing supply, which may necessitate additional site allocations. The future level of housing growth will be a matter for any LDP revision.</p>	<p>RR to be amended to make a recommendation on whether or not the LDP spatial strategy needs revising and to consider the implications for the form of any LDP revision.</p>

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
--------	-------------	---	---------	--------------	----------------

plan strategy. In addition the report seeks to explain the poor delivery in housing by claiming that issues in the wider economy and housing market have suppressed delivery and that this has not recovered since the recession. However the wider economy is showing recovery and in the adjoining authority (Newport) 952 dwellings were completed in 2017, which clearly demonstrates that there is not a regional weakness in the economy or the housing market. Support the need for additional site allocations to be made through the LDP Revision.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
48.3	Llanarth Estates (WPM Planning)	Disagree	<p>Whilst the spatial strategy in relation to housing is generally supported, the current policies in place to facilitate this strategy in main and minor villages are considered to be fundamentally flawed which has led to a failure to deliver the spatial strategy proposed to the detriment of rural locations and their current inhabitants, future generations and ageing population. The spatial distribution of employment too heavily relies upon strategic sites/location, this leaves little choice for businesses and employers in terms of location. The existing tourism strategy is considered restrictive and debilitating growth in this industry in the County. The policy only supports temporary accommodation which does not allow for long term investment or tourist provision. The LDP Vision remains relevant and the principles set are encouraged and welcomed. The objectives are generally supported however those that refer to the level and range of homes, rural communities, infrastructure and the economy are considered to need updating in light of the progress of the LDP since its adoption:</p>	<p>It is noted that the respondent considers that the LDP spatial strategy is not functioning effectively. The RR recognises that the spatial strategy may need revising.</p>	<p>RR to be amended to make a recommendation on whether or not the LDP spatial strategy needs revising and to consider the implications for the form of any LDP revision</p>

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
50.3	Mrs Evelyn Birden (Newland Rennie)	Disagree	The Spatial Strategy should include minor villages where accessible to permit residential development up to 15 dwellings with the emphasis on affordable housing.	It is noted that the respondent considers that the LDP spatial strategy is not functioning effectively. The RR recognises that the spatial strategy may need revision. The RR also acknowledges (para 3.3 .8) that there is a need to consider revisions to the rural housing policies and/or how they are implemented, although within a general context that the primary aim of the rural housing allocations is to make provision of affordable housing for local people living in the rural parts of the County.	RR to be amended to make a recommendation on whether or not the LDP spatial strategy needs revising and to consider the implications for the form of any LDP revision
51	Dr David Rosser (Newland Rennie)	Disagree	The development focus is totally concentrated on Severnside whereas other areas in the centre of the County such as Usk and other centres have not been considered where infrastructure is suitable for additional development.	It is noted that the respondent considers that the LDP spatial strategy is not functioning effectively. The RR recognises that the spatial strategy may need revising	RR to be amended to make a recommendation on whether or not the LDP spatial strategy needs revising and to consider the implications for the form of any LDP revision



Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
52.3	Morris' of Usk (WPM Planning)	Disagree	Whilst the spatial strategy in relation to housing is generally supported, i.e. growth being promoted in main towns, then Severnside, rural secondary settlements, main villages and to a lesser extent minor villages. The current policies in place to facilitate this strategy in main and minor villages are considered to be fundamentally flawed which has lead to a failure to deliver the spatial strategy proposed to the detriment of rural locations and their current inhabitants, future generations and ageing population. TAN 2 states that all local communities, both urban and rural, should have sufficient good quality housing for their needs, including affordable housing. As such, an appropriate amount of residential development of all tenures should be considered in rural areas to fulfil housing need.	It is noted that the respondent considers that the LDP spatial strategy is not functioning effectively. The RR recognises that the spatial strategy may need revising.	RR to be amended to make a recommendation on whether or not the LDP spatial strategy needs revising and to consider the implications for the form of any LDP revision
53.3	Barton Willmore	Disagree	As noted within the response to Q1 the impact of the removal of the Severn Bridge tolls, alongside wider economic aspirations (such as the Cardiff Capital Region City Deal and Welsh Government Metro proposals) will need to be given due consideration and an updated LDP Spatial Strategy devised to reflect this.	It is noted that the respondent considers that the LDP spatial strategy is not functioning effectively. The matters raised are matters to be considered in any LDP revision.	The RR recognises that the spatial strategy may need revising. These are matters to be considered in any LDP revision. RR to be amended to make a recommendation on whether or not the LDP spatial strategy needs revising and to consider the implications for the form of any LDP revision.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
55.2	Abergavenny Transition Town (Late Rep)	Neither Agree Nor Disagree	The draft Review provides limited evidence to assess this. The overall reliance on strategic sites has been discussed but further analysis on a town-by-town basis is needed, evaluating any imbalance.	The benefits of a town-by-town analysis can be appreciated and will be looked at in more detail as part of any LDP revision process. It is not considered that such a level of detail is required at this stage, the aim of which is to assess, in broad terms, whether or not the existing LDP is working effectively.	No change to the RR.
56.3	Monmouth Town Council (Late Rep)	Disagree	Given the impact of the new NDF and the Regional plans around the Cardiff Capital Regional City Deal. This section needs an update. Given the growth in internet shopping and ICT on new homes there should be consideration given to a section in the LDP on high-speed broadband. The section on retail development and building developments we consider that on town statements needs to be reviewed and planning impact studies undertaken that support the viability of the retail sector in our market towns. A policy and process need to be put in place that recognises the old section 106 process. This should seek to support the place plans for town councils. Given the impact of the Well Being of Future Generations Act a full assessment of the implications of future generations should be undertaken. Sites are not being brought forward as quickly as expected therefore should a new settlement be considered.	Comments noted. These are matters to be considered in any LDP revision.	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
60.2	St Arvans Community Council (Late Rep)	Neither Agree Nor Disagree	No reports/updates have been received from MCC.	Comment noted.	No change to the RR.

## Q4 (Section 3.3): Do you agree with the findings of the LDP policy review?

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
1.4	Chepstow Society	Disagree	"Affordable Housing" is misunderstood by the public at large. More effort needed to explain its application.	Comment noted. This is a matter that can be considered in the consultation process for any LDP revision.	No change to the RR.
1.5	Chepstow Society	Disagree	Waste disposal needs to revert to a system for recycling of source separation to fit with current Welsh Government thinking.	This is not a matter for the LDP.	No change to the RR.
1.6	Chepstow Society	Disagree	Emphasis on Cardiff as a Capital Regional Plan will not do much to help Monmouthshire. Cardiff has enough "pull" already.	Comment noted.	No change to the RR.
2.1	Pontypool Park Estate	Comment	3.3.6: Whatever the merits of each case it discredits the extensive and lengthy LDP process if departure applications are approved so easily and cheaply.	Comment noted. It is agreed that it is preferable for planning applications to be determined in accordance with an approved development plan, hence the need for a revision to the LDP. However, Planning Policy Wales provides clear guidance on how planning applications should be considered where an authority does not have a 5 year land supply.	No change to the RR.
2.2	Pontypool Park Estate	Comment	3.3.11: Do not confuse need and demand.	Comment noted.	No change to the RR.
3.4	Trustees of the Late Mrs H M Langham	Agree	Agreement noted.		No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
4.4	Heine Planning	Disagree	With regard to para 3.3.11 onwards concerning Policy H8 and G&T it is clear the 2009 needs assessment for G&T underestimated need and was flawed. It failed to address both the need at Llangeview and at Llancayo, Usk. Current Policy was not informed by the 2016 need assessment. There is a need to make provision for more sites as noted in para 3.3.14, with site allocations made via the revised Local Plan. It is not accepted that Policy H8 is functioning effectively, it is not delivering sites without the need to go to appeal.	Comments noted. However, it should be noted that in 2009 the appellants for the Llangeview site were living at the Shirenewton site in Cardiff, and the occupiers of the Llancayo site were either living in bricks and mortar accommodation in Monmouthshire or living in Torfaen. The RR recognises that any LDP revision will need to give further consideration to addressing any unmet need for the provision of gypsy and traveller sites.	No change to the RR

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
6.1	The Canal & River Trust	Comment	<p>Policy MV6- note that the council comment that the policy is functioning effectively but has limited applicability, and so it is necessary to consider whether the policy is still required. Comment that the existing policy has little benefit due to its limited scope and advocate the need for an alternative strong canal related policy which recognises the multi- functionality of the canal and its wide ranging benefits. Existing policy is very limited in considering sustainable transport alone, the Monmouthshire &amp; Brecon Canal features strongly in the Council's Destination Management Plan and can contribute to the well-being plan in a number of ways. Welcome the opportunity to work with the council on the creation of a new canal related policy and supportive text as part of the next stage of work on the LDP review.</p>	<p>Comment noted. The RR acknowledges that there is a need to reconsider the need for Policy MV6, although the respondent appears to be suggesting that a policy is required, albeit in a modified form. This matter can be addressed in any LDP revision.</p>	<p>Amend the commentary on MV6 in the RR to read '... considered whether still required or whether amendment would be beneficial'.</p>
7.4	Mr Alan Horne	Agree	<p>Failing to provide sufficient affordable Homes. With the prices of homes rising partially due to the removal of the toll on the Severn bridges, this places a greater hurdle for people on low incomes to afford their own homes.</p>	<p>Agreement noted. The RR recognises that there is a need to attempt to increase the supply of affordable housing. This will be a matter to be considered in any LDP revision.</p>	<p>No change to the RR.</p>

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
8.3	Ann Langford	Disagree	Considers that that LDP should not be reviewed at this stage. There is no need to review the current strategic sites or add additional sites, there is more than enough land until 2021. Given the difficulties of forecasting demand with accuracy, rather than try to forecast up to 2036 resources should be devoted to reducing the delays in obtaining planning permission under the current LDP framework.	Comments noted. While the views expressed can be appreciated, the failure to meet housing targets set out in the LDP and the lack of a 5-year supply in accordance with the Welsh Government's current methodology does suggest a need to revise the LDP to ensure that planning applications can be considered within the framework of an up to date development plan.	RR to be amended to make a recommendation on whether or not a LDP revision should take place and, if so , whether it should be a short form revision or a full revision.
9.4	SA Brain & Co Ltd	Neither Agree nor Disagree	Amendment required to Policies S1 and S2. Need to re-assess undelivered allocations and allocate additional deliverable and viable sites to meet the LDP Review housing requirement. It will be essential that there is adequate flexibility in provision to allow for non-implementation of allocated sites. Evident that the adopted LDP does not have sufficient flexibility which has exacerbated the shortage in the 5 year supply. Need for more allocations in the lower tier settlements, there is limited delivery within the lower tier settlements and this is a significant factor that needs to be addressed during the LDP Review.	The RR acknowledges that there is a need to consider new housing allocations and to re-assess undelivered housing allocations as part of any revision process.	No change to RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
9.4			Affordable Housing (Policies S4, H7, SAH11) - Paragraph 3.3 .6 demonstrates that there has been considerable variation in the percentage of affordable housing between different sites and that the Council are prepared to take a flexible approach depending on the viability of sites. Whilst this may lead to delay in determining applications, it is essential that there is flexibility to allow sites to come forward. Important that affordable housing policies in the LDP Review include percentage affordable housing requirements based on viability evidence and that policies are flexible to allow variation in provision depending on site viability. With only 2 out of 19 sites being delivered this demonstrates that there has been a significant failure in delivering exception sites and that a requirement of housing at these sites needs to be addressed and reviewed.	The DDR (para. 3.3 .7) acknowledges that further viability testing will need to be carried out as part of any revision process to ensure that affordable housing policy requirements are based on up to date information on development costs and values. The RR also acknowledges (para 3.3 .8) that there is a need to consider revisions to the rural housing policies and/or how they are implemented, although within a general context that the primary aim of the Main Village allocations is to make provision of affordable housing for local people living in the rural parts of the County.	No change to the RR.
10.2	Natural Resources Wales	Comment	Undelivered allocated sites should be re-assessed using up to date environmental data constraints e.g. revised flood map information.	Comment noted. Undelivered allocated sites will be re-assessed in any LDP revision process.	No change to the RR.
11.4	Mr Paul Cawley	Neither Agree nor Disagree		Noted.	No change to the RR.



Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
12.4	RPS Planning	Neither Agree nor Disagree	Agreed that LDP Policies S1 and S2 will need to be amended to accommodate an increase in housing land supply and the Plan's residential site allocations will need to be reviewed and reassessed as part of the LDP revision process (paras 3.3 .4 and 3.3 .5 refer). Suggests land at Ross Road, Abergavenny as being a suitable site for increasing housing supply.	Comment noted. The RR acknowledges a need to increase housing supply and re-assess existing site allocations. The suitability, or otherwise, of any potential candidate site will be a matter to be considered in any LDP revision.	No change to the RR.
13.4	Ward Estates Ltd	Agree	Agreed consideration will need to be given to the appropriate level of growth over the extended plan period and the suitability of the adopted spatial strategy which will require an amendment to policies S1 and S2. Also agreed that the housing site allocations will require amendment with the re-assessment of undelivered allocations and to allocate additional F71 deliverable and viable sites. In assessing the amount of land to be allocated for housing it will be essential to ensure that there is adequate flexibility in provision to allow for non-implementation of allocated sites.	Comment noted. The RR acknowledges a need to increase housing supply and re-assess existing site allocations.	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
13.4			<p>Para 3.3 .6 demonstrates that there has been considerable variation in the percentage provision of affordable housing between different sites which demonstrates that the Council are prepared to take a flexible approach depending on the viability of sites . Whilst this may lead to delay in determining applications it is essential that there is flexibility to allow sites to come forward. It will be important that affordable housing policies in the LDP Review will include percentage affordable housing requirements based on viability evidence and that the policies are flexible to allow variations in provision depending on site viability.</p>	<p>Comment noted. The DDR (para. 3.3 .7) acknowledges that further viability testing will need to be carried out as part of any LDP revision to ensure that affordable housing policy requirements are based on up to date information on development costs and values.</p>	<p>No change to the RR.</p>

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
15.4	Bovis Homes (RPS)	Neither Agree nor Disagree	Agreed that LDP Policies S1 and S2 will need to be amended to accommodate an increase in housing land supply and that the Plan's residential site allocations will need to be reviewed and re-assessed as part of the LDP revision process. Support is provided to the recognition of the continued delivery of the Wonastow Road Strategic Housing Site at Monmouth, the site continues to be deliverable and should be retained and expanded as a Strategic housing site within the LDP Review. The balance of the Wonastow Road Strategic Site will come forward at land known as Drewen Farm. In addition land immediately adjacent to the allocated site, land to the north and west, offers an opportunity for an additional new site allocation that is accessible, free from constraints and deliverable.	Comment noted. The RR acknowledges a need to increase housing supply and re-assess existing site allocations. The suitability, or otherwise, of any potential candidate site will be a matter to be considered in any LDP revision, although it is recognised that the existing site allocation at Drewen Farm, Monmouth referred to by the representor has good prospects of coming forward and is part of a larger allocation that is already being developed.	No change to the RR.
16.4	Bovis Homes (Walsingham Planning)	Agree	Agree that the housing policies require review in any full revision of the Plan, which is expected to extend its operational period to 2036. Agree that it will also be necessary to allocate additional deliverable and viable sites to meet the County's housing requirement over an extended Plan period.	Comment noted. The RR acknowledges a need to identify additional housing sites. Any potential changes to Green Wedge and Policy M2 designations will be matters for any LDP revision.	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
16.4			<p>A review of the Plan’s residential site allocation policies and the identification of new sites for housing will mean that the appropriateness of policies that currently restrain new development, particularly at the edge of the County’s major settlements, will need to be reassessed. Welcome the identification of Policy LC6: Green Wedges as a policy that requires review. Specifically support the intention to fully review and revise the Green Wedge boundaries to ensure that designations are justified in the context of future growth requirements and strategies.</p>		
16.4			<p>The existing Green Wedge designation to the west of Chepstow constitutes a considerable constraint to the future growth of the town. There is no scope to accommodate new strategic development in other directions, given topographical constraints , the AONB landscape designation to the north, and the presence of various cultural heritage designations. Consequently, the logical direction for growth is to the west of the town and can be achieved without leading to coalescence with other settlements .</p>		
16.4			<p>The policy review should also include Policy M2, to establish whether the boundaries of the minerals safeguarding areas remain fit for purpose.</p>		

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
20.4	Hallam Land Management (Asbri)	Agree	<p>The findings are generally supported as they confirm the need to allocate additional deliverable and viable sites to meet the County's requirement over an extended plan period. The key policies, including those relating to Housing and Site Allocations, and Affordable Housing are particularly in need of review. As the current LDP has not delivered sufficient housing, there are associated implications relating to the delivery of affordable housing. Policy S1 is referred to as a policy which needs to be amended in conjunction with wider policy aspirations associated with the Cardiff Capital Region. However it must be questioned whether Policy S1 requires any significant degree of amendment as the focus on the main market towns in Monmouthshire is likely to remain in the absence of any alternatives.</p>	<p>Agreement noted. The RR recognises that there is a need to increase the supply of housing land.</p>	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
21.4	Hallam Land Management (Boyer)	Agree	Housing and Site Allocations (Policies S1, S2, S3, SAH1-SAH11) - the adopted LDP has not delivered the level of housing growth identified as a consequence consideration will need to be given to the appropriate level of growth over the extended plan period and the suitability of the adopted Spatial Strategy which will require an amendment to policies S1 and S2. Agreed that the housing site allocations will require amendment with the re-assessment of undelivered allocations and to allocate additional deliverable and viable sites to meet the LDP Review housing requirement. In assessing the amount of land to be allocated for housing in the LDP Review, it will be essential to ensure that there is adequate flexibility in provision to allow for non-implementation of allocated sites. It is evident that the adopted LDP does not have sufficient flexibility which has exacerbated the shortage in the 5 year supply.	Comment noted. The RR acknowledges a need to increase housing supply and re-assess existing site allocations.	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
21.4			<p>Affordable Housing (Policies S4, H7, SAH11) - Paragraph 3.3 .6 demonstrates that there has been considerable variation in the percentage provision of affordable housing between different sites which shows that the Council are prepared to take a flexible approach depending on the viability of sites. Whilst this may lead to delay in determining applications, it is essential that there is flexibility to allow sites to come forward. It will be important that affordable housing policies in the LDP Review will include percentage affordable housing requirements based on viability evidence and that the policies are flexible to allow variations in provision depending on site viability.</p>	<p>Comment noted. The DDR (para. 3.3.7) acknowledges that further viability testing will need to be carried out as part of any revision process to ensure that affordable housing policy requirements are based on up to date information on development costs and values.</p>	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
22.4	Redrow Homes	Agree	<p>The main issue is that some primary allocations that make up a valuable contribution to housing numbers were not deliverable. Concerns with specific site deliverability were expressed during the LDP preparation / examination by the development industry, it is important that the deliverability of sites put forward are recognised. This should include land ownerships and site disposals strategies being produced and followed. The reference to site delays due to viability is primarily down to unrealistic policies being set during the LDP preparation/examination and were raised by the development industry. Reference to past build rates for housing land supply is inappropriate. National Planning Policy guidance is explicit on methodology. The JHLAS 5 year land supply is purely a measuring tool and has no influence on the actual issues relating to housing demand and supply. The need for housing / housing land and the ability to deliver it should be the focus.</p> <p>Adjusting a land supply calculation may show betterment to the 5 year supply but only on reduced forecast and reduced delivery which is surely not the point.</p>	<p>Comments noted. The RR recognises that there is a need for additional housing allocations. The future level of housing growth will be a matter for any LDP revision. There is a need to consider whether the targets are appropriate in the light of, for example, the more recent Welsh Government population and household projections, the methodology for calculating a 5-year housing supply and past building rates.</p>	No change to the RR.



Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
23.4	Richborough Estates (Turley)	Disagree	Support the need to allocate additional deliverable and viable sites to meet the housing requirement over the extended plan period. Whilst there is a role for strategic allocations, it is important that the LDP allows sufficient flexibility for other sustainable and deliverable sites to come forward. The value of allowing for a range of sites to come forward is demonstrated by the Council's pragmatic approach to the current housing supply position.	Comment noted. The RR recognises the need for additional housing allocations.	No change to the RR.
24.4	Mrs Carolyn Ovenden	Neither Agree Nor Disagree	It is impossible to answer this question as one must assume that the figures quoted in the review are correct. The original LDP was obviously flawed if a review is necessary	Noted.	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
25.1	Angela Smith		Strongly object to any amendments which would increase the number of general market and affordable housing on the Crick Road development site. On the basis of 34 houses per hectare the maximum number of houses would be 252.3 for the Crick Road site, considerably less than the 285 currently proposed. There are no changes to the existing infrastructure to support any new build. A failure to ensure that planning permission is only given to developers that can fulfil the number of required general market and affordable homes should not lead to the detriment of those sites that are already more than fulfilling their allocation.	This is not a matter for the LDP review or any future LDP revision but a detailed matter that would be appropriately considered under any future planning application for the development of this allocated LDP site.	No change to the RR.
26.		Comment	MV1 in relation to proposed developments and highways needs to be strengthened to fully take account of the need for infrastructure requirements and not to allow for unsustainable development.	The RR expresses the view that policy MV1 is functioning effectively. Nevertheless, any LDP revision would provide an opportunity to consider re-wording if felt to be appropriate.	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
26.4	Cllr Louise Brown	Disagree	There is no necessity for the LDP to be reviewed if the population projections are revised to a lower figure and then the LDP would have the 5 year rather than 4 year supply.	Comment noted but any revision to the housing target as a result of revised population projections could only be done through a revision to the LDP.	No change to the RR.

26.4

Disagree

Strongly disagree with the proposal to delete SD3 flood risk policy, this policy needs to be both retained and strengthened by national policy. MCC is not giving this national policy enough weight, this is unfair to future residents who may not be able to get household insurance or have to pay exorbitant rates for insurance. The review suggests removing the flood policies. These should not be removed because of the fact that there are National policies instead this policy needs to be reinforced with reference to making sure that national policy is followed. Residential development should not be in Flood zone C2. There are extremely good reasons for following national planning policy so that residents do not have to suffer from the devastating impact of flooding.

The suggested removal of Policy SD3 is in accordance with generally accepted practice that LDP policy should not repeat national planning policy and should be in consistent with it. Sufficient control over development in flood risk areas is provided by Technical Advice Note 15. The current LDP policy is not consistent with national policy - in some aspects it is more lenient and in others it is stricter. This inconsistency is not a satisfactory situation. Any changes to the policy, however, that would be a matter for any LDP revision.

No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
26.4		Disagree	In addition in England the National planning policy framework and case law have prevented back garden development. This is presumably because of the impact of concreting over gardens so that there is no natural drainage of water. The same effects have been noted in the Bulwark area of Chepstow due to residents putting tarmac over gardens for parking spaces.	This matter has been addressed via other mechanisms, for example the Welsh Government has amended permitted development rights to require permeable surfaces or drainage retention. Monmouthshire's LDP cannot change the brownfield status of domestic gardens.	No change to the RR.
26.4		Disagree	Policy LC6 on Green Wedges should not be changed except to change to greenbelt to provide better protection to the existing green wedges. It is vitally important that this policy is maintained. The protection of the green gap wedge between towns and villages and between villages and villages is vital to maintain village identity and to stop urban sprawl and prevent villages merging. To do otherwise will destroy the identity of the villages and should never be allowed. The main villages close to Chepstow are under threat due to an unnecessary threat of unsustainable development in the South Monmouthshire area.	The RR suggests that there is a need to review Green Wedge boundaries. It is considered necessary to carry this out to ensure that such designations can be appropriately justified. The respondent's opposition to any amendments is noted but this is a matter that will be considered in any LDP revision.	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
28.4	Llangybi Community Council	Disagree	In general terms the issues have been fully identified. However, concerned about the implication in Paras 3.3 .9 and 3.3 .1 0 that the affordable housing requirements will need to be relaxed. Also concerned that it is proposed to reassess the recreation and open plan spaces as per paras 3.3 .1 8 and 3.3.19. Any loss of such space is not compatible with additional housing.	Comments noted. The paragraphs referred to state that these policy areas will be re-considered. This does not necessarily imply a relaxing of requirements or lowering of standards and, in any event, these would be matters for any LDP revision.	No change to the RR.
30.2	Monmouth Chamber of Commerce	Agree	Agree with the revision of Primary shopping Frontages to ensure designations are up to date and appropriate. Need to consider how much change from A1 retail to A3 and A5 use is acceptable. Seek a more pragmatic approach on changes to commercial buildings in Primary Shopping Frontages areas to make them fit for contemporary retail use. The retail sector is in a constant state of change due to competition from internet shopping and out of town retail developments, studies need to be done on a yearly basis and appropriate action taken to rectify any undesirable trends.	Comments noted. These are matters to be considered in any LDP revision.	No change to the RR.
30.2		Comment	Support efforts by the council to improve the tourism offering and the use of renewable energy. See 3.3 .36 to 3.3 .42	Comments noted. These are matters to be considered in any LDP revision.	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
30.2			Not enough thought went in to decisions on siting new housing estates when the new Wonastow Road and Owen Glyndwr locations were chosen from the list of Candidate Sites. It is currently difficult, or even dangerous, to walk into town from these sites. Recommend that any new housing locations are sited where residents can travel on dedicated traffic free foot and cycle paths into the town thus reducing the demand for more car parking and contribute to their well-being. Question the reasoning behind creating satellite housing developments where a consequence is that residents who out migrate to work will be tempted to shop near work and not locally.	Comments noted. These are matters to be considered in any LDP revision.	No change to the RR.
30.2			Question the comment made in 3.3 .51 as to the effectiveness of transport in our area of Monmouthshire. Public transport remains very poor, especially to locations outside the county.	This paragraph specifically relates to LDP policies on transport. It is recognised that there are difficulties with public transport in Monmouthshire. The LDP can have limited influence over public transport facilities.	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
31.4	Mr Adrian Lewis	Neither Agree Nor Disagree	The findings are sound but lack detail on what they mean in practice, particularly when it comes to numbers of dwellings and distribution of strategic sites. If it means increasing the number of dwellings on the Crick Road site, then I am against the findings. Likewise if it means increasing the percentage of affordable homes on strategic sites, then I am against this too. The numbers of affordable homes do not appear to take into account that the Paper Mills site was not initially included in the LDP - 9.4% of its number, I understand, amounts to 18 homes. This is 18 more than originally planned for. Also I would question what is considered viable. If MCC has a policy of 25% affordable homes on a site then the developers should adhere to this and understand the impact on profitability. Any shortfall should not be imposed on strategic sites.	The reference to the Crick Road site is not a matter for the LDP review or any future LDP revision but a detailed matter that would be appropriately considered under any future planning application for the development of this allocated LDP site. Any possible changes to affordable housing percentages would be a matter for any LDP revision. Policy required that the Sudbrook Paper Mill site should have provided 25% affordable but this had to be reduced because of viability considerations resulting from the expense of remediating a brownfield site.	No change to the RR.
32.4	Mr Rees Williams	Agree	It reflects the current situation and once again urgent correction to housing /land supply is required.	Agreement noted.	No change to the RR.
33.4	Abergavenny Town Council	Comment	There are clearly some areas which are more than local, therefore will the evidence base consider the regional dimension. Infrastructure is an obvious example.	Any revised LDP will involve consultation with neighbouring authorities and will be prepared in the context of the Cardiff Capital Region, City Deal etc.	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
34.3	Barratt David Wilson Homes		In light of the forthcoming abolishment of the Severn Bridge tolls, consider there to be a major opportunity for housing growth within the Severnside area. The viability of these areas is likely to see a significant improvement in the near future, thereby improving the deliverability of these sites. Accordingly, suggest that a greater proportion of new housing development should be directed to these areas.	Comment noted. It appears that the respondent is suggesting that the LDP's spatial strategy requires revising to increase the focus on the Severnside area. Any policy review needs to ensure affordable housing meets identified need and future flexibility both in terms of size and tenure.	RR to be amended to make a recommendation on whether or not the LDP spatial strategy needs revising and to consider the implications for the form of any LDP revision
34.3			Welcome the review of land designated by Policy DES2 given that a number of these designations are no longer fit for purpose. In terms of Green Infrastructure, would suggest that the Green Infrastructure Supplementary Planning Guidance is reviewed given that it is difficult to use and does not provide sufficient clarification as to the way green infrastructure planning obligations will be calculated or defined. Furthermore, given the financial implications of providing Green Infrastructure within the County, the associated costs need to be factored into viability reviews undertaken for proposed allocations in the LDP Review and the Affordable Housing Viability Review.	Comment noted. The Green Infrastructure policy and SPG have been useful in ensuring better quality place-making and environments for future occupiers. Consideration will be given to whether the Policy or SPG requires clarification. It is accepted that achieving GI often requires lower development density and the revised LDP will need to respond to this.	No change to the RR.



Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
36.4	East Mon Industrial Holdings Ltd (WYG)	Disagree	<p>Agree that policies S1 and S2 and site allocations will need to be fully reassessed as part of the full review of the LDP. In addition it is considered that necessary amendments to green wedge designations will be required. It is considered essential that the plan's employment policies, specifically Policy S9 Policy SAE1 are reassessed in full. This should include the consideration of additional land for allocation in the right locations and the desirability of allowing greater flexibility of economic uses on such allocated sites. The need to undertake a full review of the plan's employment policies is further reinforced by the fact that the LDP employment evidence base will need to be updated to take into account the requirements of Chapter 7 of PPW which has been updated since the adoption of the LDP and updated TAN 23: Economic Development (February 2014) . The LDP take-up rate will need to be reassessed to factor in the new economic opportunities arising from the City Deal and Severn Bridge tolls abolition. Reassessment of both the total amount and the spatial distribution of employment land is required as part of the full review of the LDP. In regard to the plan's review of tourism policy, it would appear that tourism policies are enabling a significant level of 'sustainable tourism' to come forward in the County. It is considered</p>	Comments noted. These are matters to be considered in any LDP revision.	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
			that alongside the promotion of sustainable tourism, the LDP review should consider the need for provision of larger-scale accommodation, to ensure that the policy framework does not over-provide on alternative forms of sustainable accommodation to the detriment of hotel accommodation.		
37.4	Abergavenny & District Civic Society		The findings are not always clear, particularly regarding housing and employment performance. Would not agree that all the design and heritage policies have been functioning entirely effectively. The draft report refers to minor amendments needed as a result of Officer Working Group comments. In view of concerns with regard to the Morrison store would like to see them. The report maintains that Policies MV2 (Sustainable Transport Access) and SD12 (Sustainable Construction and Energy Efficiency) are functioning effectively. The latter needs discussion as it may no longer be a planning function. Performance under MV2 has probably improved but a detailed analysis could explore the scope for greater effectiveness.	Comments noted. They appear to relate to how existing policies are implemented but policy wording can be considered further in any LDP revision.	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
39.4	Home Builders Federation	Neither Agree Nor Disagree	Para 3.3 .8 suggests that work has already been done to establish why allocated sites have not come forward. Whereas para 3.2 .14 suggests further consideration will be given to the reason for the lack of progress. This should be clarified/consistent. Suggest as part of the survey of open space within the main settlements and villages, details of any open space lost compared to the 2008 study should be identified and the reason for its loss noted. Reference should also be made to the Councils position with regard to the adoption of open space.	The information in para. 3.3 .8 is based on current knowledge, rather than any detailed analysis or investigation. As part of any LDP revision process a further detailed analysis would need to be carried out to justify under the candidate site assessment process to justify retention or deallocation of village sites. There is not considered to be any inconsistency with para. 3.2.14. Para. 3.3 .1 8 Comment noted. This can be considered as part of the open space survey. Para. 3.3 .19 This not considered necessary. A guidance note is being prepared to assist in Section 106 negotiations, including information on open space adoption.	No change to the RR.
40.	Magor with Undy Community Council	Neither Agree Nor Disagree		Noted.	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
41.4	Philippa Cole	Disagree	The LDP Review Report appears to be laying the foundation for there to be reduced level of housing delivery during the plan period and a review of the housing targets. There has been no consideration of the possible pent up demand for housing indicated by the higher population base data recorded in the 2011 figures which could suggest that many potential households are not forming due to supply issues. It remains Welsh Government priority to increase housing supply and maximise benefits through local jobs and apprenticeships.	It considered reasonable to indicate that there is a need to consider whether the targets are appropriate in the light of, for example, the more recent Welsh Government population and household projections, the methodology for calculating a 5-year housing supply and past building rates. These are factors that suggest that the LDP needs revising, along with the fact that the current LDP is not meeting its targets or achieving a 5-year housing supply, which may necessitate additional site allocations. The future level of housing growth will be a matter for any LDP revision.	Paragraph 2.3.5 of the RR to be amended to clarify the reasons behind household formation.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
45.4	Bovis Homes Group (Lichfields)	Agree	Consider that the shortfall in the housing land supply is not as simple as is suggested in the Review Report. It is important that the Council undertakes a comprehensive review into why allocated housing sites are not coming forward, with specific reference to the LDP allocation Land at Vinegar Hill . This should include a full review of the policies within the plan to ensure that the targets set out do not make sites unviable i.e. s106 contribution. It is important that each housing allocation is reviewed on its own merit taking into account the very specific issues relating to that site. Any review of undelivered housing allocations should be in consultation with the landowner / site promoter, and a transparent approach should be undertaken when assessing whether the sites remain viable and deliverable. Furthermore it is important that this review is undertaken with consideration to ensuring that sufficient housing land is identified to meet the level of housing growth, taking into account the significant shortfall in housing supply since the adoption of this LDP, and while also making provision for a flexibility allowance, to allow for a greater choice of housing land to be delivered.	The RR acknowledges that there is a need to re-assess undelivered housing allocations and the respondent's site specific comments are noted. This will be a matter for any LDP revision.	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
46.4	Llanover & Coldbrook Estate (LRM Planning)	Disagree		Noted.	No change to the RR.
47.4	Taylor Wimpey (Turley)		The LDP Review process is an appropriate opportunity to review Green Wedge Policies. There is a clear distinction between the policy intentions for Green Wedges when compared to Green Belt, with the former specifically including flexibility to be reviewed unlike Green Belt which is intended to have an element of permanence. Policy LC6 needs to be reviewed as part of the LDP Review. A revision in the boundaries of current Green Wedges is necessary to ensure such restrictive designations are justified in the context of a Local Authority with a very poor track record of housing delivery. There is a clear shortage of housing delivery in the County and the LDP review is a critical opportunity to review this designation, reflecting material change in circumstances since this designation was put in place.	Comments noted. The matters raised are matters to be considered in any LDP revision.	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
48.4	Llanarth Estates (WPM Planning)	Disagree	<p>Whilst the general findings of the review are concurred with the following aspects of the review are not supported. The calculation for the housing land supply is the residual method and the past build rates method is considered irrelevant. It is considered that the housing projections proposed to form the basis for the revised LDP are not sufficient in taking account of likely population growth following the abolition of the Severn Bridge tolls. The difficulties of delivering the rural allocation sites is far more complicated than purely unrealistic land owner expectations but a combination of infrastructure costs, visual impact, contractors availability and deliverability, size of allocations and land owner expectations. It is not reasonable to blame landowners for the lack of rural allocations coming forward when it is clear the rural allocations policy is failing due to the lack of robust economic consideration in the allocation of the sites and the associated often unrealistic affordable housing targets. Allocation of alternative sites with the same policy context is likely to produce the same results. The policy relating to minor villages and infill development is unclear in terms of the level of affordable housing required for developments of 1 or 2 dwellings. Further clarity is required in regards to Policy H7 and how rural exception sites will be considered in</p>	<p>Comments noted. It considered reasonable to indicate that there is a need to consider whether the targets are appropriate in the light of, for example, the more recent Welsh Government population and household projections, the methodology for calculating a 5-year housing supply and past building rates. These are factors that suggest that the LDP needs revising, along with the fact that the current LDP is not meeting its targets or achieving a 5-year housing supply, which may necessitate additional site allocations. The future level of housing growth will be a matter for any LDP revision. The RR acknowledges (para 3.3 .8) that there is a need to consider revisions to the rural housing policies and/or how they are implemented, although within a general context that the primary aim of the Main Village allocations is to make provision of affordable housing for local people living in the rural parts of the County.</p>	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
48.4			respect of minor villages which do not have a settlement boundary.		
48.4			<p>A Key issue for the LDP to resolve is providing for the ageing population. It is considered that a policy specifically for elderly person's accommodation should be proposed to facilitate such developments in urban and rural locations. The quantity and location of the majority of the employment allocations is considered restrictive to smaller, rural business. Employment opportunities in minor villages should be considered to enable localised employment opportunities. The tourism policy as currently applied is considered restrictive and does not allow for purpose built visitor accommodation in more modern buildings. It is considered that if Monmouthshire is to meet the LDP Vision, there is a need to increase the quality and range of tourism proposals especially in key locations near attractions.</p>	Comments noted. These are matters to be considered in any LDP revision.	No change to the RR.
50.4	Mrs Evelyn Birden (Newland Rennie)	Agree	In general agree providing the release of suitable additional land allocations are released to maintain housing requirements.	Comment noted.	No change to the RR.



Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
51.4	Dr David Rosser (Newland Rennie)	Agree		Agreement noted.	No change to the RR.
52.4	Morris' of Usk (WPM Planning)	Disagree	<p>Whilst the general findings of the review are concurred with the following aspects of the review are not supported. It is considered that the housing projections proposed to form the basis for the revised LDP are not sufficient in taking account of likely population growth following the abolition of the Severn Bridge tolls. The difficulties of delivering the rural allocation sites is far more complicated than purely unrealistic land owner expectations but a combination of infrastructure costs, visual impact, contractors availability and deliverability, size of allocations and land owner expectations. It is not reasonable to blame landowners for the lack of rural allocations coming forward when it is clear the rural allocations policy is failing due to the lack of robust economic consideration in the allocation of the sites and the associated often unrealistic affordable housing targets. Allocation of alternative sites with the same policy context is likely to produce the same results. It is strongly considered that the delivery of affordable housing, especially in rural areas is flawed, and needs full revision in any LDP review.</p>	<p>Comments noted. It considered reasonable to indicate that there is a need to consider whether the targets are appropriate in the light of, for example, the more recent Welsh Government population and household projections, the methodology for calculating a 5-year housing supply and past building rates. These are factors that suggest that the LDP needs revising, along with the fact that the current LDP is not meeting its targets or achieving a 5-year housing supply, which may necessitate additional site allocations. The future level of housing growth will be a matter for any LDP revision. The RR acknowledges (para 3.3 .8) that there is a need to consider revisions to the rural housing policies and/or how they are implemented, although within a general context that the primary aim of the Main Village allocations is to make provision of affordable housing for local people living in the rural parts of the County.</p>	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
53.4	Barton Willmore	Disagree	<p>Paragraph 3.2 .9 of the Draft Review Report refers to the economic recession having residual effects on the rate of housing delivery in Monmouthshire. Whilst wider economic factors will have a direct bearing on the delivery of allocated sites, it is considered that the impacts of the recessions (which officially ended some time ago) are overstated. Given the slippage of the strategic sites and the impact this has had on the delivery of the Plan’s objectives these sites should be fully scrutinised and assessed in terms of their viability and deliverability. Whilst the Draft Review Report identifies that a number of allocated strategic sites have obtained planning permission, the Inspector’s Report to the LDP noted that “the fact that a planning application has been submitted does not conclusively demonstrate deliverability”. Accordingly, these sites should also be subject to a further up-to-date assessment of viability and deliverability, which has regard to the Welsh Government’s ‘Longitudinal Viability Study of the Planning Process’ (February 2017). Policy considerations relating to the impact of the removal of the Severn Bridge tolls, alongside wider economic aspirations (such as the Cardiff Capital Region City Deal and Welsh Government Metro proposals), and the need for these to align with housing provision will need to be reflected within</p>	<p>Comments noted. With regard to economic and market conditions it is recommended that a change be made to para. 2.1.4 (see Rep. no. 39.1).The RR acknowledges that there is a need to re-assess undelivered housing allocations. The Welsh Government has not yet responded to ‘Longitudinal Viability Study of the Planning Process’ (February 2017). It is difficult, therefore, to know how to address it at this stage. The matters referred to, e.g. the removal of the Severn Bridge tolls, are matters to be considered in any LDP Revision.</p>	<p>Amend para 2.1.4 as in Rep. No. 39.1.</p>

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
			the LDP Review. Support the need to review existing Identified Industrial and Business sites, and the opportunity to consider whether any sites should be de-allocated or re-allocated for a different use. Support the Plan's renewable energy evidence base being updated and areas of search for local authority scale renewable energy being explored through this process.		
55.3	Abergavenny Transition Town (Late Rep)	Disagree	There is a complacency in the Draft Review when it states that all design and heritage policies have been functioning entirely effectively. A brief visit to local sites would demonstrate a breakdown of many of those policies. The beginnings of change are on the horizon with proper Pre App procedures with developers being piloted and conversations beginning on Urban Frameworks being drawn up on sites for the future and written into the LDP as guidance. So some re-writing of the LDP will be required to make sure that all carries through. It is welcome that proper visualisation of projects is now being expected by the Planning department.	Comments noted. They appear to relate to how existing policies are implemented but policy wording can be considered further in any LDP revision.	No change to the RR.
57.2	Usk Town Council (Late Rep)	Agree	Agree with the potential changes identified in the report.	Agreement noted.	No change to the RR.
60.3	St Arvans Community Council (Late Rep)	Agree		Agreement noted.	No change to the RR.

## Q5 (Section 5): Do you agree that the LDP needs to be revised? If so do you think that a short form procedure or full revision procedure should be followed?

Rep No	Representor	No Revision/Short Form/Full	Comment	LPA Response	Recommendation
1.7	Chepstow Society	Full	More effort needed to align with neighbouring authority plans. Nothing said in plan about consultation with FoDC or Gloucestershire CC. The SE corner of the County needs to consult with all of its neighbours.	It is noted that the respondent supports a Full revision of the LDP. Liaison with neighbouring authorities will be necessary in any LDP revision process.	RR to be amended to make a recommendation on whether or not a LDP revision should take place and, if so , whether it should be a short form revision or a full revision.
4.5	Heine Planning	Full	Fully support immediate and full review to ensure all housing needs are addressed but in particular those of Gypsy and Travellers. Clearly there is no justification for anything short of a full review.	It is noted that the respondent supports a Full revision of the LDP, specifically because of the need to address housing needs of gypsies and travellers.	RR to be amended to make a recommendation on whether or not a LDP revision should take place and, if so , whether it should be a short form revision or a full revision.

Rep No	Representor	No Revision/Short Form/Full	Comment	LPA Response	Recommendation
7.5	Mr Alan Horne	Full	The balance between land allocated for employment and for homes should be reviewed. Land allocated for employment should take into account modern working practices especially home working and Ecommerce. Land allocated for employment, if close to existing employment sites, should be considered for affordable homes. This would also assist people to live closer to their work and reduce travel.	It is noted that the respondent supports a Full revision of the LDP., the main concern appearing to be the potential for deallocation of employment land. This will be a matter to be considered in any LDP revision.	RR to be amended to make a recommendation on whether or not a LDP revision should take place and, if so , whether it should be a short form revision or a full revision.

Rep No	Representor	No Revision/Short Form/Full	Comment	LPA Response	Recommendation
9.5	SA Brain & Co Ltd	Full	<p>Essential the LDP is reviewed to meet Welsh Government Regulations and ensure provision is made to extend the plan period beyond its expiry in 2021. A full review should take place because the existing strategy is not working, it is failing to deliver its housing strategy because of over reliance on strategic sites and under provision in other settlements, as well as there being a requirement for updated housing requirements and land allocations to the end of the revised plan period to 2036. Review will need to include provision for a realistic level of housing that will meet current and future housing requirements and ensure that there is adequate flexibility in the housing supply to maintain a 5 year supply of housing land. Support allocations of strategic sites and acknowledge their importance however, there is a need to utilise different sources to meet housing land supply and not only focus on the main towns but also allow allocations in the lower tier settlements.</p>	<p>It is noted that the respondent supports a Full revision of the LDP, considering that the existing LDP strategy is not working..</p>	<p>RR to be amended to make a recommendation on whether or not a LDP revision should take place and, if so , whether it should be a short form revision or a full revision.</p>

Rep No	Representor	No Revision/Short Form/Full	Comment	LPA Response	Recommendation
10.3	Natural Resources Wales	Full	Support the conclusions under section 5. A full revision appears logical and reasonable.	It is noted that the respondent supports a Full revision of the LDP	RR to be amended to make a recommendation on whether or not a LDP revision should take place and, if so , whether it should be a short form revision or a full revision.

Rep No	Representor	No Revision/Short Form/Full	Comment	LPA Response	Recommendation
12.5	RPS Planning	Full	<p>Support given to the reasoning set out in support of the Full Review of the Plan. The 2016 and 2017 Annual Monitoring Reports provided the evidence in support of an early review of the LDP in order to address the shortfall in housing land supply and to identify and allocate additional sites. The review should support already allocated sites which are already delivering housing in accordance with their planning permissions so as to not frustrate their supply through reserved matters or discharge of conditions processes. It is considered sensible to undertake a full review of the LDP to ensure all strategies and policies are kept up to date, based on the latest evidence to support the future supply of housing. A pragmatic approach to housing land supply should also be factored into the Review which allows for planning permission to be achieved on preferred development sites in advance of the LDP's adoption to ensure a 5-year land supply can be achieved/maintained on adoption of the plan and during the plan period.</p>	<p>It is noted that the respondent supports a Full revision of the LDP, although the support of the existing LDP spatial strategy and promotion of a new site in Abergavenny might have suggested that a short form revision would meet the respondent's concerns.</p>	<p>RR to be amended to make a recommendation on whether or not a LDP revision should take place and, if so, whether it should be a short form revision or a full revision.</p>



Rep No	Representor	No Revision/Short Form/Full	Comment	LPA Response	Recommendation
13.5	Ward Estates Ltd	Full	Agree that it is essential that the LDP is reviewed to meet Welsh Government Regulations and to ensure that provision is made to extend the Plan Period beyond the current period which is due to expire in 2021. Also consider that a Full Review should take place because the existing strategy is not working as it is failing to deliver its housing strategy because of over reliance on strategic sites and because there will be a requirement for updated housing requirements and land allocations to the end of the revised plan period in 2036.	It is noted that the respondent supports a Full revision of the LDP.	RR to be amended to make a recommendation on whether or not a LDP revision should take place and, if so , whether it should be a short form revision or a full revision.

Rep No	Representor	No Revision/Short Form/Full	Comment	LPA Response	Recommendation
--------	-------------	-----------------------------	---------	--------------	----------------

13.5		Full	<p>The LDP provides an overarching and comprehensive land use-planning framework for Monmouthshire and as part of that Strategy and objectives the delivery of housing is a crucial element for the Council. Progress on Strategic Sites is not being made nor delivered as anticipated in the adopted Plan and as a consequence there is a shortage in the 5 year housing land supply. The LDP Review will need to include a provision for a level of housing that will be realistic and appropriate to meet current and future housing requirements and ensure that there is adequate flexibility to maintain a 5 year supply of housing land.</p>		
------	--	------	--	--	--

Page 302

Rep No	Representor	No Revision/Short Form/Full	Comment	LPA Response	Recommendation
15.5		Full	Further justification for a MCC only LDP should be provided in light of WG Minister Lesley Griffiths letter issued in December 2017 regarding joint working with neighbouring authorities and the production of Strategic Development Plans. It is however considered that MCC needs to commence with a full review of the plan as soon as possible. MCC cannot afford to wait for joint working to put a plan in place given the current housing	Comments noted. The RR will be amended to further address the issue of joint working etc., although the respondent appears to support the Council's current position that a joint plan is not appropriate at the present time.	The RR to be amended to further address the issues of joint working etc.
15.5	Bovis Homes (RPS)	Full	Support given to the reasoning for a Full Review of the Plan. The 2016 and 2017 Annual Monitoring Reports provided the evidence in support of an early review of the LDP in order to address the shortfall in housing land supply and to identify and allocate additional sites. The review should also support allocated sites which are already delivering housing in accordance with their planning permissions so as to not frustrate their supply through reserved matters or discharge of conditions processes.	It is noted that the respondent supports a Full revision of the LDP.	RR to be amended to make a recommendation on whether or not a LDP revision should take place and, if so, whether it should be a short form revision or a full revision.

Rep No	Representor	No Revision/Short Form/Full	Comment	LPA Response	Recommendation
15.5		Full	Given the time it takes for LPAs to prepare and adopt LDP's, it is considered sensible to undertake a full review of the LDP to ensure all strategies and policies are kept up to date, based on the latest evidence to support the future supply of housing. A pragmatic approach to housing land supply should also be factored into the LDP Review allowing planning permission to be achieved on preferred development sites in advance of the LDP's adoption to ensure a 5-year land supply can be achieved/maintained on adoption of the plan and during the plan period.		
16.5		Full	Cannot support a short form revision based on a housing requirement derived from more recent population and household formation projections, as these are likely to be reflective of house price increases that are preventing new households being formed. Ought properly to be considered through updated housing market assessment work to inform a full revision of the Plan.		

Rep No	Representor	No Revision/Short Form/Full	Comment	LPA Response	Recommendation
16.5		Full	The reduction and eventual removal of the Severn Bridge tolls will inevitably have an impact on the County generally, and Chepstow in particular, in terms of development pressures, given the proximity to Bristol and the wider South West region. Furthermore, the house price evidence clearly indicates that affordability in the County will progressively become a significant problem, especially for economically active younger people, if this is not addressed through additional housing supply.		
16.5		Full	Since adoption a number of legislative and policy changes have been made that alter the national, regional and local context to the Plan e.g. the Cardiff Capital Region and City Deal initiative. The resulting economic investment will provide a significant opportunity for Monmouthshire.		

Rep No	Representor	No Revision/Short Form/Full	Comment	LPA Response	Recommendation
16.5	Bovis Homes (Walsingham Planning)	Full	Planning Policy Wales (November 2016) makes it clear at paragraph 2.12.1 that to ensure that the LDP is kept up to date an authority should commence a more thorough full review of its LDP at least once every four years following adoption.	It is noted that the respondent supports a Full revision of the LDP. The level of housing growth required will be a matter to be considered in any LDP Revision,	RR to be amended to make a recommendation on whether or not a LDP revision should take place and, if so , whether it should be a short form revision or a full revision.

16.5		Full	A full revision should be commenced so that a new adopted LDP is in place upon expiry of the current Plan in December 2021. The Review Report notes that Welsh Government officers have advised that they would not support the Council in undertaking a short form revision of the Plan.		
------	--	------	---	--	--

Page 306

Rep No	Representor	No Revision/Short Form/Full	Comment	LPA Response	Recommendation
20.5	Hallam Land Management (Asbri)	Full	<p>The LDP is in need of a review as the current plan will be time expired in 2021. The decision to start on the review process is therefore supported.</p> <p>The main priority should be to identify new sites in line with a strategy which continues to focus on the main towns with a proportionate distribution elsewhere. Ultimately it is likely that the Welsh Government will determine that a Full Review is required.</p>	<p>It is noted that the respondent supports a Full review of the LDP, although the support for the existing spatial strategy could suggest that a short form review might be appropriate.</p>	<p>RR to be amended to make a recommendation on whether or not a LDP revision should take place and, if so , whether it should be a short form revision or a full revision.</p>

Rep No	Representor	No Revision/Short Form/Full	Comment	LPA Response	Recommendation
21.5	Hallam Land Management (Boyer)	Full	Agree that it is essential that the LDP is reviewed to meet Welsh Government Regulations and to ensure that provision is made to extend the Plan Period beyond the current period which is due to expire in 2021. Also consider that a Full Review should take place because the existing strategy is not working as it is failing to deliver its housing strategy because of the over reliance on Strategic Sites and because there will be a requirement for updated housing requirements and land allocations to the end of the revised plan period in 2036. The Review will need to include a provision for a level of housing that will be realistic and appropriate to meet current and future housing requirements and ensure that there is adequate flexibility in the housing supply to maintain a 5 year supply of	It is noted that the respondent supports a Full revision of the LDP.	RR to be amended to make a recommendation on whether or not a LDP revision should take place and, if so , whether it should be a short form revision or a full revision.



Rep No	Representor	No Revision/Short Form/Full	Comment	LPA Response	Recommendation
21.5		Full	Whilst it is noted that there has been a failure in the Strategy the focus of delivering growth within the Main Towns should remain an essential priority for the revised LDP Strategy as part of the Full Review process. These Main Town areas provide an important role within Monmouthshire given they are the County's most sustainable settlements, where there is the greatest potential to support new housing, jobs, services, community facilities and public transport.	It is noted that the respondent supports the existing LDP's spatial strategy of focusing growth on the County's Main Towns.	No change to the RR.
22.5	Redrow Homes	Full	Fully support the full review to ensure all matters are appropriately considered to inform a development plan covering up to 2036.	It is noted that the respondent supports a Full revision of the LDP.	RR to be amended to make a recommendation on whether or not a LDP revision should take place and, if so, whether it should be a short form revision or a full revision.

Rep No	Representor	No Revision/Short Form/Full	Comment	LPA Response	Recommendation
23.5	Richborough Estates (Turley)	Full	<p>Agree that the adopted LDP needs to be revised, also support a full revision of the LDP, rather than a 'selective review'. The adopted LDP has a relatively short plan period given the time required to progress through the various plan making stages, it is essential that the review process commences now. Without doing so, there is a likelihood that the Council will not be able to rely upon an up to date Development Plan after 2021. The need to review the LDP is supported by the Council's AMR (in both 2016 and 2017), which has recommended that the LDP is reviewed to address the shortfall in housing land supply and facilitate the identification/allocation of additional housing land.</p>	<p>It is noted that the respondent supports a Full revision of the LDP.</p>	<p>RR to be amended to make a recommendation on whether or not a LDP revision should take place and, if so , whether it should be a short form revision or a full revision.</p>

Rep No	Representor	No Revision/Short Form/Full	Comment	LPA Response	Recommendation
23.5		Full	<p>Undertaking a full revision, rather than a 'Short Form' version, will ensure that the LDP considers, and addresses, all factors rather than focusing solely on housing supply. This is important given the interaction between housing supply and other aspects of the LDP. This includes policies ranging from the overall spatial strategy to economic aspirations, infrastructure requirements and environmental/landscape designations. As such, a piecemeal, 'short form' review would not be appropriate in this instance. A full review would provide an opportunity to address issues including a too short plan period and an over dependency on a limited number of strategic sites. A full review will also enable the LDP to reflect important contextual changes such as the Cardiff Capital Region City Deal and other economic/market influences.</p>		

Rep No	Representor	No Revision/Short Form/Full	Comment	LPA Response	Recommendation
24.5	Mrs Carolyn Ovenden	Full	In light of Severn Bridge toll-removal, Monmouthshire will be subject to great change in the next few years. A full review will take time and some of these changes will become more apparent by the time a full review is made. Then a new full LDP will not have to be subject to another costly interim review.	It is noted that the respondent supports a Full revision of the LDP.	RR to be amended to make a recommendation on whether or not a LDP revision should take place and, if so , whether it should be a short form revision or a full revision.
28.5	Llangybi Community Council	Full	The number of targets that are not being achieved are such that a full revision of the LDP is required.	It is noted that the respondent supports a Full review of the LDP.	RR to be amended to make a recommendation on whether or not a LDP revision should take place and, if so , whether it should be a short form revision or a full revision.
33.5	Abergavenny Town Council	Full	Do not consider that MCC has a choice if WG have advised that they will not support a short form revision	Comment noted.	RR to be amended to make a recommendation on whether or not a LDP revision should take place and, if so , whether it should be a short form revision or a full revision.

Rep No	Representor	No Revision/Short Form/Full	Comment	LPA Response	Recommendation
34.4	Barratt David Wilson Homes	Full	Support a full revision to define new, deliverable housing allocations that are financially viable. For the reasons outlined would resist a reduction of the overall housing target resulting from trend-based housing projections, particularly in light of wider policy aspirations of the Welsh Government and the Cardiff Capital Region. Would welcome the opportunity to discuss proposed housing allocations in terms of their viability and deliverability, this would help to ensure that future allocations are fit for purpose and make a meaningful contribution to the Council's overall housing target.	It is noted that the respondent supports a Full revision of the LDP. The level of housing growth required will be a matter to be considered in any LDP Revision	RR to be amended to make a recommendation on whether or not a LDP revision should take place and, if so, whether it should be a short form revision or a full revision.

Rep No	Representor	No Revision/Short Form/Full	Comment	LPA Response	Recommendation
36.5	East Mon Industrial Holdings Ltd (WYG)	Full	<p>The end date of the current plan is 2021, as such, an adopted revised LDP will be required to be in place within 3-4 years. If a shortform review is undertaken this risks a significant and long-term policy vacuum.</p> <p>Furthermore, undertaking short-form revision is not appropriate as it will not be possible to restrict the review to identification of new sites in line with the existing strategy. Significant changes to the level and spatial distribution of growth will be required in order to prepare a deliverable plan to 2036. The extended plan period to 2036 is supported, and associated updated land requirements will result in substantive changes to the LDP Strategy, thereby necessitating full review.</p>	It is noted that the respondent supports a Full revision of the LDP.	RR to be amended to make a recommendation on whether or not a LDP revision should take place and, if so , whether it should be a short form revision or a full revision.

Rep No	Representor	No Revision/Short Form/Full	Comment	LPA Response	Recommendation
39.5	Home Builders Federation	Full	The reason for WG not being willing to support a short form revision to the plan should be included in the text. Support the plan being able to be revised as quickly as possible as this should help resolve the lack of a five year lands supply. However due to the number of issues identified in the report and the rapidly changing wider economic environment support a full revision of the plan.	<p>It is noted that the respondent supports a Full revision of the LDP. The Welsh Government (WG) has indicated in that it will not support a short form revision for the following reasons: 'The AMR indicates that the delivery of housing is falling well below the anticipated annual rate and the strategic sites are not being delivered as planned (in terms of timing). The combination of these two issues appear as going to the heart of the plan which would not merit a short form review procedure; A short form revisions would be a high risk strategy in terms procedurally, potentially raising questions of 'soundness' and placing adoption of the plan at high risk'.</p> <p>Nevertheless, the regulations allow for a short form revision and it is considered necessary for the RR to address this and leave the option open. To avoid unrealistic expectations it was considered necessary to flag up that a short form revision is unlikely to be acceptable to the WG.</p>	RR to be amended to make a recommendation on whether or not a LDP revision should take place and, if so, whether it should be a short form revision or a full revision.

Rep No	Representor	No Revision/Short Form/Full	Comment	LPA Response	Recommendation
41.5	Philippa Cole	Full	It would be a duplication of resources to undertake a partial review at this time.	It is noted that the respondent supports a Full revision of the LDP.	RR to be amended to make a recommendation on whether or not a LDP revision should take place and, if so, whether it should be a short form revision or a full revision.
45.5	Bovis Homes Group (Lichfields)	Full	Consider that there should be a full review of the Local Plan in accordance with government guidance for a full review every four years. This will ensure that the review of the level of housing requirement is considered against other key factors such as an updated strategy that reflects the employment and economic growth aspirations from the regional City Deal.	It is noted that the respondent supports a Full revision of the LDP, although it a Full review that is required every four years. This Full review report will be making a recommendation on the next step to take - the form of revision that may be required.	RR to be amended to make a recommendation on whether or not a LDP revision should take place and, if so, whether it should be a short form revision or a full revision.
46.5	Llanover & Coldbrook Estate (LRM Planning)	Full	Agree that the plan needs to be reviewed and consider that due to the short timeframe left of the existing plan it is prudent to extend the period to 2036. Consider that given the timeframe involved and the future socio-economic well being of the Authority this requires a Full Revision.	It is noted that the respondent supports a Full revision of the LDP.	RR to be amended to make a recommendation on whether or not a LDP revision should take place and, if so, whether it should be a short form revision or a full revision.



Rep No	Representor	No Revision/Short Form/Full	Comment	LPA Response	Recommendation
47.5	Taylor Wimpey (Turley)	Full	<p>There is no doubt that there is a need for a full review of the LDP. To underestimate the scale of revision needed to the plan, or to limit the scope of review could result in the need for further review sooner than would be necessary if the LDP were not properly reviewed now. That is not to say that any LDP review should not be expedited, given the importance of the issues to the ongoing health and success of the County and its main towns, and the significant under performance provided by the LDP since adoption. A piecemeal review is not appropriate, the interrelated nature of the policies that need to be reviewed, and consequences of the level of change required, is significant justification for the need to review the plan as a whole. This review should include amendments to Policy S1 regarding Development Boundaries, Policy S2 regarding the level of housing provision, Policy S3 regarding the identification of Strategic Housing Sites and Policy LC6 in respect of Green Wedges. Furthermore, the full review should learn the lessons experienced since the adoption of the current LDP, namely that it covers too short a plan period and has an over dependency on a limited number of strategic sites. The plan period should be at least until</p>	<p>It is noted that the respondent supports a Full revision of the LDP. The matters raised are matters to be considered in any LDP revision.</p>	<p>RR to be amended to make a recommendation on whether or not a LDP revision should take place and, if so, whether it should be a short form revision or a full revision.</p>

Rep No	Representor	No Revision/Short Form/Full	Comment	LPA Response	Recommendation
			2036.		
48.5	Llanarth Estates (WPM Planning)	Full	It is considered that a full revision is required to enable the issues raised in this representation to be assessed fully and revised accordingly.	It is noted that the respondent supports a Full revision of the LDP.	RR to be amended to make a recommendation on whether or not the LDP spatial strategy needs revising and to consider the implications for the form of any LDP revision
52.5	Morris' of Usk (WPM Planning)	Full	It is considered that a full revision is required to enable the issues in housing delivery to be assessed fully and revised accordingly.	It is noted that the respondent supports a Full revision of the LDP.	RR to be amended to make a recommendation on whether or not a LDP revision should take place and, if so , whether it should be a short form revision or a full revision.

Rep No	Representor	No Revision/Short Form/Full	Comment	LPA Response	Recommendation
53.5	Barton Willmore	Full	<p>A Full Revision of the LDP is required to address the shortfall of housing land supply caused by the failure to deliver the levels of housing growth set out in the Plan, and to facilitate the identification and allocation of additional housing land. The level and distribution of growth will need to have regard to the impacts of the removal of the Severn tolls, and to align with the significant economic aspirations for the region and Authority are .</p> <p>Notwithstanding this note that Lesley Griffiths AM recently wrote to the Council inviting a proposal for an SDP for the South East Wales region. Consider that a Full Revision to the LDP should be undertaken in addition to progressing a SDP. This would help deliver an effective decision making framework and facilitate acceptable development of strategic importance without leaving a policy vacuum.</p>	It is noted that the respondent supports a Full revision of the LDP. The RR will be amended to further address the issues of joint working and the implications of a SDP, although the respondent appears to support the Council going ahead with a Full LDP review in advance of a SDP.	RR to be amended to make a recommendation on whether or not a LDP revision should take place and, if so, whether it should be a short form revision or a full revision. The RR to be amended to further address the issues of joint working and relationship with the SDP.
56.4	Monmouth Town Council (Late Rep)	Full	Given the above a full revision needs to be considered	It is noted that the respondent supports a Full revision of the LDP.	RR to be amended to make a recommendation on whether or not the LDP spatial strategy needs revising and to consider the implications for the form of any LDP revision.

Rep No	Representor	No Revision/Short Form/Full	Comment	LPA Response	Recommendation
57.3	Usk Town Council (Late Rep)	Full		It is noted that the respondent supports a Full revision of the LDP.	RR to be amended to make a recommendation on whether or not a LDP revision should take place and, if so , whether it should be a short form revision or a full revision.
60.4	St Arvans Community Council (Late Rep)	No Revision	See previous answer on failed objectives.	It is noted that the respondent supports no revision of the LDP.	RR to be amended to make a recommendation on whether or not a LDP revision should take place and, if so , whether it should be a short form revision or a full revision.
2.3	Pontypool Park Estate	Short Form		It is noted that the respondent supports a short form revision of the LDP.	RR to be amended to make a recommendation on whether or not a LDP revision should take place and, if so , whether it should be a short form revision or a full revision.
3.5	Trustees of the Late Mrs H M Langham	Short Form	Policy SAH11 needs to be revised and the Plan's residential site allocation policies amended. Main Village allocations could then potentially be "viable and deliverable". Evidence suggests this is not the current case.	It is noted that the respondent supports a short form revision of the LDP, the main concern appearing to be the failure of Main Village sites to come forward.	RR to be amended to make a recommendation on whether or not a LDP revision should take place and, if so , whether it should be a short form revision or a full revision.

Rep No	Representor	No Revision/Short Form/Full	Comment	LPA Response	Recommendation
11.5	Mr Paul Cawley	Short Form	Will allow the Authority to consider and supplement the LDP with new sites resolving many of the issues the Authority currently has in respect of the target of 4500 dwelling by 2021.	It is noted that the respondent supports a short form revision of the LDP, although this seems to contradict the respondent's view that the spatial strategy needs revising, which is unlikely to be appropriate for a short form revision. A short form revision would have to extend beyond 2021 as there is a requirement to have a 10 year plan period at adoption.	RR to be amended to make a recommendation on whether or not a LDP revision should take place and, if so , whether it should be a short form revision or a full revision.
26.5	Cllr Louise Brown	Short Form	If the population projections are lowered as 2008 figures are too high then instead of just a 4 year supply this may then bring it in line with a 5 year supply without the necessity for a full revision, so a short revision would do and would mean that the allocated sites were sufficient without looking for additional sites.	It is noted that the respondent supports a short form revision of the LDP.	RR to be amended to make a recommendation on whether or not a LDP revision should take place and, if so , whether it should be a short form revision or a full revision.

Rep No	Representor	No Revision/Short Form/Full	Comment	LPA Response	Recommendation
31.5	Mr Adrian Lewis	Short Form	Revision for population growth and housing demand and distribution of affordable homes. It would help residents to understand the split within affordable homes such as tenants that have a vested interest in the value of the property and those who are on rental paid by welfare or otherwise. The largest anti-social issue, as I understand it, come from the latter group. Increasing their number will effectively be against the LDP vision that people live in more inclusive, cohesive, prosperous and vibrant communities. The greater the concentration of rental homes has the potential to create a 'ghetto' environment of anti-social behaviour.	It is noted that the respondent supports a short form revision of the LDP. The Affordable Housing SPG sets out details of the type of affordable housing preferred in Monmouthshire, which is 'tenure neutral' offering flexibility between social rent and low home ownership.	RR to be amended to make a recommendation on whether or not a LDP revision should take place and, if so, whether it should be a short form revision or a full revision.
32.5	Mr Rees Williams	Short Form	The majority findings are acceptable but again housing / land requirements need correction.	It is noted that the respondent supports a short form revision of the LDP to deal with the housing supply situation.	RR to be amended to make a recommendation on whether or not a LDP revision should take place and, if so, whether it should be a short form revision or a full revision.

Page 322

Rep No	Representor	No Revision/Short Form/Full	Comment	LPA Response	Recommendation
37.5	Abergavenny & District Civic Society	Short Form	<p>Extension of the plan to 2026 appears to be adequate at present, if Welsh Government will allow this. A short revision is unlikely to require substantial allocations of new housing land or a new spatial strategy, but it may enable some other revisions and would avoid a policy vacuum. It also provides breathing space for regional and inter-regional needs to be assessed, including those arising from the removal of Severn bridge tolls, and possibly for a modified spatial strategy to be put forward in a subsequent full revision. Note that the council is expected to respond on joint LDP revision with neighbouring authorities and a SE Wales Strategic Development Plan. Considerations of cost, capacity and speed underlie the Secretary's invitation. The draft Review deals with such considerations rather inadequately: the justifications for rejecting joint planning with neighbouring authorities are limited and rather weak, failing to address the fact that local housing market areas cross boundaries. Furthermore, the report does not explain the reasoning behind the Welsh Government advice that a short revision would not be supported. Due to the political and practical challenges of collaboration do not believe that a joint LDP revision</p>	<p>It is noted that the respondent supports a short form revision of the LDP. The RR will be amended to further address the issues of joint working etc., although the respondent appears to support the Council's current position that a joint plan is not appropriate at the present time.</p>	<p>RR to be amended to make a recommendation on whether or not a LDP revision should take place and, if so, whether it should be a short form revision or a full revision. The RR to be amended to further address the issues of joint working etc.</p>

Rep No	Representor	No Revision/Short Form/Full	Comment	LPA Response	Recommendation
			could be adopted in time to avoid a policy vacuum after 2021, and therefore support a speedy short revision to extend the Monmouthshire LDP to 2026. This would allow time to make progress on a SE Wales Strategic Development Plan providing a context for a joint LDP with neighbouring authorities extending to 2036. However, fear that a joint LDP will be less tuned to the needs of Monmouthshire's towns and countryside and that the people of the county will have less influence on the plan's policies and proposals. Place Plans for towns and villages will be more important .		
40.5	Magor with Undy Community Council	Short Form	As the objectives of the LDP already meet or are compatible with the Well-Being of Future Generations Act and the Local Well-Being Plan, the short form revision will allow the Authority to fast-track consideration of, and supplement the LDP with new sites resolving many of the issues they currently have in respect of the target of 4500 dwellings by 2021	It is noted that the respondent supports a short form revision of the LDP. However, the respondent considers that the spatial strategy should be revised which would require a full revision.	RR to be amended to make a recommendation on whether or not a LDP revision should take place and, if so , whether it should be a short form revision or a full revision.



Rep No	Representor	No Revision/Short Form/Full	Comment	LPA Response	Recommendation
50.5	Mrs Evelyn Birden (Newland Rennie)	Short Form	In the main the policies remain relevant subject to comments made.	It is noted that the respondent supports a short form revision of the LDP.	RR to be amended to make a recommendation on whether or not a LDP revision should take place and, if so , whether it should be a short form revision or a full revision.
51.5	Dr David Rosser (Newland Rennie)	Short Form		It is noted that the respondent supports a short form revision of the LDP.	RR to be amended to make a recommendation on whether or not a LDP revision should take place and, if so , whether it should be a short form revision or a full revision.

Rep No	Representor	No Revision/Short Form/Full	Comment	LPA Response	Recommendation
55.4	Abergavenny Transition Town (Late Rep)	Short Form	LDP needs some revision. It is reported that Welsh Government (WG) suggests a Short Review is not acceptable but no rationale is given for that position. This needs to be made explicit for it to be considered. Aware of WG's merger/ joint-working pressures for the 22 authorities in Wales. The decision of whether to go for a Short or Full Revision has to be taken in the light of this ongoing policy debate and its likely timescale of resolution. Also the ending of the Severn Bridge Tolls, and the roll out of the Metro project will inevitably have considerable mid-term impacts on the county. These need to be mapped, researched and understood on a regional basis, but this will take time. Equally there is work to do on a South East Wales Strategic Development Plan, another joint venture which also takes time.	<p>It is noted that the respondent supports a Full revision of the LDP. The Welsh Government (WG) has indicated in that it will not support a short form revision for the following reasons: 'The AMR indicates that the delivery of housing is falling well below the anticipated annual rate and the strategic sites are not being delivered as planned (in terms of timing). The combination of these two issues appear as going to the heart of the plan which would not merit a short form review procedure; A short form revisions would be a high risk strategy in terms procedurally, potentially raising questions of 'soundness' and placing adoption of the plan at high risk'.</p> <p>Nevertheless, the regulations allow for a short form revision and it is considered necessary for the RR to address this and leave the option open. To avoid unrealistic expectations it was considered necessary to flag up that a short form revision is unlikely to be acceptable to the WG.</p>	RR to be amended to make a recommendation on whether or not a LDP revision should take place and, if so, whether it should be a short form revision or a full revision.

Rep No	Representor	No Revision/Short Form/Full	Comment	LPA Response	Recommendation
55.4		Short Form	<p>Not convinced by the rather weak arguments against joint planning with adjacent authorities in the Draft Review, given that many of the forces at work do not respect county boundaries . Should some collaborative planning work inevitably be done at a more regional level at some point in the future, this will necessitate an urgent putting in place of mechanisms to protect 'localism' now, in the short term. As the centre of policy decision-making on planning inevitably moves to a more strategic level, before such merger work comes about, proper Place Plans, Urban frameworks for sites in main settlements, more town-by-town careful analysis of employment and housing needs, more town visions, urgently have to be put in place to ensure a sound civic ownership. This can be done by a Short, focussed, Review process. It will also allow some of the recent submissions on the MCC Well Being Plan, that have been sent in parallel to this process, to be considered in the light of the above. All these things lead to the conclusion that a Short Review is the best option, so that some critical new policies could be put in place quickly, and this would avoid a potential policy vacuum after 2021. The Short review would take us up to 2026 and a Full Review with the</p>	<p>The RR will be amended to further address the issues of joint working, regional planning etc. Procedures for community participation in any LDP review remain to be determined. To be adopted as Supplementary Planning Guidance (SPG) a Place Plan would need to support and expand on policies in an adopted development plan – ‘a means of setting out more detailed thematic or site specific guidance on the way in which the policies of an LDP are to be interpreted and applied in particular circumstances or areas.’ (PPW, ed. 9, para. 2.3.1 . This suggests a sequential approach – an adopted LDP is followed by an adopted SPG. To be adopted as SPG a Place Plan would also need to focus on spatial matters. The relationship between any Place Plan and a revised LDP, therefore, is a matter that would require careful consideration. Whether or not the revision is a short form or full is not felt to have any implications for any such relationship, as the LDP will need to cover County wide matters, irrespective of any Place Plan production in particular communities. It would not be possible for a short form revision to cover up to 2026 as there is a requirement to ensure that there is 10 years of the plan period remaining on adoption.</p>	<p>The RR to be amended to further address the issues of joint working, relationship to regional planning etc.</p>

Rep No	Representor	No Revision/Short Form/Full	Comment	LPA Response	Recommendation
--------	-------------	-----------------------------	---------	--------------	----------------

other bigger picture matters clearer and resolved, could then take us through to 2036.

Page 328

## Further Comments

Rep No	Representor	Comment	LPA Response	Recommendation
1.8	Chepstow Society	Publicity about plan and its effects has been weak. Things need to happen in the Chepstow/Caldicot area of the County as the removal of the tolls is an opportunity that should be taken up. Must be ready for an influx of new people and traffic.	Comment noted. These are matters that will be considered in any LDP revision. Consultation on the Draft Review Report is not a statutory requirement, however, we will seek to engage with communities as part of any plan revision.	No change to the RR.
3.6	Trustees of the Late Mrs H M Langham	Previous comments made in response to consultation on the Affordable Housing SPG highlight and reinforce the problems in delivery of Main Village sites. Their potential development requires amendment of Policy SAH11. The "pragmatic" approach to departure applications referred to in 3.2 .19 should be used in Main Villages, with each site considered on its merits and not bound by current policy constraints. Anxious to promote allocated site SAH11(xi) but site is not "viable and deliverable" for developers.	Comment noted. The RR acknowledges (para 3.3 .8) that there is a need to consider revisions to the rural housing policies and/or how they are implemented, although within a general context that the primary aim of the Main Village allocations is to make provision of affordable housing for local people living in the rural parts of the County. The suitability of any specific site for re-allocation or de-allocation will be a matter for any LDP revision.	No change to the RR.
4.6	Heine Planning	Council recognise policy was not informed by an up to date need assessment but fail to mention the additional site at Llanccayo, since dismissed on appeal but the need for the family was acknowledged. Need to address their needs and possibly those of others whose needs were not identified including possible in migration. Clear guidelines needed of the process and timetable for new site provision.	Comments noted. The RR recognises that any LDP revision will need to give further consideration to addressing any unmet need for the provision of gypsy and traveller sites.	Paragraph 3.3.13 of the RR to be amended to refer to Llanccayo.

Rep No	Representor	Comment	LPA Response	Recommendation
5.1	Tintern Community Council	Pleased to note the proposed changes in criteria with regard to housing policies, have previously highlighted several sites within the community council area which were felt to be appropriate for low-cost housing. These were discounted for various reasons but may be suitable in future if conditions have been relaxed.	Comment noted, although if the sites referred to were discounted because of detailed planning reasons then any LDP revision is unlikely to alter the position. The suitability, or otherwise, of any potential candidate site would be a matter for any LDP revision.	No change to the RR.
7.6	Mr Alan Horne	Consideration should be given to a wholesale review as to how the key objectives are met. The criteria for allocating employment land and land for homes should be reviewed. Over the past 10 years there has been a radical change in how we live our lives with the widespread delivery of broadband communications and access to the internet. The revised LDP has to step back and recognize the reality of modern living. It has to give planners flexibility to make changes in allocation of land to suit the needs of the local community, advances in technology and changes in working practices.	Comments noted. These are matters to be considered in any LDP revision.	No change to the RR.
9.6	SA Brain & Co Ltd	Do not consider that the Council should place too much reliance on the 2011 and 2014 projections there is a need to take an optimistic approach to population given the likely growth anticipated for Monmouthshire due to the abolition of the Severn Bridge Toll and the work being undertaken via the Cardiff Capital City Region Deal and, as such, should form part of the local housing market assessment.	Comment noted. The appropriateness, or otherwise, of the more recent Welsh Government population and household projections will be a matter to be considered in any LDP revision.	No change to the RR.

Rep No	Representor	Comment	LPA Response	Recommendation
10.4	Natural Resources Wales	Section 4 – Evidence Base Studies, recommend that Dwr Cymru/Welsh Water (DCWW) are consulted to ensure the provision of foul drainage to mains public sewer on allocated sites is feasible within their AMP programme. This will help prevent delays which have been experienced within the current LDP sites when connecting to the mains public sewer. Also recommend consideration is given to whether a Strategic Flood Consequences Assessment is required in accordance with section 10 of TAN15. This can assess risks and consequences of flooding across allocated sites. There is new flood data available which has been published since the adoption of the current LDP	Comments noted and will be considered in preparing evidence base for any LDP revision.	No change to the RR.
11.6	Mr Paul Cawley	Welcome the Short Form Review as it will allow landowners and developers the ability to offer up within a reasonable time-frame available land for development especially for the development of smaller clusters of dwellings eg 10 – 20. I have land available on the edge of a village development boundary for inclusion in the LDP for development	It is noted that the respondent supports a short form revision of the LDP, although this seems to contradict the respondent's view that the spatial strategy needs revising, which is unlikely to be appropriate for a short form revision. The suitability, or otherwise, of any potential candidate site will be a matter to be considered in any LDP revision, although it is acknowledged that a short form revision is likely to enable such sites to be brought forward more quickly.	RR to be amended to make a recommendation on whether or not a LDP revision should take place and, if so, whether it should be a short form revision or a full revision.

Rep No	Representor	Comment	LPA Response	Recommendation
13.6	Ward Estates Ltd	Consider that the Council should not place too much reliance on the 2011 and 2014 projections which reflect lower household formation rates during a period of recession. It is likely that the plan period will be extended to 2036 and it will be necessary to take into account a revised Local Housing Market Assessment, the Cardiff Capital Region City Deal and Future Monmouth. It is also likely that with the abolition of the Severn Bridge Toll the County will become a more popular place to live with higher levels of in migration. If insufficient account is taken of this pressure house prices will rise at a disproportionate rate and make it more difficult for local people to afford housing. The LDP Housing Requirement will therefore need to take a wide range of factors into consideration and not rely solely on the latest household projections.	Comment noted. The appropriateness, or otherwise, of the more recent Welsh Government population and household projections will be a matter to be considered in any LDP revision.	No change to the RR.
14.1		With regard to the specific corporate plans, strategies and priorities, given the close geographical relationship with neighbouring Local Authorities there is insufficient evidence currently expressed as to why a wider approach to planning cannot accommodate differences and commonalities. Considering issues on a wider basis could place the authority in a much stronger position to resolve planning issues and better reflect how people and businesses operate on a daily basis		



Rep No	Representor	Comment	LPA Response	Recommendation
14.1		<p>In terms of plan preparation timing, all parties already benefit from an adopted LDP. Neither authority is starting from scratch, rather updating the existing evidence and ensuring that a combined strategy reflects the wider geographical area. It remains unclear as to why this would require an elongated preparation time, even taking into account a slightly modified governance structure. Efficiencies should also be reflected in a governance approach. Again, this area will require further explanation and evidence as to why a Joint LDP is not appropriate</p>		
14.1		<p>Currently consider the Review Report inadequate regarding the evidence to support progressing a replacement LDP on an individual basis.</p>		

Rep No	Representor	Comment	LPA Response	Recommendation
14.1	Welsh Government	In light of the recent Written Statement and the letter from Lesley Griffiths AM, specific to Monmouthshire, wish to draw attention to the need to provide a robust analysis of the benefits of preparing a Joint LDP. Note that already undertake a large degree of joint working on the evidence base transcending administrative boundaries, but not clear why this cannot be translated into a Joint LDP. The ability to prepare a more holistic and consistent policy approach, following a single administrative process, should offer the ability to make a more effective and efficient use of resources and provide better planning outcomes across the wider area. If wish to retain single LDP approach a much more robust analysis illustrating clearly why such an approach would be more prudent than preparing a Joint LDP, both in terms of resource requirements and planning outcomes is required.	Comments noted. The written statement and letter from the Cabinet Secretary for Energy, Planning and Rural Affairs was received after the Draft Review Report was published for consultation. This matters contained in the written statement and letter will be addressed in the Review Report,	The RR to be amended to address the issues raised by WG.
16.6	Bovis Homes (Walsingham Planning)	In the context of a full revision of the LDP, which will need to identify new sites for housing, submit proposals to demonstrate that there is a robust planning case for the removal of the Green Wedge in respect of land to the west of Chepstow (to north of the A48) and the allocation of land as a strategic housing site.	The suitability, or otherwise, of any potential candidate site will be a matter for any LDP Revision.	No change to the RR.

Rep No	Representor	Comment	LPA Response	Recommendation
17.1	Goetre Fawr Community Council	There is much talk about other national plans in the document and a sense that there is lots of expansion of housing planned. The one area it appears to lack substance in is protection of the natural environment rather than exploiting what it has to offer which are two different things. Rural life is altering beyond most peoples expectations, there is little thought to accommodate those people who may not wish to be online for services. The sort of people who live in the village. What is in the plan that gives a 'quality' to a life lived in wales? The only focus is building more and more homes with little correlation to the resulting impact on health and social care services that will be required and education. Would like to see more emphasis on protecting the environment and reducing waste for future generations.	Comments noted. These are matters to be considered in any LDP revision.	No change to the RR.
18.1	Ministry of Defence	No specific comment to make	Noted.	No change to the RR.
19.1	National Grid	No comment to make	Noted.	No change to the RR.
20.6	Hallam Land Management (Asbri)	With regard to Section 4, the need to undertake urban capacity studies is of particular importance. Such studies should consider the capacity for growth of the main towns, with reference to the constraints which apply, and identify appropriate 'preferred directions' where future housing development should be accommodated. This could form a basis for the release of sites coming forward in advance of the replacement LDP and would inform the assessment of Candidate site submissions.	Comment noted. These are matters that will be considered in the preparation of the evidence base for any LDP revision.	No change to the RR.

Rep No	Representor	Comment	LPA Response	Recommendation
21.6	Hallam Land Management (Boyer)	<p>The Consultation Document refers to the WG Household and Population projections with the latest forecasts showing much lower levels of growth than the 2008 projection on which the LDP is based. The latest household projections are based on a short term trend of 5 years where households have formed a much lower level than anticipated therefore do not consider that the Council should place too much reliance on the 2011 and 2014 projections which reflect lower household formation rates during a period of recession. It is likely that the plan period will be extended to 2036 and it will be necessary to take into account a revised Local Housing Market Assessment, the Cardiff Capital Region City Deal, Future Monmouth and abolition of the Severn Bridge Tolls the LDP Housing Requirement will therefore need to take a wide range of factors into consideration and not rely solely on the latest household projections.</p>	<p>Comment noted. The appropriateness, or otherwise, of the more recent Welsh Government population and household projections, together with contextual issues such as City Deal and the abolition of the Severn Bridge charges, will be matters to be considered in any LDP revision.</p>	<p>No change to the RR.</p>

Rep No	Representor	Comment	LPA Response	Recommendation
22.6	Redrow Homes	The Review Report recognises that housing completions in Monmouthshire since 1981 have varied with a notably lower rate in the last 10 years. The significant factor being the recession and peoples' ability to get on the housing ladder, households increasing in size etc. It would be dangerous to set a lower housing requirement without considering the realistic impacts of the economic climate over this period and looking forward. Nearby authorities have seen a surge in completions in recent years because deliverable sites were allocated in their development plans. The employment requirements and job delivery needs to be carefully considered with housing requirements. A knock-on effect of not setting a realistic housing requirement would be further difficulty to deliver much needed affordable homes given the correlation with private housebuilders developing strategic allocations.	Comments noted. The future level of housing growth will be a matter for any LDP revision.	No change to the RR.
22.7		Agree that preparing a joint LDP with neighbouring authorities would not be efficient or appropriate. An SDP will provide the suitable regional consideration as the direct tier of plan direction above that of LDPs. The introduction of the SDP may allow further collaborative working in future LDPs but undertaking joint LDPs now is highly likely to delay getting appropriate plan-led controls in place to guide development locally.	Comments noted. The RR will be amended to further address the issue of joint working etc., although the respondent appears to support the Council's current position that a joint plan is not appropriate at the present time.	The RR to be amended to further address the issues of joint working etc.

Rep No	Representor	Comment	LPA Response	Recommendation
23.6	Richborough Estates (Turley)	Whilst we support a review of the housing requirement, it is important that the failure of the existing strategy to deliver sufficient housing growth is not seen as justifying a reduced future housing requirement. The appropriate housing requirement for the extended plan period should be based on a detailed and up to date evidence base. This evidence base should not rely solely on levels of projected household growth suggested by the latest 2014-based household projections as the projections for Monmouthshire are likely to significantly underestimate likely future household growth. Due consideration should be given to projections which account for longer term trends. It is also important that the housing requirement reflects wider economic drivers and aspirations (including the Cardiff Capital Region and City Deal).	The future level of housing growth will be a matter for any LDP revision. There is a need to consider whether the targets are appropriate in the light of, for example, the more recent Welsh Government population and household projections, the methodology for calculating a 5-year housing supply and past building rates.	No change to the RR.
23.6		The LDP Review is being progressed in the context of the failure of the existing plan to deliver sufficient levels of housing (both market and affordable). Given the timescales for completing the LDP Review, it is important that the Council maintains its pragmatic approach to determining residential applications , this approach will make an important contribution to housing supply in the interim period.	Comment noted.	No change to the RR.

Rep No	Representor	Comment	LPA Response	Recommendation
24.6	Mrs Carolyn Ovenden	<p>The proposal to extend the period of the Plan to 2036 is ridiculous. It is impossible to know the nation's circumstances in 18 years time. Specifically why give glamping so much consideration it will probably be out of date in 18 years time. Renewable energy policies need to be under constant review, not re-assessed only when an LDP is being drawn up. The current waste disposable plan is already out of date. Can future housing requirement really be assessed at present, the original LDP got it wrong and there is current potential for great change. The results of this review will not enhance the heritage and countryside of Monmouthshire by suggesting that house-building will take place on previously-designated green spaces and by taking amenity land. Has the Historic Environment Act 2016 been fully considered. Why delete the flood risk policy, it is vital to have one specifically for Monmouthshire's many endangered low-lying areas, which national policy appears to pay little attention to. Telecommunications do not function effectively throughout the county. Many public rights of way need evaluating. Who comprises the Officer Working Group and will any minor amendments they deem necessary be placed in the public domain.</p>	<p>It is recommended that a revised Plan period should cover a period of 15 years with a start date of 2018. This allows four years for Plan preparation and ensures the required ten year period from the date of Plan adoption. This would result in a Plan running from 2018 to 2033, which aligns with Torfaen's proposals and enables a consistent (and where appropriate, joint) evidence base with collaborative working. However, this end date may require amending to align with the SDP. The other issues raised are matters generally to be considered in any LDP revision. The suggested removal of Policy SD3 is in accordance with generally accepted practice that LDP policy should not repeat national planning policy and should be in consistent with it. Sufficient control over development in flood risk areas is provided by Technical Advice Note 15. The current LDP policy is not consistent with national policy - in some aspects it is more lenient and in others it is stricter. This inconsistency is not a satisfactory situation. Any proposed revisions to LDP policies will be subject to public consultation.</p>	<p>RR to be amended to clarify the proposed plan period.</p>
26.6		<p>The Welsh Government, MCC, Forest of Dean and Gloucestershire and the Health Board need to urgently get together to resolve the infrastructure problems of Chepstow which are only likely to get much worse once the Severn Bridge tolls go at the start of 2019 and there is a 20% increase in Chepstow traffic.</p>	<p>Comment noted. This would be a matter for any LDP revision. Liaison with neighbouring authorities will be necessary in any LDP revision process. The Welsh Government Highways Division is also consulted on matters relating to the A48 Trunk Road and associated development.</p>	<p>No change to the RR.</p>

Rep No	Representor	Comment	LPA Response	Recommendation
26.6		The policy side of the LDP needs to include a halt on development where it will impact air quality.	Comment noted. This would be a matter for any LDP revision.	No change to the RR.
26.6		The LDP should place a moratorium on building in Chepstow and surrounding area until the proper infrastructure is in place in terms of roads, primary schools and over stretched GP services.	Comment noted. This would be a matter for any LDP revision.	No change to the RR.
26.6		No account is taken in this LDP review of the need to consider the neighbouring authorities . Building in Gloucestershire is having a significant impact on the infrastructure in Chepstow and account needs to be taken of their building programmes, not only currently but in future as well. Any LDP is short sighted if it just considers the South Wales area. It is vitally important that Monmouthshire considers the surrounding English Counties in its LDP.	Comment noted. Liaison with neighbouring authorities will be necessary in any LDP revision process.	No change to the RR.
26.6		Employment land allocation needs to be further considered in relation to attracting new businesses across the whole of Monmouthshire.	Comment noted. This would be a matter for any LDP revision.	No change to the RR.
26.6	Cllr Louise Brown	Strongly disagree with any additions to sites in main villages and do not believe that there is any need for additional sites beyond those already in the LDP.	Comment noted. The location and scale of any new housing allocations would be a matter for any LDP revision.	No change to the RR.
26.6		There is insufficient infrastructure in Chepstow and surrounding areas to allow for any further development.	Comment noted. This would be a matter for any LDP revision.	No change to the RR.



Rep No	Representor	Comment	LPA Response	Recommendation
27.1	Gareth Smith	Strongly object to any amendments which would increase the number of general market and affordable housing on the Crick Road development site. It would be unjust to impose further obligations on the Crick Road development as a result of the Council's failure to ensure that other development sites fulfilled their quotas of general market and affordable homes. There appears to be no changes to existing infrastructure and no additional infrastructure to support the development as it stands let alone any further increase in housing numbers.	This is not a matter for the LDP review or any future LDP revision but a detailed matter that would be appropriately considered under any future planning application for the development of this allocated LDP site.	No change to the RR.
28.6	Llangybi Community Council	It is clear that the suitability of some housing sites need to be reassessed. For example, since Llangybi was assessed as a main village suitable for a development of 10 houses, it no longer has a shop/post office and the bus service has been significantly reduced. In addition, approval has been given for a separate development of 8 dwellings on a site in the village, putting additional pressure on the village infrastructure.	Comment noted. The suitability of any specific site for re-allocation or de-allocation will be a matter for any LDP revision.	No change to the RR.

Rep No	Representor	Comment	LPA Response	Recommendation
29.1	Monmouth 2020 Vision Group	Find the report well written, informative, balanced and objective in its review of the operation of the LDP. On the question of a full or short form revision, there are five reasons to suggest a full revision of the LDP. However, say it is essential to have effective community participation in any revision and are very concerned that the long timescale to take a fully revised LDP to adoption will make it extremely difficult for the community participation in the process to be effective. If the following changes can be addressed without fundamentally altering the overall direction of the Adopted Plan, then a short form revision over a much shorter timescale is preferable from a community point of view.	It is noted that the respondent does not express a specific preference between full or short form LDP revision, being influenced by opportunities for community participation. In this respect, a longer time period does allow more time for pre-deposit participation and enable 'front loading' in terms of community involvement in the LDP. After this stage, the regulations require more formal consultation processes that will, of necessity, be time restricted.	RR to be amended to make a recommendation on whether or not a LDP revision should take place and, if so, whether it should be a short form revision or a full revision.
29.		1. Population & Housing Growth & Land Supply - The Draft Review finding is that projected population growth and housing growth by 2021 is now estimated to be less than anticipated when the LDP evidence base was drawn up. Given the ending of the Severn Bridge charges in 2019 these projections need to be revised. It is difficult to understand whether the Draft Review is saying that as a consequence total land supply for housing will also need to be revised or not, either because of increased demand and/or because of the need to increase land supply to make up for the slowness of housing completions on the existing supply.	Comment noted. The fact that the current LDP is not meeting its housing targets is a justification for LDP revision. Any such revision, however, would take into account new population projections and contextual changes, such as the lowering of the Severn Bridge charges, as referred to by the respondent. There will be a need to consider whether the existing housing targets are appropriate and how they reflect emerging trends, economic growth and aspirations. This will be a matter for any LDP revision.	No change to the RR.

Rep No	Representor	Comment	LPA Response	Recommendation
29.1		2. Spatial distribution of housing growth and site selection - It is very important for communities to be involved in any changes in the selection of sites. In Monmouth the LDP spatial strategy appears to be on plan. There is a strong community wish to be involved in any revision of both the total housing growth in the town and the selection of sites. This must include an appraisal of the limits of growth of the town if it is to be a socially cohesive town of sustainable neighbourhoods around a network of active travel routes for school, work, leisure and shopping, rather than become a dormitory town based on high levels of commuting by car. The LDP revision must look at options for spatial distribution of whatever growth is required, including the option of providing for the development of a self-sustaining new settlement within the County.	Comments noted. These will be matters to be considered in any LDP revision.	No change to the RR.
29.1		3. Essential infrastructure - Whatever spatial distribution option is decided, a revised LDP must provide for any new housing growth to be matched by growth in the supply of employment, transport, education and health services and utility services.	Comments noted. These will be matters to be considered in any LDP revision.	No change to the RR.

Rep No	Representor	Comment	LPA Response	Recommendation
29.1		<p>4. Well-Being Objectives - There is a legal requirement for all public authority service providers to take reasonable steps to maximise their contribution to the local well-being objectives. Maximising the contribution of land use policies and programmes to the local WB objectives requires a revision of the LDP. This duty goes beyond just finding a coincidence of “purpose and objectives” between the LDP and the WB Plan (3.1 .13) and requires the LDP to demonstrate in practical terms exactly how it will maximise its contribution to delivering the local WB objectives and the 17 steps set out in the PSB Draft WB Plan. To take just two examples, where does the LDP make any reference to (a) changing housing spatial standards and play provision to ensure the local WB objective to “provide children and young people with the best possible start in life” and (b) planning for renewable energy in housing developments such solar panels or other technologies, to ensure the local WB objective to “protect and enhance the resilience of the natural environment whilst mitigating the impact of climate change”?</p>	<p>Comment noted. The need for the any revised LDP to contribute to delivering Local Well-being objectives is recognised.</p>	<p>No change to the RR.</p>

Rep No	Representor	Comment	LPA Response	Recommendation
29.1		<p>5. Place Plans - The Planning (Wales) Act 2015 introduced the option for planning authorities and community councils to produce Place Plans as supplementary detail within the strategic policies of the LDP. Beyond strategic housing sites and strategic policies for place-making, the current LDP does not deal with settlements in a holistic or detailed way. The Monmouth 2020Vision Group is looking at Monmouth as a whole economic, social and environmental place, setting out future options and the ways to deliver a chosen option, based on public participation. This will provide a base for the production of a Place Plan to be produced by the Town Council. It may be that as supplementary guidance to the LDP the production of a Place Plan requires only a short-form revision of the LDP?</p>	<p>Comment noted. Procedures for community participation in any LDP revision remain to be determined. To be adopted as Supplementary Planning Guidance (SPG) a Place Plan would need to support and expand on policies in an adopted development plan – ‘a means of setting out more detailed thematic or site specific guidance on the way in which the policies of an LDP are to be interpreted and applied in particular circumstances or areas.’ (PPW, ed. 9, para. 2.3.1 ). This suggests a sequential approach – an adopted LDP is followed by an adopted SPG. To be adopted as SPG a Place Plan would also need to focus on spatial matters. The relationship between any Place Plan and a revised LDP, therefore, is a matter that would require careful consideration. Whether or not the revision is a short form or full is not felt to have any implications for any such relationship, as the LDP will need to cover County wide matters, irrespective of any Place Plan production in particular communities.</p>	No change to the RR.
30.3	Monmouth Chamber of Commerce	<p>Have concerns about Natural Resources Wales document TAN15 seemingly stopping all commercial development in the flood plain. Will be lobbying NRW when TAN15 comes up for consultation later in the year and will support any changes, which make it more like the more flexible English document PPG25.</p>	<p>Comment noted. This is a matter for national policy.</p>	No change to the RR.

Rep No	Representor	Comment	LPA Response	Recommendation
32.6	Mr Rees Williams	The UDP/LDP process has been ongoing since 1999, with a Public Inquiry in 2004 and then followed by 10 years before the LDP was adopted in 2014. Further reforms are now proposed which according to the LDP Draft Review could take the programme up to 2036. Monmouthshire County Council set themselves exceptionally low targets which they consistently fail to achieve, and will continue to do so.	Comment noted. The level of housing growth required will be a matter to be considered in any LDP Revision.	No change to the RR.
33.6	Abergavenny Town Council	Would like to draw attention to the work of Team Abergavenny and the recent publication of North Monmouthshire Community Plan. This group together with the Town Council should be key stakeholders during the revision of the LDP.	Comment noted. Procedures for community participation in any LDP revision remain to be determined, although the importance of the Abergavenny Town Council and Team Abergavenny is recognised.	No change to the RR.
35.	Dwr Cymru Welsh Water	Capital investment in water and sewerage infrastructure is managed in 5 year Asset Management Plans (AMP). The current AMP, AMP 6, runs from April 2015 to March 2020 and AMP7 will run from April 2020 to March 2025. The AMP, along with delivering essential investment in infrastructure from an operational and maintenance perspective, seeks to ensure appropriate large scale investment is undertaken to provide capacity for new development and growth. Would encourage continued engagement as the Council progress the first review of the LDP in line with advice contained within the LDP Manual. This will enable information on the capabilities of the infrastructure to accommodate growth to help inform the revision of the LDP.	Comment noted. The respondent will be engaged throughout any LDP revision process. The importance of necessary water and sewerage infrastructure is recognised.	No change to the RR.

Rep No	Representor	Comment	LPA Response	Recommendation
37.6	Abergavenny & District Civic Society	Would have been helpful to explain that the 'review' is only an assessment of the performance of the present plan and that this will lead into plan 'revision'.	The scope for confusion over the terms 'review' and 'revision' is acknowledged. The RR does try to distinguish between the full review now being carried out - to be followed by a LDP revision if considered necessary.	RR to be amended to provide further clarification over 'review' and 'revision'.
38.1	Edenstone Homes	<p>Comment that:</p> <p style="text-align: right;">SAH11 (xv)</p> <p>Land adjacent to Trellech School – 15 units have already been successfully delivered in 2016/2017. The balance of the allocated site has the potential for 10-15 additional units and should be allocated in the plan review.</p> <p>SAH8 Tudor Road, Wyesham – The site is allocated for 35 units although pre-application discussions have shown that the capacity of the site is much greater. The site should be re-allocated in the plan review for circa 65 units.</p> <p>Major's Barn, Abergavenny – This site comprises land off Old Hereford Road and land off Hillside. The site should be allocated in the plan review for circa 250 units.</p>	The suitability, or otherwise, of any potential candidate site or of changes to existing site allocations will be matters to be considered in any LDP revision.	No change to the RR.
39.6	Home Builders Federation	4.2 The list should include a 'review of existing sites deliverability'. Appendix 1 Table 4 (and others) would benefit from a colour coded system to identify those built or being built, those with planning but not started and those without planning.	It will be necessary to consider the deliverability of existing and proposed sites. This will be done as part of the candidate site assessment process in any LDP revision.	RR Table 4 (Appendix 1) to be colour coded for ease of reference.

Rep No	Representor	Comment	LPA Response	Recommendation
42.4	Stephen Arnell	Consider that the LDP is no longer fit for purpose. It still wrongly interprets 'sustainability' by distributing residential development predominantly around towns because of their transport links and services, and to reduce reliance on the private motor car. This is out of date, it takes no account of current and future changes in technology, e.g. polluting cars being replaced by electric/hybrid/hydrogen fuel cell cars, banning new petrol and diesel cars by 2040, increasing electricity generation from renewables, the internet and its effect on the way we work and shop. These advances allow a more even distribution of residential development between towns and villages meaning more choice, which will be necessary to help attract inward investment when the Severn Bridge Tolls are abolished at the end of 2018 and help sustain the local village schools etc. The LDP Review must take account of the effects of these and any other changes that can be reasonably foreseen on its vision and policies.	Comments noted. These are matters to be considered in any LDP revision.	No change to the RR.
43.1	The Coal Authority	Monmouthshire County Council area contains coal resources which are capable of extraction by surface mining operations. These resources cover an area amounting to approximately 1.25% of the Council area. The Coal Authority is keen to ensure that coal resources are not unnecessarily sterilised by new development. Where this may be the case, The Coal Authority would be seeking prior extraction of the coal. Prior extraction of coal also has the benefit of removing any potential land instability problems in the process.	Comments noted. It is assumed that the respondent is referring to the Monmouthshire County Council administrative area rather than the local planning authority area. This matter will be clarified with the respondent.	No change to the RR.



Rep No	Representor	Comment	LPA Response	Recommendation
43.1		<p>Note that this is an early stage in the review process and have no specific comments to make on the contents of the report. The Coal Authority provides downloadable data to the LPA in respect of Surface Coal Resource and Development Risk plans, this data is updated annually, would expect the LPA to assess any future allocations against this data in order to identify any areas of risk, resource or constraint, early in the process</p>	Comments noted.	No change to the RR.
43.1		<p>Monmouthshire County Council area has been subjected to coal mining which will have left a legacy. Whilst most past mining is generally benign in nature, potential public safety and stability problems can be triggered and uncovered by development activities. Within the Monmouthshire County Council area there are approximately 181 recorded mine entries and around 23 coal mining related hazards have been reported to The Coal Authority. Mine entries and mining legacy matters should be considered by Planning Authorities to ensure that site allocations and other policies and programmes will not lead to future public safety hazards. Although mining legacy occurs as a result of mineral workings, it is important that new development recognises the problems and how they can be positively addressed. However, it is important to note that land instability and mining legacy is not a complete constraint on new development; rather it can be argued that because mining legacy matters have been addressed the new development is safe, stable and sustainable</p>	<p>Comments noted. It is assumed that the respondent is referring to the Monmouthshire County Council administrative area rather than the local planning authority area. This matter will be clarified with the respondent.</p>	No change to the RR.

Rep No	Representor	Comment	LPA Response	Recommendation
44.1	Theatres Trust	<p>Strongly recommend that the new LDP explicitly supports arts and culture at all levels to benefit the local economy and ensure that all residents and visitors, and future generations, have access to cultural opportunities. Recommend the inclusion of policies which protect, support and enhance cultural facilities and activities, particularly those which might otherwise be traded in for more commercially lucrative developments. Culture is included as a well-being goal within the Well-being of Future Generations Act 2015 and thus should be reflected within Monmouthshire's Local Well-being Plan. In turn, paragraph 2.1.7 of Planning Policy Wales Edition 9 (November 2016) states this should provide the overarching strategic framework for other plans and strategies including the LDP. Culture and community facilities helps develop a sense of place and makes communities unique and special. It contributes to the vibrancy of town centres, the tourist and night time economy and supports the day to day needs of local communities and helps promote well-being and improve quality of life. There is a growing awareness of the role that the arts and culture play in attracting and retaining residents and a skilled workforce.</p>	<p>Comments noted. These are matters to be considered in any LDP revision.</p>	<p>No change to the RR.</p>

Rep No	Representor	Comment	LPA Response	Recommendation
45.6	Bovis Homes Group (Lichfields)	Consider that it is important that the review of existing housing site allocations is undertaken with regard to the specific reasons as to why each individual allocation has not come forward. The proposed housing allocation known as Land at Vinegar Hill, Undy (allocation reference SAH6) has been delayed due to the Welsh Government's (WG) proposal to create a M4 relief road around Newport. Reaching agreement with the WG has resulted in delays with progressing a planning application at the site. However agreement now ensures that the housing allocation can be delivered in the short term (next 5 years) and make a meaningful contribution towards meeting the Council's housing need.	The RR acknowledges that there is a need to re-assess undelivered housing allocations and the respondent's site specific comments are noted. This will be a matter for any LDP revision.	No change to the RR.

Rep No	Representor	Comment	LPA Response	Recommendation
46.6	Llanover & Coldbrook Estate (LRM Planning)	The existing approach to development at settlements has been overly restrictive and it is likely that it will need to be refined with growth being encouraged in a wider range of settlements in order provide an appropriate and deliverable supply of land for housing. The list of settlements where growth is to be encouraged is likely to need to increase to ensure a robust supply pool, there may have been changes to settlements that would have improved their level of sustainability and it is important that housing is facilitated at such locations in order to sustain the long term economic viability of these villages. It is fundamentally important to define an adequate and continuous supply of available and suitable land to meet the needs of the Plan area: 1. immediate deliverable sites of 15 to 150 dwellings (approximately), that would be achievable within the 5 year period and help to remedy any short term deficiencies; and 2. larger longer term allocations extensions – that would deliver in the new plan period (2021 to 2036). It will also be important to ensure that opportunities for other uses such as employment are identified in order to help improve the sustainability of settlements.	Comment noted. The RR recognises that there is a need to increase the supply of housing land. The suitability, or otherwise, of any potential candidate site or of any village to accommodate development will be matters to be considered in any LDP revision.	No change to the RR.

Rep No	Representor	Comment	LPA Response	Recommendation
47.6	Taylor Wimpey (Turley)	The submission is accompanied by a Housing Provision Technical Document, although it is recognised that the Council is at a very early stage in developing evidence on the scale of housing need in Monmouthshire, and its translation into a level of housing growth to be accommodated through the LDP Review and it is appreciated that as part of this consultation, the Council has not updated any of the key parts of its evidence base. It is strongly agreed that the Council will need to prepare a detailed needs assessment to inform the LDP Review.	Noted. The level of housing growth required will be a matter to be considered in any LDP Revision	No change to the RR.
48.6	Llanarth Estates (WPM Planning)	The current LDP and Draft Report does not give sufficient consideration to the rural communities within Monmouthshire. The respondent owns significant amounts of land around Llanarth that are considered suitable for development.	Comment noted. The RR recognises that the spatial strategy may need revising. This could include a reconsideration of the approach to rural areas. The suitability, or otherwise, of any potential candidate site or of any village to accommodate development will be matters to be considered in any LDP revision.	No change to the RR.

Rep No	Representor	Comment	LPA Response	Recommendation
49.1	Cadw	In general the review shows that good progress is being made but several key policy indicator targets and monitoring outcomes relating to housing provision are not currently being achieved. In regard to the Historic Environment there are currently 4 LDP policies and the review indicates that all are functioning effectively, although it is considered that minor amendments may be made to two of them. However the LDP was adopted before the Historic Environment Act was enacted in 2016 and the resultant changes to Planning Policy Wales were made. There is therefore a need for the Historic Environment Policies to be reviewed and a consideration of the need for new or amended policies to be devised in particular in regard to Building of Local Interest and Historic Landscapes.	Comments noted. The RR identifies the change in context arising from the Historic Environment (Wales) Act 2016. Any required policy changes would be a matter for any LDP revision.	Appendix 1, Table 2 Review of Development Management Policies to be amended to clarify that consideration will be given to the need to revise heritage policies in light of the Historic Environment Act.
50.9	Mrs Evelyn Birden (Newland Rennie)	In relation to affordable housing section 3.3 .5 states allocation policies require amendment and 3.3 .9 refers to lack of relevance in current policy to minor villages. Reference is made to land previously put forward in Tredunnoch that is considered suitable for development.	The suitability, or otherwise, of any potential candidate site will be a matter to be considered in any LDP revision.	No change to the RR.
51.6	Dr David Rosser (Newland Rennie)	Reference is made to land in Usk that the respondent considers suitable for development.	The suitability, or otherwise, of any potential candidate site will be a matter to be considered in any LDP revision.	No change to the RR.
52.6	Morris' of Usk (WPM Planning)	Reference is made to land in Llangybi that the respondent considers suitable for development.	The suitability, or otherwise, of any potential candidate site will be a matter to be considered in any LDP revision.	No change to the RR.

Rep No	Representor	Comment	LPA Response	Recommendation
53.6	Barton Willmore	Support the Council's pragmatic approach to the determination of residential development sites where they are a departure from the LDP but are otherwise acceptable in planning terms . Note that the Council make reference to the 'past build rates' to calculate housing land supply within the Draft Review Report. TAN 1 is clear that LPAs should base the five year housing land calculations on the 'residual method', and would accordingly advise caution in using 'past build rates' to illustrate the Authority's supply position as this can be misleading to those reading the Report.	It considered reasonable to indicate that there is a need to consider whether the targets are appropriate in the light of, for example, the more recent Welsh Government population and household projections, the methodology for calculating a 5-year housing supply and past building rates. These are factors that suggest that the LDP needs revising, along with the fact that the current LDP is not meeting its targets or achieving a 5-year housing supply, which may necessitate additional site allocations. The future level of housing growth will be a matter for any LDP revision.	No change to the RR.
54.1	Cllr Val Smith	Do not consider proposals to develop land at Chepstow Road Raglan appropriate as construction of roads houses and domestic paraphernalia will impede natural drainage . Need to maximise capital receipts should not drive inappropriate planning proposals. Development would generate additional traffic congestion but also bring commercial enterprises and funds for community initiatives. Development of an alternative site would be more appropriate.	Comment noted. This is not a matter for the LDP revision as the site is an existing allocation in the adopted LDP and is likely to be subject of a planning application in the near future, the pre-application consultation already having taken place. These are detailed matters that would be appropriately considered under any future planning application for the development of this allocated LDP site. G302	No change to the RR.
54.2	Cllr Val Smith	Development of the Caerwent military base would be in line with Future Generations aspirations and be an opportunity to lead the way with innovative design, a different approach to peppering development across Monmouthshire.	Comment noted. The suitability, or otherwise, of any potential candidate site will be a matter to be considered in any LDP revision.	No change to the RR.

Rep No	Representor	Comment	LPA Response	Recommendation
58.1	Llanover Community Council (Late Rep)	Ask that the Council reconsider the proposal that land forming part of Glanusk Farm, Llanfair Kilgeddin be approved as potential development land. Understand that the Inspector only agreed to it being included on the basis that the village had a Primary School. That is no longer the case. Indeed, it is anticipated that the owner of the land on which the former school is located will shortly apply for planning permission for a small development within the former school grounds. Being Infill that development will be more acceptable than the one approved in the LDP and there is no requirement for two new housing developments in the village.	The RR acknowledges that during any LDP revision process there will be a need to re-assess undelivered housing allocations that have not obtained planning permission .	No change to the RR.
59.1	R Illsley (Late Rep)	Concerned that there is a possibility of extra homes on the Crick Road site. Existing infrastructure will be swamped by new build on Crick Road and Sudbrook without additional housing.	This is not a matter for the LDP review or any future LDP revision but a detailed matter that would be appropriately considered under any future planning application for the development of this allocated LDP site.	No change to the RR.
60.5	St Arvans Community Council (Late Rep)	It is difficult to see what any Review would achieve unless and until the current LDP has run nearer its course and financial restrictions ease.	Comment noted.	No change to the RR.



**Lesley Griffiths AC/AM**  
Ysgrifennydd y Cabinet dros Ynni, Cynllunio a Materion Gwledig  
Cabinet Secretary for Energy, Planning and Rural Affairs



Llywodraeth Cymru  
Welsh Government

Ein cyf : Our ref : QA1282787

Leader and Chief Executive of the Council

13 December 2017

Dear Colleague,

**Invitation to Local Planning Authorities to prepare a Strategic Development Plan (SDP)**

The Planning (Wales) Act 2015 included the legislation necessary to produce Strategic Development Plans (SDPs). SDPs allow larger than local issues such as housing, employment and infrastructure which cut across a number of Local Planning Authorities (LPAs) boundaries to be considered in an integrated and comprehensive way.

The role of the planning system in delivering excellent outcomes for Wales at national, regional and local levels has never been more prominent. Our new National Strategy: Prosperity for All acknowledges the key role the planning system must play by recognising planning decisions as a critical lever to deliver the central goal of prosperity for all. It notes planning decisions affect every area of a person's life. They determine where homes are built, where services are provided, the quality of the local environment, the promotion of sustainable economic growth and access to open space. The right planning system is critical in delivering the objectives of the strategy – this includes ensuring better LDPs and SDPs are produced in the future.

SDPs have the potential to reduce complexity and repetition currently contained in LDPs and make more effective use of resources. The ability to pool resources, reduce preparation costs, undertake more joint technical work, utilise existing skills and expertise and rationalise issues crossing administrative boundaries should not be lost. SDPs are also necessary to provide a robust framework for the delivery of the land use implications of existing and emerging City Deal and Growth Deal proposals.

My vision for the development plan system is to achieve the most expedient way of maintaining LDP coverage through the production of Joint LDPs, while encouraging and facilitating a strategic approach through SDPs to deal with issues of regional importance. This is not about setting up parallel or competing plans, rather a streamlined suite of plans that complement and integrate as one.

To date, no proposals have been forthcoming. I consider preparing SDPs on a consistent basis for each of the three regions of South East, Mid and West and North Wales will ensure the most efficient use of resources, maintain an effective decision making framework and deliver high quality planning outcomes. **I am therefore inviting proposals for SDPs, based on the 3 regional footprints, to come forward.**

Yours sincerely,



**Lesley Griffiths AC/AM**

Ysgrifennydd y Cabinet dros Ynni, Cynllunio a Materion Gwledig  
Cabinet Secretary for Energy, Planning and Rural Affairs



Ein cyf : Our ref: QA1282787

Arweinydd a Phrif Weithredwr y Cyngor

B Rhagfyr 2017

Annwyl Gyfaill,

### Gwahoddiad i Awdurdodau Cynllunio Lleol baratoi Cynllun Datblygu Strategol

Roedd Deddf Cynllunio (Cymru) 2015 yn cynnwys y ddeddfwriaeth angenrheidiol i greu Cynlluniau Datblygu Strategol. Mae'r Cynlluniau yn caniatáu i faterion mwy na materion lleol megis tai, cyflogaeth a seilwaith sy'n cynnwys nifer o ffiniau Awdurdodau Cynllunio Lleol i gael eu hystyried mewn dull integredig a chynhwysfawr.

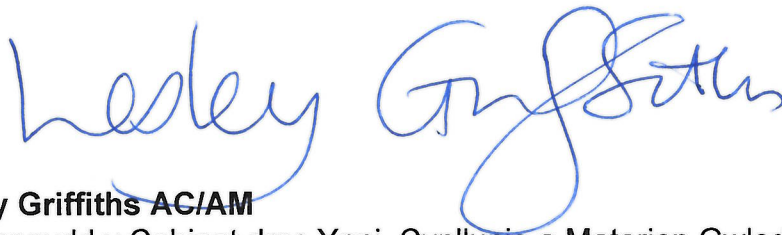
Nid yw swyddogaeth y system gynllunio wrth ddarparu canlyniadau rhagorol i Gymru ar lefelau cenedlaethol, rhanbarthol a lleol erioed wedi bod mor amlwg. Ein Strategaeth Genedlaethol newydd: Mae Ffyniant i Bawb yn cydnabod y swyddogaeth allweddol sydd gan y system gynllunio i gydnabod penderfyniadau cynllunio fel dull hollbwysig o ddarparu'r nod canolog o ffyniant i bawb. Mae'n nodi bod penderfyniadau cynllunio yn cael effaith ar bob agwedd ar fywyd person. Maent yn penderfynu ble y caiff tai ei hadeiladu, ble y darperir gwasanaethau, ansawdd yr amgylchedd lleol, hyrwyddo twf economaidd cynaliadwy a mynediad i fannau agored. Mae'r system gynllunio iawn yn hollbwysig wrth ddarparu amcanion y strategaeth - mae hyn yn cynnwys sicrhau bod Cynlluniau Datblygu Lleol a Chynlluniau Datblygu Strategol yn cael eu datblygu ar gyfer y dyfodol.

Mae gan Gynlluniau Datblygu Strategol y posibilrwydd o leihau y cymhlethdod a'r ail-adrodd sydd o fewn Cynlluniau Datblygu Lleol i wneud defnydd mwy effeithiol o adnoddau. Ni ddylid colli'r gallu i gronni adnoddau, lleihau costau paratoi, cynnal mwy o waith technegol ar y cyd, defnyddio sgiliau ac arbenigedd presennol a rhesymoli materion sy'n mynd ar draws ffiniau gweinyddol. Mae Cynlluniau Datblygu Strategol yn angenrheidiol hefyd er mwyn cynnig fframwaith cadarn ar gyfer darparu goblygiadau defnydd tir cynigion presennol a newydd Bargeinion Dinesig a'r Bargeinion Twf.

Fy ngweledigaeth ar gyfer y system cynllunio datblygiadau yw sicrhau'r dull mwyaf hwylus o gynnal Cynlluniau Datblygu Lleol drwy gynhyrchu Cynlluniau Datblygu ar y Cyd, tra'n annog a hwyluso dulliau strategol drwy'r Cynlluniau Datblygu Strategol i ddelio gyda materion sydd o bwys rhanbarthol. Nid yw hyn yn golygu sefydlu cynlluniau ar y cyd neu gynlluniau sy'n cystadlu, yn hytrach, cyfres syml o gynlluniau sy'n ategu ac yn integreiddio fel un.

Mae pedwar prosiect wedi'u cymeradwyo hyd yma. Rwy'n teimlo y bydd paratoi Cynlluniau Datblygu Strategol yn gyson ar gyfer pob un o'r tri rhanbarth, y De-ddwyrain, y Canolbarth a' Gogledd a'r Gorllewin a Gogledd Cymru yn sicrhau y defnydd mwyaf effeithiol o adnoddau, gan gynnal fframwaith effeithiol ar gyfer gwneud penderfyniadau a sicrhau canlyniadau cynllunio o safon uchel. **Rwyf felly'n gwahodd cynigion ar gyfer Cynlluniau Datblygu Lleol, yn seiliedig ar y 3 model rhanbarthol.**

Yn gywir,



**Lesley Griffiths AC/AM**

Ysgrifennydd y Cabinet dros Ynni, Cynllunio a Materion Gwledig  
Cabinet Secretary for Energy, Planning and Rural Affairs



Ein cyf : Our ref : QA1282787

Cllr Peter Fox and Mr Paul Matthews  
Leader and Chief Executive of  
Monmouth County Council  
P O Box 106  
Caldicot  
NP26 9AN

Dear Peter and Paul

13 December 2017

**Invitation to prepare a Joint Local Development Plan (LDP) South East Wales - East**

It is almost 14 years since the Planning and Compulsory Purchase Act (2004) introduced the requirement for Local Planning Authorities to prepare, monitor and keep review Local Development Plans. Progress has been made with 20 adopted LDPs in place.

The latest round of LDP Annual Monitoring Reports, submitted in October, has demonstrated mixed success for plans adopted between 2010 and 2015. This is particularly evident for critical planning outcomes, including supporting the delivery of housing in sustainable locations. With this in mind, it is right to pause and reflect on the correct path to take to maintain effective LDP coverage ahead of adoption of a Strategic Development Plan (SDP) for the region. It is also necessary to provide a robust framework for the delivery of the land use implications of the Cardiff Capital Region City Deal proposals.

The role of the planning system in delivering excellent outcomes for Wales at national, regional and local levels has never been more prominent. Our newly adopted National Strategy: Prosperity for All acknowledges the key role the planning system must play by recognising planning decisions as a critical lever to deliver the central goal of prosperity for all. It notes planning decisions affect every area of a person's life. They determine where homes are built, where services are provided, the quality of the local environment, the promotion of sustainable economic growth and access to open space. The right planning system is critical in delivering the objectives of the strategy – this includes ensuring better LDPs are produced in the future.

Our vision for LDPs is not just to have full plan coverage, but achieve this in the most effective and efficient way, whilst also making a real difference for people and places. This does not mean replicating the procedures of the past, such as preparing plans on an individual basis. Often this has led to lengthy timescales for preparing plans, numerous delays in the process, a lack of effective consideration for issues transcending administrative boundaries and a difficulty in demonstrating the benefits of the system. The average time taken to prepare a first generation LDP was almost 6½ years which is totally unacceptable and cannot be replicated in the future. Evidence for the Planning (Wales) Bill demonstrated the cost of preparing a LDP to be between £1.4 and £2.2 million. Since then local government expenditure on planning services declined by 53% between 2009/10 and 2016/17 as a result of the UK Government austerity programme imposed on Wales with many of these reductions borne by your LDP teams. I do not believe many authorities currently have the capacity, capability or resilience necessary to progress LDPs on an individual authority basis.

For the reasons identified above we must approach the future with a new outlook, embracing the benefits from undertaking Joint LDPs. Maximising efficiency savings, both staffing and financial; delivering better outcomes on a more consistent basis; reaping the financial benefits through economies of scale and avoiding the pitfalls of duplication and repetition are all there to be seized. For the South East Wales - East area there are significant opportunities and challenges which are best addressed through the preparation of Joint Local Development Plans. These include maximising the take up of brownfield land to strengthen communities, minimising green field site releases. Realising the benefits provided by new infrastructure, such as the Metro, taking advantage of increased connectivity, accessibility and resilience of public transport corridors by identifying and implementing an area wide sustainable settlement strategy will be important considerations.

Ensuring the removal of the Severn Bridge tolls is harnessed to regenerate communities, avoiding the negative impacts on air quality through additional car based travel.

This approach aligns with emerging Local Government Reform proposals and stated intention of local government to work more collaboratively in the future. For the compelling reasons set out in this letter. I invite you to give serious consideration to improving the effectiveness of the planning system by preparing a Joint Local Development Plan. I am seeking positive responses to this invitation by the **28 February 2018**. Until such time I will not agree any plan progressing individually.

Yours sincerely,



**Lesley Griffiths AC/AM**

Ysgrifennydd y Cabinet dros yr Amgylchedd a Materion Gwledig  
Cabinet Secretary for Energy, Planning and Rural Affairs

Leader and Chief Executive Blaenau Gwent County Borough Council  
Leader and Chief Executive Newport City Council  
Leader and Chief Executive Torfaen County Borough Council

Date/Dyddiad: 6 February 2018  
Ask for/Gofynnwch am: Leader  
Telephone/Rhif ffôn: 01446 709469  
Fax/Ffacs:  
Your Ref/Eich Cyf:  
My Ref/Cyf: JWT/JCC/S18/8327  
e-mail/e-bost:

The Vale of Glamorgan Council  
Civic Offices, Holton Road, Barry, CF63 4RU  
Tel/Ffôn: (01446) 700111  
Textphone/Ffôn Testun: (01446) 741219  
Cyngor Bro Morgannwg  
Swyddfeydd Dinesig, Heol Holton, Y Barri CF63 4RU  
www.valeofglamorgan.gov.uk



Lesley Griffiths AM,  
Cabinet Secretary for Energy, Planning and Rural Affairs  
Welsh Government  
Cardiff Bay  
Cardiff  
CF99 1NA

Dear Cabinet Secretary,

**INVITATION TO PREPARE JOINT LOCAL DEVELOPMENT PLANS AND STRATEGIC DEVELOPMENT PLANS**

We refer to your letter of 13 December 2017 regarding the above matter and your invitation for proposals to be brought forward to prepare Strategic Development Plans.

We can advise that your letter was discussed at length at a recent Cardiff Capital Region Cabinet Briefing and we are corresponding to you to reflect the discussion that was held at that briefing. We are also seeking an urgent meeting to discuss this important issue with you at the earliest opportunity.

Firstly, we must advise that your letter came without warning and was somewhat counterproductive in the current context within which we are operating in South East Wales. Various officers from the region have been in discussion with your officials in the hope of obtaining an agreement as to the most appropriate way of working towards preparing a Strategic Development Plan (SDP) in the context of the current suite of Local Development Plans (LDP's) and your work in producing a National Development Framework (NDF). I am aware that our officers have offered to assist your officials in preparing the South East Wales chapter of the National Development Framework. Meanwhile, significant work has been undertaken by officers at each Local Planning Authority to consider the best way forward to achieve meaningful and successful plan coverage in their area and across the region to support the delivery of the City Deal and provide the wider land use planning framework for the region.

We welcome your recognition that now is a time to pause and reflect on the correct path to take to maintain effective development plan coverage ahead of adoption of a SDP.

We are pleased to advise you that at the recent briefing there was consensus amongst all 10 Leaders in the Cardiff Capital Region in support of the principle of a SDP for the region. Whilst the decision to work towards a SDP is a matter for each of the 10 Councils, we are confident that this is a decision which can be taken quickly. It is also relevant that the South East Wales Strategic Planning Group (SEWSPG) has already made significant progress on joint working, and prepared agreed methodologies for LDP / SDP evidence base. This demonstrates a real commitment from those officers at the 'coal face' to work together to share best practice and expertise and avoid duplication or inconsistencies between us. This is the start of coming together to prepare the SDP for the region and something we are keen to build on.

Notwithstanding the consensus that exists to prepare a SDP, there are also significant concerns that remain, which we set out in the remainder of this letter.

There is a consensus amongst all 10 Local Authorities in the Cardiff Capital Region that it would be a mistake to undertake joint LDPs on the footprints proposed in your letter at this stage. The arguments against such an approach are set out below.

Firstly, it would take considerable time and effort to establish the joint working at the sub-regional level necessary to facilitate joint LDPs (i.e. setting up joint LDP teams, governance arrangements, Joint Planning Boards etc.) and this would delay plan preparation for those LPAs who wish to proceed with reviewing their existing LDPs in the short term. Furthermore, it would be a significant distraction from the agreed goal of establishing joint regional working arrangements and governance to facilitate preparation of the SDP. The two processes may work against each other and at the very least would be a duplication of effort. On the other hand, the preparation of Joint LDPs which rely on each LA approving them via full Council presents significant risk to those involved (as was the case with the only joint LDP prepared to date for Gwynedd / Anglesey).

Secondly, it is clear from discussions that our chief planning officers have had with your officials that there was no evidence or analysis undertaken to identify the sub-regional groupings proposed in terms of planning outcomes or the benefits of alternative approaches such as preparing individual plans 'jointly' with the development of shared evidence bases and methodologies. It is clear that your groupings are simply geographical clusters with a single commonality; that being their Local Development Plan expiry / review dates. Notably, 3 Local Authorities in the region have been excluded (even from the invitation) apparently because of their longer plan expiry dates (Cardiff and Vale) or because they have already made some progress on their LDP review (Merthyr Tydfil). We would strongly contend that this does not provide a strong foundation for regional working and is extremely unlikely to provide the best



planning outcomes for the region. In contrast, joint working across the whole region would allow for more successful outcomes where there are shared land-use planning issues. These issues are best understood and provided for through the preparation of the SDP which can address issues across the region, with light touch LDPs addressing more 'local' issues.

Thirdly, there appears limited understanding of the resource implications of progressing the SDP alongside the preparation of LDPs/ joint LDPs, with assumptions having been made about those Local Authorities not progressing an LDP review or joint LDP having sufficient resources to progress the SDP on behalf of the rest. These decisions about resources should be made by those Local Authorities involved and not imposed by Welsh Government.

It is understood from your officials that the Welsh Government's goals are twofold: 1) early progress on the SDP, and 2) full plan coverage. We believe the best way to meet these goals is to enable us to proceed with the SDP immediately, whilst necessary measures are taken by Welsh Government to enable the existing plans to provide the necessary LDP coverage in the region post 2021. We consider that those Councils that consider it necessary to proceed to review / replace their LDPs, should be allowed to do so individually or jointly as they see fit in order to best respond to local issues. Those Councils who do not face similar pressures, should be allowed time to progress work on the SDP and light touch LDPs. In this regard, it would be both helpful and pragmatic if you would agree to remove the plan expiry rule where there is clear evidence that plan coverage preparation is being made (in the way set out above).

In conclusion, we welcome your statement that the right planning system is critical in delivering the objectives of the National Strategy: Prosperity for All and that this includes ensuring better LDPs and SDPs are produced in the future. However, we do not believe short-term joint LDPs are the answer and we feel we are extremely well placed to deliver the right planning system through a meaningful and timely SDP accompanied by a suite of appropriate LDPs (prepared individually or jointly based on planning outcomes and the needs and desires of our communities). We therefore ask your support to enable us to deliver this.

Finally, we would also like to take this opportunity to reiterate the concerns expressed by Local Planning Authorities across Wales about the acknowledged weaknesses in the housing land availability monitoring process as defined in TAN1. Within the first generation Local Development Plans, most Local Planning Authorities in SE Wales reflected the high household projection figures that were produced by Welsh Government in 2003, 2006 and 2008. As such these plans have relatively high growth figures embedded within them. However since 2008 the completion rates in SE Wales have fallen as a consequence of the economic downturn. Ongoing pressure to ensure a 5-year land supply will undoubtedly encourage LPAs to set lower housing targets in the next generation of LDPs, in order to ensure that the 5-year land supply can be maintained over the plan period. This will result in less land being identified for housing in LDPs and less land being genuinely available for housing, which

runs contrary to the City Region's aspirations for growth and our shared desire to build more homes (including affordable homes) in SE Wales. We will monitor with keen interest how the recommendations contained in the Arcadis Report are reflected in the review of Planning Policy Wales and the forthcoming revisions of the Development Plan Manual.

We look forward to meeting with you urgently, so that we can discuss this important issue in the context of the City Deal for the Cardiff Capital Region. We would also ask for your considered response to the matters raised above and hope that we can move forward in a positive manner with your support.

Yours sincerely,



John Thomas.

Councillor John Thomas, Leader, Vale of Glamorgan Council



A. Morgan

Councillor Andrew Morgan, Leader, Rhondda Cynon Taf County Borough Council



D. V. Poole

Councillor David Poole, Leader, Caerphilly County Borough Council



Our Ref/Ein Cyf: PAF/MH/LG  
Your Ref/Eich cyf:  
E-mail/E-bost: [peterfox@monmouthshire.gov.uk](mailto:peterfox@monmouthshire.gov.uk)

Tel./Ffon: 01633 644020  
Date/Dyddiad: 28<sup>th</sup> February 2018

Lesley Griffiths AM  
Cabinet Secretary for Energy, Planning and Rural Affairs  
Welsh Government  
Cardiff Bay  
CF99 1NA

Email: [correspondence.lesley.griffiths@gov.wales](mailto:correspondence.lesley.griffiths@gov.wales)

Dear Cabinet Secretary

**RE: INVITATIONS TO PREPARE A STRATEGIC DEVELOPMENT PLAN AND A JOINT LOCAL DEVELOPMENT PLAN (LDP) FOR ‘SOUTH EAST WALES - EAST’**

I refer to your letters dated 13<sup>th</sup> December 2017 regarding your invitation to prepare a Strategic Development Plan (SDP) for the SE Wales region, and your invitation to produce a Joint Local Development Plan with Newport, Torfaen and Blaenau Gwent Councils.

I welcome and agree with your recognition that the planning system has a key role to play in delivering positive outcomes, prosperity for all, and making a real difference for people and places. A plan-led development system is an important tool in ensuring sustainable development but it also provides essential certainty to developers and investors, as well as to our communities. I fully recognise the benefits of a proper regional approach to cross-boundary issues and, as you will be aware, significant progress towards joint working has been made over the last three years culminating in the City Deal bid and creation of a Joint Cabinet.

I fully support the production of a Cardiff Capital Region SDP, as set out in the letter from the Leader of the Vale of Glamorgan, Councillor John Thomas and Councillors Andrew Morgan and David Poole, dated 6<sup>th</sup> February 2018, which states:

*“there was consensus amongst all 10 Leaders in the Cardiff Capital Region in support of the principle of an SDP for the region. Whilst the decision to work towards an SDP is a matter for each of the 10 Councils, we are confident that this is a decision which can be taken quickly.”*

County Councillor Peter Fox OBE, Leader/Arweinydd  
Monmouthshire County Council, County Hall, Usk, Monmouthshire NP15 1GA  
Cyngor Sir Fynwy, Neuadd Sir, Brynbuga, Cyngor Sir Fynwy NP15 1GA  
Tel/Ffon 01633 644020  
Website: [www.monmouthshire.gov.uk](http://www.monmouthshire.gov.uk)

Within the next month, my Cabinet Member for Enterprise will be seeking a Council resolution to be part of the Cardiff Capital Region SDP. At the same time, we will be seeking a Council resolution to commence on a full revision of a Monmouthshire LDP, having completed a full review of our LDP, consulted on the draft Review Report, and carried out an options appraisal with regard to your letters.

The combined CCR Leaders' letter highlights the key concerns relating to preparing Joint LDPs on the large footprints you have proposed. These concerns include the delays in setting up and running the joint working arrangements as well as the distraction from delivering the SDP, which is the proper way of delivering strategic regional spatial planning. The delays and uncertainty surrounding Joint LDPs is evidenced by the Gwynedd and Ynys Môn Joint LDP, which took over 6 years to deliver and was very nearly not adopted by one Council, which would have left both Councils without a development plan.

The new provisions in the Planning (Wales) Act 2015 create an 'expiry date' for LDPs, beyond which they are no longer the development plan for the area. Consequently, the adopted Monmouthshire LDP legally "*ceases to be a local development plan*" on 31<sup>st</sup> December 2021. After this date, the Council will be at risk from development proposals without a statutory development plan framework to properly manage them, until such time as a replacement development plan is adopted. This calls into question our ability to ensure sustainable development and to secure S106 planning contributions towards essential infrastructure and affordable housing, without those policy hooks or supplementary planning guidance in place. Objections to this change during consultation on the Bill were not heeded, and as a result of this legislative provision you will understand why we cannot afford to risk the delays involved in establishing the governance, structure, team culture and accountability arrangements for a Joint LDP.

Given the agreement to proceed with an SDP, the proposed Joint LDPs provide an unnecessary sub-regional tier, achieving neither a proper City Region strategic approach nor a truly local plan that our communities value, engage with and take ownership of. Contrary to assertions made by your officers, there is a distinct lack of outcome-focussed evidence to support your proposed Joint LDP groupings. The rationale for the groupings appears to be entirely process-driven based on LDP expiry dates.

The proposed 'South East Wales – East' Joint LDP would result in a Plan covering some 400,000 people across an area exceeding 100,000 hectares. The proposed footprint comprises a very diverse area with vastly different demography, economies and physical characteristics ranging from Wales' youngest City, to historic market towns and significant rurality, to disadvantaged valleys communities. Population density<sup>1</sup> ranges from 7.85 people per square kilometre in Newport to 1.05 in Monmouthshire. The proportion of land area defined as 'built on' ranges from 25% in Newport to 3% in Monmouthshire<sup>2</sup>. Blaenau Gwent has the highest proportion (23.4%) of LSOAs ranked in the lowest 10% in Wales while Monmouthshire has the lowest proportion (0%)<sup>3</sup>. The proposed grouping does not withstand evidence-based scrutiny.

---

<sup>1</sup> 2016 population data

<sup>2</sup> Corine Landcover Inventory

<sup>3</sup> Welsh Index of Multiple Deprivation 2014

Monmouthshire has some very distinct challenges, including the fastest growing proportion of its population in the over 65 and over 85 age bands, with a declining younger population and a median age of 48 years. Directly linked with this challenge, Monmouthshire has the highest average house prices in Wales creating an affordability issue and a deficit of 20-40 year olds as well as increasing household sizes. If left unchecked this will result in imbalanced communities and socio-economic problems. While the overall principle of directing development to brownfield sites is accepted, we must take action to ensure the social and economic sustainability of our communities and the services they rely on. This directly relates to the Well-being agenda. A Monmouthshire LDP is the best mechanism for achieving this outcome in a timely manner.

It is fully acknowledged that the daily lives of our constituents are not prescribed by administrative boundaries, and that commuting patterns, retail expenditure, and some aspects of the housing market operate across our boundaries with our neighbours, both east and west. We further recognise that changes such as the Metro and Severn Bridge tolls will have implications for much of the Cardiff Capital Region, and that developments such as at Mamhilad in Torfaen and Glan Llyn in Newport have potential implications for parts of our County. Your officers recently highlighted best practice in the joint Supplementary Planning Guidance between Swansea and Neath Port Talbot Councils to shape the new University campus straddling their boundary, which illustrates how such matters can be successfully addressed without a Joint LDP.

Similarly, my officers agree that the first round of LDPs could have been delivered more quickly and would have benefitted from better cross-boundary working, although it is noted that the regulations and manual to guide this process were both delayed initially and then revised during the process, interrupting progress. Avoiding such delays and changes going forward would benefit us all considerably. There has been a significant maturing of the approach to collaborative working since that first round of LDPs.

The benefits of working much closer with our neighbouring Councils is accepted and meetings have already been held at officer level to identify areas where we can work jointly to better manage resources, ensure a consistent evidence base, remove duplication and waste, share data, and utilise common methodologies. As you may be aware, significant work is already progressing via the South East Wales Strategic Planning Group (SEWSPG) to agree common methodologies for use across the Cardiff Capital Region. To this end, and in addition to the current SEWSPG collaboration, we will be proposing closer liaison/collaboration with those authorities who wish to review their LDP at the current time, including a shared evidence base for key topics. However, each Council will need to ultimately maintain control over timing and governance to responsibly manage the risk of no plan coverage.

Notwithstanding the above, I would respectfully suggest to you that mandating joint working is not the way to secure success. Joint working will not be sustainable or effective unless all parties enter into the arrangement willingly.

I note the comments in your letter, but would reassure you that I am confident that my Council has the capacity, capability and resilience to deliver our LDP and I am committed to ensuring it is properly resourced.

In conclusion, I share your goals of securing early progress on the SDP and ensuring full Plan coverage. However, having completed a full review of our LDP, consulted on the draft Review Report, and carried out an options appraisal with regard to the proposals set out in your letters, my position is that the best way forward is to proceed with the Cardiff Capital Region SDP and for Monmouthshire to commence on its own replacement LDP, working collaboratively with appropriate neighbouring Councils where possible, for example on a joint evidence base and common methodologies. My Cabinet Member for Enterprise will be seeking a Council resolution for the above on 19<sup>th</sup> March 2018.

I look forward to an early positive response on these matters to enable us to proceed in a timely manner.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Peter Fox', written in a cursive style.

**County Councillor Peter Fox OBE**  
**Leader of the Council**

## Options Appraisal – A Monmouthshire Perspective

This appraisal uses a traffic light system (red, amber & green) to show the level of impact that each of the 6 'options' has on the planning outcomes listed in the left hand column.  
**NOTE:** Monmouthshire County Council Officers support the preparation of a Strategic Development Plan (SDP) to provide a regional spatial framework for the future development and use of land. However, this appraisal considers the risks associated with the various options for plan revision as set out below.

**RED:** High impact




**AMBER:** Medium impact

**GREEN:** No or minimal impact



PLANNING OUTCOMES	OPTION 1 Monmouthshire LDP Revision, do not progress with SDP	OPTION 2 Local Planning Authorities in the region prepare a SDP & forego individual revisions of their respective LDPs	OPTION 3 Monmouthshire LDP Revision & preparation of SDP	OPTION 4 Joint LDP (Monmouthshire, Torfaen, Newport & Blaenau Gwent) & preparation of SDP	OPTION 5 Joint LDP (Monmouthshire & Torfaen) & preparation of SDP	OPTION 6 Joint LDP (Monmouthshire, Torfaen, Newport & Blaenau Gwent), do not progress with SDP
Continuous Plan coverage	●	●	●	●	●	●
Housing Delivery	●	●	●	●	●	●
Affordable Housing Delivery	●	●	●	●	●	●
S106 Contributions/CIL	●	●	●	●	●	●
Dealing with strategic Infrastructure issues	●	●	●	●	●	●
Dealing effectively with cross- boundary issues	●	●	●	●	●	●
Impact on a future SDP	●	●	●	●	●	●
Preparing a sound evidence base	●	●	●	●	●	●
Spatial coherence	●	●	●	●	●	●
Planning certainty & investor confidence	●	●	●	●	●	●


The most 'high impact risks' are associated with options 4 & 6.

**PLANNING OUTCOME: CONTINUOUS PLAN COVERAGE**




OPTIONS	COMMENTARY	RISK
<p><b>OPTION 1</b>  <b>Monmouthshire LDP Revision, do not progress with SDP</b></p>	<ul style="list-style-type: none"> <li>• The Revised Monmouthshire LDP will be adopted early 2022 providing up-to-date policy coverage to guide sustainable development.</li> <li>• Monmouthshire County Council (MCC) has the budget &amp; resources to undertake revision of its LDP.</li> <li>• Monmouthshire has the capacity, capability and resilience necessary to deliver a revised LDP in 4 years.</li> <li>• Opportunity to collaborate with adjacent local planning authorities to ensure a consistent evidence base, remove duplication and waste, share data and utilise common methodologies. This would provide in-built flexibility for the LDP to progress in the event that timetables diverged because of complexities or difficulties encountered by the adjacent local planning authorities. The risks associated with a policy vacuum would be substantially reduced compared to preparing a Joint LDP whilst still achieving the same planning outcomes.</li> <li>• No progress with the SDP would result in a lack of a proper regional spatial planning framework across the South East Wales region (contrary to provisions of the Planning Act in relation to 3 tier plans)</li> <li>• Resources could be focussed on LDP preparation if there was no involvement in SDP preparation.</li> </ul>	
<p><b>OPTION 2</b>  <b>Local Planning Authorities in the region prepare a SDP &amp; forego individual revisions of their respective LDPs</b></p>	<ul style="list-style-type: none"> <li>• Monmouthshire County Council Officers support the preparation of a SDP. However, the absence of a revised LDP would result in a policy vacuum, absence of allocated sites and protected designations (or an out of date LDP) and associated negative planning outcomes until the SDP is adopted.</li> <li>• A relaxation of the adopted LDP's end-date (which is also being presented as a solution to avoiding a potential policy vacuum by LPAs in the region) beyond 2021 would not provide a temporary solution for Monmouthshire until such time as a SDP is adopted. While there have been limited completions, the majority of the strategic housing sites within the Monmouthshire's LDP now have planning permission, there is subsequently a need to produce a new plan as soon as possible to ensure there are sufficient housing and employment opportunities in order to enable housing delivery. In addition to this a new plan is required to address aspirations/opportunities associated with City Deal, Future Monmouthshire and the removal of the Severn Bridge tolls.</li> <li>• The SDP will enable a proper regional spatial planning framework for the South East Wales region (in accordance with the provisions of the Planning Act 3 tier plans).</li> </ul>	
<p><b>OPTION 3</b>  <b>Monmouthshire LDP Revision &amp; preparation of SDP</b></p>	<ul style="list-style-type: none"> <li>• The Revised Monmouthshire LDP will be adopted early 2022 providing up-to-date policy coverage. In the event the SDP is delayed, up-to-date development plan coverage would be in place to guide sustainable development.</li> <li>• Monmouthshire County Council has the budget &amp; resources to undertake revision of its LDP.</li> <li>• Monmouthshire has the capacity, capability and resilience necessary to deliver a revised LDP in 4 years.</li> <li>• The Planning Policy Team is committed to meeting the challenge of preparing a revised LDP and being involved in the preparation of a SDP for South East Wales followed by a 'Light Touch' LDP. The provision of an additional fixed term post will assist in this process.</li> <li>• Opportunity to collaborate with adjacent local planning authorities to ensure a consistent evidence base, remove duplication and waste, share data and utilise common methodologies. This would provide in-built flexibility for the LDP to progress in the event that timetables diverged because of complexities or difficulties encountered by</li> </ul>	






	<p>the adjacent local planning authorities. The risks associated with a policy vacuum would be substantially reduced compared to preparing a Joint LDP whilst still achieving the same planning outcomes.</p> <ul style="list-style-type: none"> <li>• The SDP will enable a proper regional spatial planning framework for the South East Wales region (in accordance with the provisions of the Planning Act 3 tier plans).</li> <li>• Enable full consideration of the Council’s aspirations associated with Future Monmouthshire and City Deal and to address opportunities associated with the removal of the Severn Bridge tolls. Would also enable these considerations be fed into the SDP process.</li> </ul>	
<p><b>OPTION 4</b> <b>Joint LDP (Monmouthshire, Torfaen, Newport &amp; Blaenau Gwent) &amp; preparation of SDP</b></p>	<ul style="list-style-type: none"> <li>• The practicalities and potentially lengthy timescales involved in setting up and preparing such a large LDP is cause for concern given the LDP expiry date deadline. The proposed footprint provides neither proper regional planning on a CCR footprint nor a proper local plan that our communities can engage with and take ownership of.</li> <li>• There are significant concerns regarding the time and effort it would take to set up and run joint working arrangements (governance and culture, positive Member and Officer relationships, joint teams etc.) this would undoubtedly delay plan preparation.</li> <li>• It is acknowledged that there could be cost savings from Joint LDPs but could be achieved with shared evidence etc. (without working on a Joint plan)</li> <li>• Delays associated with establishing joint working arrangements would also act as a distraction from preparation of a SDP.</li> <li>• In view of the concerns raised above it is extremely unlikely that a Joint LDP on the footprint proposed could be adopted by 2021 therefore undermining full plan coverage, subsequently resulting in a policy vacuum for Monmouthshire, absence of allocated sites and protected designations (or an out of date LDP) and associated negative planning outcomes until the Joint LDP is adopted. In particular, the absence of a revised LDP would result in significant pressure to release greenfield sites in unsustainable locations and the potential situation of ‘Planning by Appeal’.</li> <li>• The Joint LDP would have to be adopted by each and every constituent full Council, if one Council doesn’t adopt the Joint LDP, none of the authorities would have a LDP resulting in a protracted policy vacuum. This option therefore presents considerable risk.</li> </ul>	
<p><b>OPTION 5</b> <b>Joint LDP (Monmouthshire &amp; Torfaen) &amp; preparation of SDP</b></p>	<ul style="list-style-type: none"> <li>• A Joint LDP will likely result in a policy vacuum as noted above. In theory the time taken to establish governance and working practices would be reduced by virtue of having only one partner however, it remains highly unlikely that a Joint Plan on a smaller footprint would be adopted by 2021 given issues associated with establishment and running of joint working arrangements.</li> <li>• It is acknowledged that there could be cost savings from Joint LDPs but could be achieved with shared evidence etc. (without working on a Joint plan)</li> <li>• Delays associated with establishing joint working arrangements would also act as a distraction from preparation of a SDP.</li> <li>• In view of the concerns raised above it is unlikely that a Joint LDP on the footprint proposed could be adopted by 2021 therefore undermining full plan coverage, subsequently resulting in a policy vacuum for Monmouthshire, absence of allocated sites and protected designations (or an out of date LDP) and associated negative planning outcomes until the Joint LDP is adopted. In particular, the absence of a revised LDP would result in significant pressure to release greenfield sites in unsustainable locations and the potential situation of ‘Planning by Appeal’.</li> </ul>	

	<ul style="list-style-type: none"> <li>• The Joint LDP would have to be adopted by both constituent full Councils, if one Council doesn't adopt the Joint LDP, neither authority would have a LDP resulting in a protracted policy vacuum. This option therefore presents considerable risk.</li> </ul>	
<p><b>OPTION 6</b>  <b>Joint LDP (Monmouthshire, Torfaen, Newport &amp; Blaenau Gwent), do not progress with SDP</b></p>	<ul style="list-style-type: none"> <li>• The practicalities and potentially lengthy timescales involved in setting up and preparing such a large LDP is cause for concern given the LDP expiry date deadline. The proposed footprint provides neither proper regional planning on a CCR footprint nor a proper local plan that our communities can engage with and take ownership of.</li> <li>• There are significant concerns regarding the time and effort it would take to set up and run joint working arrangements (governance and culture, positive Member and Officer relationships, joint teams etc.) this would undoubtedly delay plan preparation.</li> <li>• It is acknowledged that there could be cost savings from Joint LDPs but could be achieved with shared evidence etc. (without working on a Joint plan)</li> <li>• In view of the concerns raised above it is extremely unlikely that a Joint LDP on the footprint proposed could be adopted by 2021 therefore undermining full plan coverage, subsequently resulting in a policy vacuum for Monmouthshire, absence of allocated sites and protected designations (or an out of date LDP) and associated negative planning outcomes until the Joint LDP is adopted. In particular, the absence of a revised LDP would result in significant pressure to release greenfield sites in unsustainable locations and the potential situation of 'Planning by Appeal'.</li> <li>• The Joint LDP would have to be adopted by each and every constituent full Council, if one Council doesn't adopt the Joint LDP, none of the authorities would have a LDP resulting in a protracted policy vacuum. This option therefore presents considerably risk.</li> <li>• The Joint Plan on the proposed 4 Council footprint would relate to a sub-regional rather than local plan.</li> <li>• No progress with the SDP would result in a lack of a proper regional spatial planning framework across the South East Wales region (contrary to provisions of the Planning Act in relation to 3 tier plans)</li> <li>• Resources could be focussed on LDP preparation if there was no involvement in SDP preparation.</li> </ul>	

PLANNING OUTCOME: Housing Delivery





OPTIONS	COMMENTARY	RISK
<p><b>OPTION 1</b>  <b>Monmouthshire LDP Revision, do not progress with SDP</b></p>	<ul style="list-style-type: none"> <li>• The Revised Monmouthshire LDP will be adopted early 2022 providing an up-to-date policy framework and allocated sites which will facilitate a coordinated approach to housing delivery and associated infrastructure, however, this will have limited strategic focus without the links to the SDP.</li> <li>• A direction of travel will be provided at the Preferred Strategy stage (end of 2019/early 2020) which would guide development to preferred sustainable locations and address affordability issues in the short to medium term.</li> <li>• Provides an opportunity to realise MCC aspirations for future growth in the short term, however, consideration of a different strategy such as a new settlement would have limited support without links to the SDP. As a result this could hinder meeting the aims of affordability, rebalancing demography and sustaining rural communities/the County as a whole over the longer term.</li> <li>• There would be an opportunity to collaborate with adjacent local planning authorities to ensure a consistent evidence base and utilise common methodologies. This would provide in-built flexibility for the LDP to progress in the event that timetables diverged because of complexities or difficulties encountered by the adjacent local planning authorities. The risks associated with a policy vacuum would be substantially reduced compared to preparing a Joint LDP.</li> </ul>	
<p><b>OPTION 2</b>  <b>Local Planning Authorities in the region prepare a SDP &amp; forego individual revisions of their respective LDPs</b></p>	<ul style="list-style-type: none"> <li>• The absence of a revised LDP will result in a policy vacuum, absence of allocated sites and protected designations (or an out of date LDP) and associated negative planning outcomes until the SDP is adopted. As a consequence the LPA would be under significant pressure to release greenfield sites in unsustainable locations to accommodate housing delivery.</li> <li>• There is significant pressure in Monmouthshire for housing development, the County has the highest average house prices in Wales and traditionally constrained growth. Welsh Government policy to maximise take up of brownfield land may limit growth further within Monmouthshire due to lack of brownfield opportunities which would further impact on affordability.</li> <li>• MCC aspirations for future growth may not be realised in the short term which would impact on affordability and with the aims to rebalance demography and sustain rural communities/the County as a whole.</li> <li>• Would provide an opportunity to consider the potential for a new settlement in Monmouthshire.</li> <li>• The SDP will provide proper regional spatial planning framework for strategic housing delivery in the region.</li> <li>• Monmouthshire would have a lack of a 5 year housing land supply for a prolonged period of time (key Welsh Government requirement) until the SDP is adopted.</li> </ul>	
<p><b>OPTION 3</b>  <b>Monmouthshire LDP Revision &amp; preparation of SDP</b></p>	<ul style="list-style-type: none"> <li>• The Revised Monmouthshire LDP will be adopted early 2022 providing an up-to-date policy framework which will facilitate a coordinated approach to housing delivery and associated infrastructure. A direction of travel will be provided at the Preferred Strategy stage (end of 2019/early 2020) which would guide development to preferred sustainable locations.</li> <li>• Officers would at the same time be working on the revised LDP and collaboratively with the region to prepare a SDP, providing an opportunity to feed directly into the SDP process and identify any strategic opportunities.</li> </ul>	



	<ul style="list-style-type: none"> <li>• Provides an opportunity to realise MCC aspirations for future growth both in the short term and long term which would have a positive effect on affordability and assist in rebalancing demography while sustaining rural communities/the County as a whole.</li> <li>• This would properly enable the County’s housing delivery issues to be considered and to have full regard to aspirations/opportunities associated with the Cardiff Capital Region City Deal and Tolls removal</li> <li>• There would be an opportunity to collaborate with adjacent local planning authorities to ensure a consistent evidence base and utilise common methodologies. This would provide in-built flexibility for the LDP to progress in the event that timetables diverged because of complexities or difficulties encountered by the adjacent local planning authorities. The risks associated with a policy vacuum would be substantially reduced compared to preparing a Joint LDP. Would achieve better planning outcomes in a more timely manner through an individual Plan aligned to MCC’s aspirations.</li> <li>• Future growth areas that cross administrative boundaries could still be managed effectively in the interests of the region until the SDP is adopted via collaborative working, aligned policies/allocations and joint SPG.</li> <li>• The SDP will enable a proper regional spatial planning framework for the South East Wales region.</li> </ul>	
<p><b>OPTION 4</b>  <b>Joint LDP (Monmouthshire, Torfaen, Newport &amp; Blaenau Gwent) &amp; preparation of SDP</b></p>	<ul style="list-style-type: none"> <li>• Housing delivery in the short to medium term is likely to be compromised because of the lengthy plan preparation time associated with such a plan. This will result in a policy vacuum, absence of allocated sites and protected designations (or an out of date LDP) and associated negative planning outcomes until the Joint LDP is adopted. In particular, the absence of a revised LDP would result in significant pressure to release greenfield sites in unsustainable locations and the potential situation of ‘Planning by Appeal’.</li> <li>• Monmouthshire would have a lack of a 5 year housing land supply for a prolonged period of time (key Welsh Government requirement) until the Joint LDP is adopted.</li> <li>• It is accepted that a Joint LDP on this footprint would provide a framework for housing delivery in the longer term, however, such an approach would not deliver a proper regional approach to tackle the issues the Cardiff Capital Region faces, a SDP would however do this though.</li> <li>• There is significant pressure in Monmouthshire for housing development, the County has the highest average house prices in Wales and traditionally constrained growth. Welsh Government policy to maximise take up of brownfield land may limit growth further within Monmouthshire due to lack of brownfield opportunities which would further impact on affordability. Development may be directed to the other authorities within the proposed footprint.</li> <li>• MCC aspirations for future growth may not be realised which would impact on affordability and with the aims to rebalance demography and sustain rural communities/the County as a whole.</li> <li>• A Joint LDP on this footprint would, as a wider area, have a more balanced demography and affordability, but this would still be contained in pockets of extremes. A joint Plan would not address those challenges. It could adversely affect Monmouthshire’s aspirations if growth is directed to Newport or southern Torfaen.</li> </ul>	
<p><b>OPTION 5</b>  <b>Joint LDP (Monmouthshire &amp; Torfaen) &amp; preparation of SDP</b></p>	<ul style="list-style-type: none"> <li>• Housing delivery in the short to medium term is likely to be compromised because of the lengthy plan preparation time associated with a Joint plan. This will result in a policy vacuum, absence of allocated sites and protected designations (or an out of date LDP) and associated negative planning outcomes until the Joint LDP is adopted. In particular, the absence of a revised LDP would result in significant pressure to release greenfield sites in unsustainable locations and the potential situation of ‘Planning by Appeal’.</li> </ul>	

	<ul style="list-style-type: none"> <li>• Monmouthshire would have a lack of a 5 year housing land supply for a prolonged period of time (key Welsh Government requirement) until the Joint LDP is adopted.</li> <li>• It is accepted that a Joint LDP on this footprint would provide a framework for housing delivery in the longer term, however, such an approach would not deliver a proper regional approach to tackle the issues the Cardiff Capital Region faces, a SDP would however do this though.</li> <li>• There is significant pressure in Monmouthshire for housing development, the County has the highest average house prices in Wales and traditionally constrained growth. Welsh Government policy to maximise take up of brownfield land may limit growth further within Monmouthshire due to lack of brownfield opportunities which would further impact on affordability. Development may be directed to Torfaen.</li> <li>• MCC aspirations for future growth may not be realised which would impact on affordability and with the aims to rebalance demography and sustain rural communities/the County as a whole.</li> <li>• A Joint LDP on this footprint would, as a wider area, have a more balanced demography and affordability, but this would still be contained in pockets of extremes. A joint Plan would not address those challenges. It could adversely affect Monmouthshire’s aspirations if growth is directed southern Torfaen. A Joint LDP will likely result in a policy vacuum as noted in option 4, however, in theory the time taken to establish governance and working practices would be reduced by virtue of having only one partner however, it remains highly unlikely that a Joint plan on a smaller footprint would be adopted by 2021 given issues associated with establishment and running of joint working arrangements.</li> <li>• A Joint LDP may be beneficial in terms of cross-boundary growth, provided this does not quash Monmouthshire’s aspirations, or, affect the ability to sustain Monmouthshire’s communities and improve affordability.</li> </ul>	
<p><b>OPTION 6</b>  <b>Joint LDP (Monmouthshire, Torfaen, Newport &amp; Blaenau Gwent), do not progress with SDP</b></p>	<ul style="list-style-type: none"> <li>• Housing delivery in the short to medium term is likely to be compromised because of the lengthy plan preparation time associated with such a plan. This will result in a policy vacuum, absence of allocated sites and protected designations (or an out of date LDP) and associated negative planning outcomes until the Joint LDP is adopted. In particular, the absence of a revised LDP would result in significant pressure to release greenfield sites in unsustainable locations and the potential situation of ‘Planning by Appeal’.</li> <li>• Monmouthshire would have a lack of a 5 year housing land supply for a prolonged period of time (key Welsh Government requirement) until the Joint LDP is adopted.</li> <li>• It is accepted that a Joint LDP on this footprint would provide a framework for housing delivery in the longer term, however, such an approach would not deliver a proper regional approach to tackle the issues the Cardiff Capital Region faces.</li> <li>• There is significant pressure in Monmouthshire for housing development, the County has the highest average house prices in Wales and traditionally constrained growth. Welsh Government policy to maximise take up of brownfield land may limit growth further within Monmouthshire due to lack of brownfield opportunities which would further impact on affordability. Development may be directed to the other authorities within the proposed footprint.</li> <li>• MCC aspirations for future growth may not be realised which would impact on affordability and with the aims to rebalance demography and sustain rural communities/the County as a whole.</li> </ul>	

	<ul style="list-style-type: none"><li>• A Joint LDP on this footprint would, as a wider area, have a more balanced demography and affordability, but this would still be contained in pockets of extremes. A joint Plan would not address those challenges. It could adversely affect Monmouthshire's aspirations if growth is directed to Newport or southern Torfaen.</li><li>• No progress with the SDP would result in a lack of a proper regional spatial planning framework across the South East Wales region to address strategic housing delivery.</li><li>• The opportunity to progress a different strategy could have limited support without links to the SDP and would be best addressed through the SDP process.</li></ul>	
--	---	--

PLANNING OUTCOME: Affordable Housing Delivery

OPTIONS	COMMENTARY	RISK
<p><b>OPTION 1</b>  <b>Monmouthshire LDP Revision, do not progress with SDP</b></p>	<ul style="list-style-type: none"> <li>The Revised Monmouthshire LDP will be adopted early 2022 providing an up-to-date policy framework which will facilitate a coordinated approach to affordable housing delivery.</li> <li>Provides an opportunity to realise MCC aspirations for future growth in the short term, however, the ability to consider other strategic options for addressing housing need such as a new settlement would have limited support without links to the SDP. As a result this could hinder longer term affordability within Monmouthshire.</li> </ul>	
<p><b>OPTION 2</b>  <b>Local Planning Authorities in the region prepare a SDP &amp; forego individual revisions of their respective LDPs</b></p>	<ul style="list-style-type: none"> <li>The absence of a revised LDP will result in a policy vacuum, absence of allocated sites and protected designations (or an out of date LDP) and associated negative planning outcomes until the SDP is adopted. The ability to secure S106 contributions for affordable housing without the relevant policy hooks or supplementary planning guidance is of particular concern. A relaxation of the adopted LDP end date would not be an acceptable solution because the viability evidence that underpins the existing LDP would be considered out of date and subsequently subject to challenge. This would likely result in an uncoordinated approach to affordable housing delivery in Monmouthshire (in the short to medium term) compromising Welsh Government's objectives to deliver an additional 20,000 affordable homes.</li> <li>Monmouthshire has the highest average house prices in Wales. Welsh Government policy to maximise take up of brownfield land may limit growth further within Monmouthshire due to lack of brownfield opportunities which would further impact on affordability.</li> <li>MCC aspirations for future growth may not be realised in the short term which would impact further on affordability and the widening gap.</li> </ul>	
<p><b>OPTION 3</b>  <b>Monmouthshire LDP Revision &amp; preparation of SDP</b></p>	<ul style="list-style-type: none"> <li>The Revised Monmouthshire LDP will be adopted early 2022 providing an up-to-date policy framework which will facilitate a coordinated approach to affordable housing delivery to support the County as a whole.</li> <li>Provides an opportunity to realise MCC aspirations for future growth both in the short term and long term linked to Cardiff Capital Region City Deal, Future Monmouthshire and removal of the Severn Bridge Tolls (potential for a new settlement) which would have a positive effect on affordability.</li> <li>The SDP will provide proper regional spatial planning framework for strategic housing delivery in the region.</li> </ul>	
<p><b>OPTION 4</b>  <b>Joint LDP (Monmouthshire, Torfaen, Newport &amp; Blaenau Gwent) &amp; preparation of SDP</b></p>	<ul style="list-style-type: none"> <li>Affordable housing delivery in the short to medium term is likely to be compromised because of the lengthy plan preparation time associated with such a plan. The absence of a revised LDP will result in a policy vacuum, absence of allocated sites and protected designations (or an out of date LDP) and associated negative planning outcomes until the Joint LDP is adopted. The ability to secure S106 contributions for affordable housing without the relevant policy hooks or supplementary planning guidance is of particular concern. A relaxation of the adopted LDP end date would not be an acceptable solution because the viability evidence that underpins the existing LDP would be considered out of date and subsequently subject to challenge.</li> <li>There is a significant affordable housing need in Monmouthshire, the County has the highest average house prices in Wales and traditionally constrained growth. Welsh Government policy to maximise take up of brownfield land may limit growth further within Monmouthshire due to lack of brownfield opportunities which would further impact on the delivery of affordable housing. Development may be directed to the other authorities within the proposed footprint.</li> </ul>	

	<ul style="list-style-type: none"> <li>• MCC aspirations for future growth may not be realised which would impact further on affordability.</li> </ul>	
<p><b>OPTION 5</b>  <b>Joint LDP (Monmouthshire &amp; Torfaen) &amp; preparation of SDP</b></p>	<ul style="list-style-type: none"> <li>• Affordable housing delivery in the short to medium term is likely to be compromised because of the lengthy plan preparation time associated with a Joint plan. The absence of a revised LDP will result in a policy vacuum, absence of allocated sites and protected designations (or an out of date LDP) and associated negative planning outcomes until the Joint LDP is adopted. The ability to secure S106 contributions for affordable housing without the relevant policy hooks or supplementary planning guidance is of particular concern. A relaxation of the adopted LDP end date would not be an acceptable solution because the viability evidence that underpins the existing LDP would be considered out of date and subsequently subject to challenge.</li> <li>• There is a significant affordable housing need in Monmouthshire, the County has the highest average house prices in Wales and traditionally constrained growth. Welsh Government policy to maximise take up of brownfield land may limit growth further within Monmouthshire due to lack of brownfield opportunities which would further impact on the delivery of affordable housing. Development may be directed to Torfaen. MCC aspirations for future growth may not be realised which would impact further on affordability.</li> <li>• A Joint LDP will likely result in a policy vacuum as noted above in bullet point one, however, the time taken to establish governance and working practices would be reduced by virtue of having only one partner however, it remains highly unlikely that a Joint plan on a smaller footprint would be adopted by 2021 given issues associated with establishment and running of joint working arrangements.</li> </ul>	
<p><b>OPTION 6</b>  <b>Joint LDP (Monmouthshire, Torfaen, Newport &amp; Blaenau Gwent), do not progress with SDP</b></p>	<ul style="list-style-type: none"> <li>• Affordable housing delivery in the short to medium term is likely to be compromised because of the lengthy plan preparation time associated with such a plan. The absence of a revised LDP will result in a policy vacuum, absence of allocated sites and protected designations (or an out of date LDP) and associated negative planning outcomes until the Joint LDP is adopted. The ability to secure S106 contributions for affordable housing without the relevant policy hooks or supplementary planning guidance is of particular concern. A relaxation of the adopted LDP end date would not be an acceptable solution because the viability evidence that underpins the existing LDP would be considered out of date and subsequently subject to challenge.</li> <li>• There is a significant affordable housing need in Monmouthshire, the County has the highest average house prices in Wales and traditionally constrained growth. Welsh Government policy to maximise take up of brownfield land may limit growth further within Monmouthshire due to lack of brownfield opportunities which would further impact on the delivery of affordable housing. Development may be directed to the other authorities within the proposed footprint.</li> <li>• MCC aspirations for future growth may not be realised which would impact further on affordability.</li> </ul>	



PLANNING OUTCOME: Planning contributions







OPTIONS	COMMENTARY	RISK
<b>OPTION 1</b> <b>Monmouthshire LDP Revision, do not progress with SDP</b>	<ul style="list-style-type: none"> <li>Since adoption of the LDP, Monmouthshire has secured approximately £3.8million in financial contributions. An up to date revised LDP based on sound viability evidence would ensure a continued coordinated approach to securing financial contributions.</li> </ul>	●
<b>OPTION 2</b> <b>Local Planning Authorities in the region prepare a SDP &amp; forego individual revisions of their respective LDPs</b>	<ul style="list-style-type: none"> <li>The absence of a revised LDP will result in a policy vacuum, absence of allocated sites and protected designations (or an out of date LDP) and associated negative planning outcomes until the SDP is adopted. The ability to secure S106 contributions towards essential infrastructure and affordable housing without the relevant policy hooks or supplementary planning guidance is of significant concern. A relaxation of the adopted LDP end date would not be an acceptable solution because the viability evidence that underpins the existing LDP would be considered out of date and subsequently subject to challenge.</li> </ul>	●
<b>OPTION 3</b> <b>Monmouthshire LDP Revision &amp; preparation of SDP</b>	<ul style="list-style-type: none"> <li>Since adoption of the LDP, Monmouthshire has secured approximately £3.8million in financial contributions. An up to date revised LDP based on sound viability evidence would ensure a continued coordinated approach to securing financial contributions.</li> </ul>	●
<b>OPTION 4</b> <b>Joint LDP (Monmouthshire, Torfaen, Newport &amp; Blaenau Gwent) &amp; preparation of SDP</b>	<ul style="list-style-type: none"> <li>The absence of a revised LDP will result in a policy vacuum, absence of allocated sites and protected designations (or an out of date LDP) and associated negative planning outcomes until the SDP is adopted. The ability to secure S106 contributions towards essential infrastructure and affordable housing without the relevant policy hooks or supplementary planning guidance is of significant concern. A relaxation of the adopted LDP end date would not be an acceptable solution because the viability evidence that underpins the existing LDP would be considered out of date and subsequently subject to challenge.</li> <li>Monmouthshire has put CIL on hold pending conclusion of UK wide reforms. Newport has progressed CIL through examination but has chosen to delay adoption. Torfaen proposes to adopt CIL as part of its LDP revision. Blaenau Gwent has decided to not progress CIL due to viability in its area. CIL would need to be reviewed on the Joint LDP footprint to ensure a consistent viability approach.</li> </ul>	●
<b>OPTION 5</b> <b>Joint LDP (Monmouthshire &amp; Torfaen) &amp; preparation of SDP</b>	<ul style="list-style-type: none"> <li>The absence of a revised LDP will result in a policy vacuum, absence of allocated sites and protected designations (or an out of date LDP) and associated negative planning outcomes until the SDP is adopted. The ability to secure S106 contributions towards essential infrastructure and affordable housing without the relevant policy hooks or supplementary planning guidance is of significant concern. A relaxation of the adopted LDP end date would not be an acceptable solution because the viability evidence that underpins the existing LDP would be considered out of date and subsequently subject to challenge.</li> <li>Monmouthshire has put CIL on hold pending conclusion of UK wide reforms. Torfaen proposes to adopt CIL as part of its LDP revision CIL would need to be reviewed on the Joint LDP footprint to ensure a consistent viability approach.</li> </ul>	●
<b>OPTION 6</b> <b>Joint LDP (Monmouthshire, Torfaen, Newport &amp; Blaenau Gwent), do not progress with SDP</b>	<ul style="list-style-type: none"> <li>The absence of a revised LDP will result in a policy vacuum, absence of allocated sites and protected designations (or an out of date LDP) and associated negative planning outcomes until the SDP is adopted. The ability to secure S106 contributions towards essential infrastructure and affordable housing without the relevant policy hooks or supplementary planning guidance is of significant concern. A relaxation of the adopted LDP end date would not</li> </ul>	●

	<p>be an acceptable solution because the viability evidence that underpins the existing LDP would be considered out of date and subsequently subject to challenge.</p> <ul style="list-style-type: none"><li>• Newport has progressed CIL through examination but has chosen to delay adoption. Torfaen proposes to adopt CIL as part of its LDP revision. Blaenau Gwent has decided to not progress CIL due to viability in its area. CIL would need to be reviewed on the Joint LDP footprint to ensure a consistent viability approach.</li></ul>	
--	--	--






**PLANNING OUTCOME: Effective Management of Strategic Infrastructure Issues**

OPTIONS	COMMENTARY	RISK
<b>OPTION 1</b> <b>Monmouthshire LDP Revision, do not progress with SDP</b>	<ul style="list-style-type: none"> <li>Since adoption the LDP has contributed to significant levels of new infrastructure. The revision of the LDP will continue to provide the basis for the delivery of infrastructure in the short and medium term maintaining a sustainable approach to spatial planning. However, long term this will have limited strategic impact without the links to the SDP.</li> </ul>	●
<b>OPTION 2</b> <b>Local Planning Authorities in the region prepare a SDP &amp; forego individual revisions of their respective LDPs</b>	<ul style="list-style-type: none"> <li>The SDP will provide the mechanism for consensus to be reached on strategic and cross boundary infrastructure issues in the longer term. However, in the absence of a revised LDP and resultant policy vacuum (until adoption of the SDP) it would be a significant challenge to guide new development and its associated infrastructure to preferred sustainable locations, which could prejudice a future SDP Strategy.</li> <li>A SDP would enable a regional approach to strategic infrastructure but without a LDP or SDP in place there would not be appropriate policy hooks in place to secure contributions.</li> </ul>	●
<b>OPTION 3</b> <b>Monmouthshire LDP Revision &amp; preparation of SDP</b>	<ul style="list-style-type: none"> <li>Since adoption the LDP has contributed to significant levels of new infrastructure. The revision of the LDP will continue to provide the basis for the delivery of infrastructure in the short and medium term maintaining a sustainable approach to spatial planning.</li> <li>Officers would at the same time be working on the revised LDP and collaboratively with the region to prepare a SDP thus ensuring that the respective strategies align and that strategic cross boundary infrastructure issues are identified in addition to the mechanism for dealing with them effectively.</li> <li>The SDP would need to agree a mechanism for funding for strategic infrastructure.</li> </ul>	●
<b>OPTION 4</b> <b>Joint LDP (Monmouthshire, Torfaen, Newport &amp; Blaenau Gwent) &amp; preparation of SDP</b>	<ul style="list-style-type: none"> <li>A Joint LDP would provide the basis for the delivery of strategic infrastructure in the medium term on a sub-regional basis. However, the need for such a large Joint LDP area is considered unnecessary because the SDP will provide the mechanism for consensus to be reached on significant strategic and cross boundary infrastructure issues in the long term.</li> <li>A SDP would enable a regional approach to strategic infrastructure but during the period without a LDP or SDP is in place there would not be appropriate policy hooks in place to secure contributions.</li> <li>The SDP would need to agree a mechanism for funding for strategic infrastructure.</li> </ul>	●
<b>OPTION 5</b> <b>Joint LDP (Monmouthshire &amp; Torfaen) &amp; preparation of SDP</b>	<ul style="list-style-type: none"> <li>A Joint LDP would provide the basis for the delivery of strategic infrastructure in the medium term on a larger than local footprint. However, the need for such a Joint LDP area is questioned because the SDP will provide the mechanism for consensus to be reached on significant strategic and cross boundary infrastructure issues in the long term.</li> <li>A SDP would enable a regional approach to strategic infrastructure but during the period without a LDP or SDP is in place there would not be appropriate policy hooks in place to secure contributions.</li> <li>The SDP would need to agree a mechanism for funding for strategic infrastructure.</li> </ul>	●
<b>OPTION 6</b> <b>Joint LDP (Monmouthshire, Torfaen, Newport &amp; Blaenau Gwent), do not progress with SDP</b>	<ul style="list-style-type: none"> <li>In the absence of a SDP a Joint LDP would provide the basis for the delivery of strategic infrastructure in the medium term on a sub-regional basis. However, the SDP is required to provide the mechanism for consensus to be reached on significant and cross boundary issues in the long-term.</li> </ul>	●

**PLANNING OUTCOME: Dealing effectively with cross-boundary issues**

OPTIONS	COMMENTARY	RISK
<b>OPTION 1</b> <b>Monmouthshire LDP Revision, do not progress with SDP</b>	<ul style="list-style-type: none"> <li>It is considered that potential growth areas that cross administrative boundaries (similar to the existing LDP employment allocations at Gwent Europark and Mamhilad) could be identified in respective LDPs in addition to the mechanisms required to manage them effectively. This would ensure that a coordinated approach to spatial planning is maintained in the absence of a SDP. However, longer term this will have limited scope without the links to the SDP.</li> </ul>	
<b>OPTION 2</b> <b>Local Planning Authorities in the region prepare a SDP &amp; forego individual revisions of their respective LDPs</b>	<ul style="list-style-type: none"> <li>It is accepted that the SDP will provide the framework for dealing with cross-boundary issues in the longer term. However the absence of a revised LDP will result in a policy vacuum, absence of allocated sites and protected designations (or an out of date LDP) and associated negative planning outcomes until the SDP is adopted.</li> </ul>	
<b>OPTION 3</b> <b>Monmouthshire LDP Revision &amp; preparation of SDP</b>	<ul style="list-style-type: none"> <li>It is considered that potential growth areas that cross administrative boundaries (similar to the existing LDP employment allocations at Gwent Europark and Mamhilad) could be identified in respective LDPs in addition to the mechanisms required to manage them effectively. This would ensure that a coordinated approach to spatial planning is maintained (as an interim measure) until the SDP is adopted. The revised LDP would be consistent with the direction of travel identified in the National Development Framework and early on in the SDP process.</li> </ul>	
<b>OPTION 4</b> <b>Joint LDP (Monmouthshire, Torfaen, Newport &amp; Blaenau Gwent) &amp; preparation of SDP</b>	<ul style="list-style-type: none"> <li>It is accepted that in theory cross-boundary issues could be dealt with more effectively by virtue of having one larger spatial planning boundary such as developments close to Monmouthshire at Mamhilad in Torfaen and Glan Llyn in Newport. However, in reality any potential growth areas could be successfully achieved collaboratively without the need for a Joint LDP.</li> <li>The SDP will provide proper regional spatial planning framework to address cross-boundary issues.</li> </ul>	
<b>OPTION 5</b> <b>Joint LDP (Monmouthshire &amp; Torfaen) &amp; preparation of SDP</b>	<ul style="list-style-type: none"> <li>It is accepted that in theory cross-boundary issues could be dealt with more effectively by virtue of having one larger spatial planning boundary such as developments close to Monmouthshire at Mamhilad in Torfaen. However, in reality any potential growth areas could be successfully achieved collaboratively without the need for a Joint LDP.</li> <li>The SDP will provide proper regional spatial planning framework to address cross-boundary issues.</li> </ul>	
<b>OPTION 6</b> <b>Joint LDP (Monmouthshire, Torfaen, Newport &amp; Blaenau Gwent), do not progress with SDP</b>	<ul style="list-style-type: none"> <li>It is accepted that in theory cross-boundary issues could be dealt with more effectively by virtue of having one larger spatial planning boundary such as developments close to Monmouthshire at Mamhilad in Torfaen and Glan Llyn in Newport. However, in reality any potential growth areas could be successfully achieved collaboratively without the need for a Joint LDP.</li> <li>However, longer term this will have limited scope without the links to the SDP and the wider Cardiff Capital Region footprint.</li> </ul>	

**PLANNING OUTCOME: Impact on a future Strategic Development Plan**

OPTIONS	COMMENTARY	RISK
<p><b>OPTION 1</b>  <b>Monmouthshire LDP Revision, do not progress with SDP</b></p>	<ul style="list-style-type: none"> <li>• While the LPA would be able to realise MCC aspirations for future growth in the short term, the ability to progress a different strategy for example potentially a new settlement would have limited support without links to the SDP.</li> <li>• There would be an opportunity to collaborate with adjacent local planning authorities to ensure a consistent evidence base and utilise common methodologies, however, without links to a SDP an independent LDP could result in misalignment with the overall Cardiff Capital Region.</li> </ul>	
<p><b>OPTION 2</b>  <b>Local Planning Authorities in the region prepare a SDP &amp; forego individual revisions of their respective LDPs</b></p>	<ul style="list-style-type: none"> <li>• The absence of a revised LDP will result in a policy vacuum, absence of allocated sites and protected designations (or an out of date LDP) and associated negative planning outcomes until the SDP is adopted. As a consequence it would be difficult to guide new development and its associated infrastructure to preferred sustainable locations.</li> <li>• This option would see the region's resources focussed on delivering a SDP and subsequent light touch LDPs would all reflect the SDP strategy.</li> </ul>	
<p><b>OPTION 3</b>  <b>Monmouthshire LDP Revision &amp; preparation of SDP</b></p>	<ul style="list-style-type: none"> <li>• Officers would at the same time be working on the revised LDP and collaboratively with the region to prepare a SDP thus ensuring coherence and a regional approach. This would ensure that the revised Monmouthshire LDP does not prejudice or compromise a future SDP strategy whilst at the same time maintaining up-to-date LDP coverage.</li> <li>• A delay in progress of the SDP would result in a risk that the LDP would not align with the SDP strategy.</li> </ul>	
<p><b>OPTION 4</b>  <b>Joint LDP (Monmouthshire, Torfaen, Newport &amp; Blaenau Gwent) &amp; preparation of SDP</b></p>	<ul style="list-style-type: none"> <li>• There is concern that the lengthy preparation time associated with a Joint LDP would result in a policy vacuum, absence of allocated sites and protected designations (or an out of date LDP) and associated negative planning outcomes until the Joint LDP is adopted. In particular, the absence of a revised LDP would result in significant pressure to release greenfield sites in unsustainable locations for speculative development potentially compromising a future SDP strategy.</li> <li>• It is accepted that this option in the long term would ensure coherence on a sub-regional basis, however, with the region committed to preparation of a SDP the option to progress such a large Joint LDP is considered unnecessary and will not achieve better planning outcomes compared to option 3 in the short to medium term.</li> </ul>	
<p><b>OPTION 5</b>  <b>Joint LDP (Monmouthshire &amp; Torfaen) &amp; preparation of SDP</b></p>	<ul style="list-style-type: none"> <li>• There is concern that the lengthy preparation time associated with a Joint LDP would result in a policy vacuum, absence of allocated sites and protected designations (or an out of date LDP) and associated negative planning outcomes until the Joint LDP is adopted. In particular, the absence of a revised LDP would result in significant pressure to release greenfield sites in unsustainable locations for speculative development potentially compromising a future SDP strategy.</li> <li>• It is accepted that this option in the longer term would enable coherence on a larger than local basis, however, with the region committed to preparation of a SDP the option to progress such a Joint LDP area is considered unnecessary and will not achieve better planning outcomes compared to option 3 in the short to medium term.</li> </ul>	
<p><b>OPTION 6</b></p>	<ul style="list-style-type: none"> <li>• There is concern that the lengthy preparation time associated with a Joint LDP would result in a policy vacuum, absence of allocated sites and protected designations (or an out of date LDP) and associated negative planning outcomes until the Joint LDP is adopted. In particular, the absence of a revised LDP would result in significant</li> </ul>	






**Joint LDP (Monmouthshire, Torfaen, Newport & Blaenau Gwent), do not progress with SDP**

pressure to release greenfield sites in unsustainable locations for speculative development potentially compromising a future SDP strategy.

- In the absence of a SDP there would be no proper regional spatial planning framework to guide future development in the South East Wales region.
- It is accepted that this option in the long term would enable coherence on a sub-regional basis, however, with the rest of the Cardiff Capital Region committed to preparation of a SDP it would be irrational to progress the option of such a large Joint LDP.



**PLANNING OUTCOME: Preparing a sound evidence base**

OPTIONS	COMMENTARY	RISK
<p><b>OPTION 1</b>  <b>Monmouthshire LDP Revision, do not progress with SDP</b></p>	<ul style="list-style-type: none"> <li>• The cost of an individual revised LDP is anticipated to be significantly lower than the existing adopted LDP, given a requirement to update much of the original evidence base and focus on collaboration with other LPA's on a joint evidence base (as far as practicably possible).</li> <li>• There would be an opportunity to collaborate with adjacent local planning authorities to ensure a consistent evidence base and utilise common methodologies. This would provide in-built flexibility for the LDP to progress in the event that timetables diverged because of complexities or difficulties encountered by the adjacent local planning authorities. The risks associated with a policy vacuum would be substantially reduced compared to preparing a Joint LDP.</li> <li>• The SDP provides the proper basis for regional spatial planning and provides the platform for preparing a coordinated planning framework for the region to inform LDPs.</li> </ul>	
<p><b>OPTION 2</b>  <b>Local Planning Authorities in the region prepare a SDP &amp; forego individual revisions of their respective LDPs</b></p>	<ul style="list-style-type: none"> <li>• The majority of the existing LDP evidence base will be out of date and subject to challenge. Until the SDP is adopted, the absence of a revised LDP and lack of an up to date evidence base would result in a policy vacuum, absence of allocated sites and protected designations and associated negative planning outcomes, including risks associated with outdated viability evidence and significant pressure for speculative development in undesirable locations.</li> </ul>	
<p><b>OPTION 3</b>  <b>Monmouthshire LDP Revision &amp; preparation of SDP</b></p>	<ul style="list-style-type: none"> <li>• The cost of an individual revised LDP is anticipated to be significantly lower than the existing adopted LDP, given a requirement to update much of the original evidence base and focus on collaboration with other LPA's on a joint evidence base (as far as practicably possible).</li> <li>• There would be an opportunity to collaborate with adjacent local planning authorities to ensure a consistent evidence base and utilise common methodologies. This would provide in-built flexibility for the LDP to progress in the event that timetables diverged because of complexities or difficulties encountered by the adjacent local planning authorities. The risks associated with a policy vacuum would be substantially reduced compared to preparing a Joint LDP.</li> </ul>	
<p><b>OPTION 4</b>  <b>Joint LDP (Monmouthshire, Torfaen, Newport &amp; Blaenau Gwent) &amp; preparation of SDP</b></p>	<ul style="list-style-type: none"> <li>• Such a Joint LDP would require the preparation of an entirely new evidence base to reflect that the footprint of the Joint LDP area which would be one spatial planning area. It is unlikely that existing evidence could be updated and disaggregated.</li> <li>• It could be argued that this expenditure would be better spent on the preparation of a regional SDP evidence base.</li> </ul>	
<p><b>OPTION 5</b>  <b>Joint LDP (Monmouthshire &amp; Torfaen) &amp; preparation of SDP</b></p>	<ul style="list-style-type: none"> <li>• Such a Joint LDP would require the preparation of an entirely new evidence base to reflect that the footprint of the Joint LDP area which would be one spatial planning area. It is unlikely that existing evidence could be updated and disaggregated.</li> <li>• It could be argued that this expenditure would be better spent on the preparation of a regional SDP evidence base.</li> </ul>	







**OPTION 6**  
**Joint LDP (Monmouthshire, Torfaen, Newport & Blaenau Gwent), do not progress with SDP**

- Such a Joint LDP would require the preparation of an entirely new evidence base to reflect that the footprint of the Joint LDP area which would be one spatial planning area. It is unlikely that existing evidence could be updated and disaggregated.
- The SDP provides the proper basis for regional spatial planning and provides the platform for preparing a coordinated planning framework for the region to inform LDPs.











PLANNING OUTCOME: Spatial coherence

OPTIONS	COMMENTARY	RISK
<b>OPTION 1</b> <b>Monmouthshire LDP Revision, do not progress with SDP</b>	<ul style="list-style-type: none"> <li>In terms of spatial coherence a revised Monmouthshire LDP would offer the flexibility for Monmouthshire to adapt to any future footprints established by Local Government Re-organisation.</li> <li>Cross-boundary issues can be addressed via collaborative working, common methodologies or shared evidence however a SDP is the best governance mechanism to ensure spatial coherence on the regional basis.</li> </ul>	
<b>OPTION 2</b> <b>Local Planning Authorities in the region prepare a SDP &amp; forego individual revisions of their respective LDPs</b>	<ul style="list-style-type: none"> <li>A SDP will provide a regional spatial planning framework for the whole Cardiff Capital Region, aligning with the Economic Development Strategy and Regional Transport Plan.</li> </ul>	
<b>OPTION 3</b> <b>Monmouthshire LDP Revision &amp; preparation of SDP</b>	<ul style="list-style-type: none"> <li>In terms of spatial coherence a revised Monmouthshire LDP would offer the flexibility for Monmouthshire to adapt to any future footprints established by Local Government Re-organisation.</li> <li>Cross-boundary issues can be addressed via collaborative working, common methodologies or shared evidence. A SDP will provide a regional spatial planning framework for the whole Cardiff Capital Region, aligning with the Economic Development Strategy and Regional Transport Plan.</li> </ul>	
<b>OPTION 4</b> <b>Joint LDP (Monmouthshire, Torfaen, Newport &amp; Blaenau Gwent) &amp; preparation of SDP</b>	<ul style="list-style-type: none"> <li>The footprint proposed predetermines the footprints for Local Government Reform – could create inefficiencies and difficulties if the footprint of Joint LDPs do not align with any new footprints that might be established in the medium term.</li> <li>A SDP will provide a regional spatial planning framework for the whole Cardiff Capital Region, aligning with the Economic Development Strategy and Regional Transport Plan.</li> </ul>	
<b>OPTION 5</b> <b>Joint LDP (Monmouthshire &amp; Torfaen) &amp; preparation of SDP</b>	<ul style="list-style-type: none"> <li>The footprint proposed predetermines the footprints for Local Government Reform – could create inefficiencies and difficulties if the footprints of Joint LDPs do not align with any new footprint that might be established in the medium term. However the risk is lower than a four way footprint.</li> <li>A SDP will provide a regional spatial planning framework for the whole Cardiff Capital Region, aligning with the Economic Development Strategy and Regional Transport Plan.</li> </ul>	
<b>OPTION 6</b> <b>Joint LDP (Monmouthshire, Torfaen, Newport &amp; Blaenau Gwent), do not progress with SDP</b>	<ul style="list-style-type: none"> <li>The footprint proposed predetermines the footprints for Local Government Reform – could create inefficiencies and difficulties if the footprints of Joint LDPs do not align with any new footprint that might be established in the medium term.</li> <li>Cross-boundary issues can be addressed via collaborative working, common methodologies or shared evidence however a SDP is the best governance mechanism to ensure spatial coherence on the regional basis.</li> </ul>	

**PLANNING OUTCOME: Planning certainty and confidence**

OPTIONS	COMMENTARY	RISK
<p><b>OPTION 1</b>  <b>Monmouthshire LDP Revision, do not progress with SDP</b></p>	<ul style="list-style-type: none"> <li>• The Annual Monitoring Reports produced since adoption of the LDP evidences that the Monmouthshire LDP has been successful in delivering the spatial strategy, however, the lack of a 5 year land supply is of concern. As a consequence there is a need to identify additional sites as a matter of urgency.</li> <li>• The commencement of a revised LDP would ensure development plan coverage and investor confidence is maintained. Developers in the Monmouthshire area have indicated a preference for a full revision of the LDP to facilitate the identification/allocation of additional housing land to ensure the continued delivery of new housing development and address the shortfall in housing supply.</li> </ul>	
<p><b>OPTION 2</b>  <b>Local Planning Authorities in the region prepare a SDP &amp; forego individual revisions of their respective LDPs</b></p>	<ul style="list-style-type: none"> <li>• Monmouthshire County Council officers support the preparation of a SDP to provide a regional spatial framework for the future development and use of land. However, the absence of a revised LDP would result in a policy vacuum, absence of allocated sites and protected designations (or an out of date LDP) until either a Joint LDP or SDP is adopted. This combined with the lack of 5 years housing land supply would result in significant pressure for speculative development in undesirable locations. As a consequence the LPA would be under significant pressure to release greenfield sites in unsustainable locations to accommodate housing delivery and the potential situation of 'Planning by Appeal'.</li> <li>• Without an up to date LDP, there is concern that the Development Management process would be severely undermined resulting in a loss of confidence in the planning system from Officers, Members and the general public.</li> </ul>	
<p><b>OPTION 3</b>  <b>Monmouthshire LDP Revision &amp; preparation of SDP</b></p>	<ul style="list-style-type: none"> <li>• The Annual Monitoring Reports produced since adoption of the LDP evidences that the Monmouthshire LDP has been successful in delivering the spatial strategy, however, the lack of a 5 year land supply is of concern. As a consequence there is a need to identify additional sites as a matter of urgency.</li> <li>• The commencement of a revised LDP would ensure development plan coverage and investor confidence is maintained. Developers in the Monmouthshire area have indicated a preference for a full revision of the LDP to facilitate the identification/allocation of additional housing land to ensure the continued delivery of new housing development and address the shortfall in housing supply.</li> </ul>	
<p><b>OPTION 4</b>  <b>Joint LDP (Monmouthshire, Torfaen, Newport &amp; Blaenau Gwent) &amp; preparation of SDP</b></p>	<ul style="list-style-type: none"> <li>• Monmouthshire County Council Officers support the preparation of a SDP to provide a regional spatial framework for the future development and use of land. However, the delays associated with producing a revised Joint LDP would result in a policy vacuum, absence of allocated sites and protected designations (or an out of date LDP) until either a Joint LDP or SDP is adopted. This combined with the lack of 5 years housing land supply would result in significant pressure for speculative development in undesirable locations. As a consequence the LPA would be under significant pressure to release greenfield sites in unsustainable locations to accommodate housing delivery and the potential situation of 'Planning by Appeal'.</li> <li>• Without an up to date LDP, there is concern that the Development Management process would be severely undermined resulting in a loss of confidence in the planning system from Officers, Members and the general public.</li> </ul>	

	<ul style="list-style-type: none"> <li>• Preparation of a Joint LDP on this footprint will significantly increase plan preparation time and there is a risk of a Joint LDP not being adopted by all constituent Councils.</li> </ul>	
<p><b>OPTION 5</b>  <b>Joint LDP</b>  <b>(Monmouthshire &amp; Torfaen) &amp;</b>  <b>preparation of SDP</b></p>	<ul style="list-style-type: none"> <li>• Monmouthshire County Council Officers support the preparation of a SDP to provide a regional spatial framework for the future development and use of land. However, the delays associated with producing a revised Joint LDP would result in a policy vacuum, absence of allocated sites and protected designations (or an out of date LDP) until either a Joint LDP or SDP is adopted. This combined with the lack of 5 years housing land would result in significant pressure for speculative development in undesirable locations. As a consequence the LPA would be under significant pressure to release greenfield sites in unsustainable locations to accommodate housing delivery and the potential situation of 'Planning by Appeal'.</li> <li>• Without an up to date LDP, there is concern that the Development Management process would be severely undermined resulting in a loss of confidence in the planning system from Officers, Members and the general public.</li> <li>• Preparation of a Joint LDP will increase plan preparation time and there is a risk of it not being adopted by both constituent Councils.</li> </ul>	
<p><b>OPTION 6</b>  <b>Joint LDP (Monmouthshire, Torfaen,</b>  <b>Newport &amp; Blaenau Gwent), do not</b>  <b>progress with SDP</b></p>	<ul style="list-style-type: none"> <li>• The delays associated with producing a revised Joint LDP would result in a policy vacuum, absence of allocated sites and protected designations (or an out of date LDP) until either a Joint LDP is adopted. This combined with the lack of 5 years housing land supply would result in significant pressure for speculative development in undesirable locations. As a consequence the LPA would be under significant pressure to release greenfield sites in unsustainable locations to accommodate housing delivery and the potential situation of 'Planning by Appeal'.</li> <li>• Without an up to date LDP, there is concern that the Development Management process would be severely undermined resulting in a loss of confidence in the planning system from Officers, Members and the general public.</li> <li>• Preparation of a Joint LDP will significantly increase plan preparation time and there is a risk of a Joint LDP not being adopted by all constituent Councils.</li> </ul>	

This page is intentionally left blank



**Monmouthshire County Council**  
**Local Development Plan**

**LDP Revision**  
**Draft Delivery Agreement**

**March 2018**

**Planning Policy Service**

**Monmouthshire County Council**

County Hall, Rhadyr, Usk, Monmouthshire NP15 1GA

**Tel:** 01633 644429

**Email:** [planningpolicy@monmouthshire.gov.uk](mailto:planningpolicy@monmouthshire.gov.uk)

## CONTENTS

	<b>Page</b>
Part 1 - Introduction	1
Part 2 – Timetable	6
Part 3 – Community Involvement Scheme	10
 Appendices:	
1. List of Consultation Bodies	25
2. Timetable for Revision of the LDP	30
3. Risk Assessment	33
4. Glossary of terms	37

## 1.0 Part 1 - Introduction

- 1.1 A full review of the Monmouthshire Local Development Plan 2011 – 2021 (adopted 27<sup>th</sup> February 2014) has been undertaken, the findings of which are set out in the LDP Review Report. The Review Report provides an overview of the issues that have been considered as part of the full review process and subsequently identifies any changes that are likely to be needed to the LDP, based on evidence. It concludes by recommending that the Council commence the preparation of a revised LDP following the full revision procedure. The final Review Report is published alongside the Draft Delivery Agreement.
- 1.2 The adopted Monmouthshire Local Development Plan (February 2014) remains extant and will continue to provide the policy framework for the determination of planning applications while the Revised LDP is being prepared. This will remain in force until 31 December 2021 or on adoption of a revised LDP, if sooner<sup>1</sup>.

### **Purpose of a Delivery Agreement**

- 1.3 The Revised LDP will cover the 2018-2033 period. Preparation of a Delivery Agreement<sup>2</sup> is a key requirement in preparing a revised plan. This document provides details of the various stages involved in the Plan-making process and the time each part of the process is likely to take, as well as the resources that the Council will commit to Plan preparation. It also sets out the way in which the Council proposes to involve the local community and other stakeholders in the preparation of the revised LDP. The revised LDP will be examined by an independent Inspector to test whether the Plan is sound and has been prepared in accordance with its Delivery Agreement.
- 1.4 The Delivery Agreement is split into two key parts:
- The **Timetable** for producing the revised LDP. This provides a clear indication of when each of the different stages of plan preparation will take place. Definitive dates are provided up to the deposit stage and indicative dates for later stages. This is an example of a project management approach to ensure that the plan is adequately resourced and delivered on time. The timetable is included in *Part 2* of this Delivery Agreement.
  - The **Community Involvement Scheme** outlines the Authority's principles of community engagement; its approach in relation to who, how and when it intends to engage with the community and stakeholders, how it will respond to representations and how these representations will inform later stages of plan preparation. This is included as *Part 3* of this Delivery Agreement.

---

<sup>1</sup> Section 62 (9) Planning and Compulsory Purchase Act 2004 (as amended Planning (Wales) Act 2015)

<sup>2</sup> Section 63 (1) Planning and Compulsory Purchase Act 2004 & Regulations 5 – 10 LDP (Wales) Regulations (as amended 2015)

1.5 A glossary of terms can be found in Appendix 4.

### **Draft Delivery Agreement Consultation**

1.6 This Draft Delivery Agreement (DA) is currently being consulted upon with specific consultation bodies to seek views on the timetable and community involvement scheme. Following targeted consultation on the Draft Delivery Agreement, the Council will:

- Consider the consultation responses and revise the DA as appropriate.
- Report the updated DA to Council for approval.
- Submit DA to Welsh Government for agreement.
- Publish DA on Council website and place in Planning Reception and Community Hubs/Libraries across the County.
- Review DA on a regular basis (quarterly).

### **Preparation of the Revised LDP**

1.7 In preparing the revised LDP the Council will aim to achieve the following key objectives<sup>3</sup>:

- Facilitate Sustainable Development by fully integrating a Sustainability Appraisal (incorporating Strategic Environmental Assessment) into the plan making process. A Well-being Assessment and Health Impact Assessment will also be produced.
- Ensure early and effective community involvement in order to consider a wide range of views, with the aim of building a broad consensus on the strategy and policies for the revised LDP.
- Enable policy integration by producing a revised LDP that is internally consistent with other corporate priorities and other policies and strategies at the national, regional and local level, appreciating the need to avoid unnecessary repetition.
- Deliver a fast and responsive approach to plan-making.
- Produce a revised LDP that is strategic, concise and distinctive in setting out how Monmouthshire will develop and change, with particular regard to the well-being of future generations whilst also addressing key issues collaboratively with adjacent local planning authorities.
- Deliver sustainable development, with full consideration of infrastructure requirements, availability of resources, viability and market factors.

1.8 The revised LDP will be prepared with regard to a wide range of legislation, policies and other initiatives at the European, national, regional and local level. The emerging Local Well-Being Plan (LWBP) will be of particular importance at the local level. The LWBP relates to the economic, social, environmental and cultural well-being of Monmouthshire and will have clear links with the LDP where it relates to land use planning.

---

<sup>3</sup> Welsh Government LDP Manual (Edition 2, 2015)



## **Sustainability Appraisal incorporating Strategic Environmental Assessment (SA/SEA)**

- 1.9 A Sustainability Appraisal<sup>4</sup>, (SA) incorporating Strategic Environmental Assessment<sup>5</sup> (SEA) is a statutory requirement of LDP preparation, in order to assess the environmental, social and economic implications of the plans strategy and policies. The SA/SEA process is utilised to ensure that policies in the LDP reflect sustainable development principles and take into account the significant effects of the plan on the environment. SA, incorporating SEA, was an iterative process throughout the preparation of the adopted LDP and is reflected in the Plan's proposals and policies.
- 1.10 The Council will continue to adopt an integrated approach to the SA/SEA of the revised LDP, ensuring that the revised plan is internally consistent, with economic and social issues considered alongside other matters. The appraisal process will run concurrently with the plan making process and forms an iterative part of plan preparation.
- 1.11 The SA, incorporating the SEA will be undertaken as follows:
- A Sustainability Appraisal Scoping Report. This will identify the existing sustainability issues in the Monmouthshire area and provide baseline information along with a review of plans, policies, programmes and strategies. The existing SA indicators and objectives will be revised and updated as necessary. A revised Sustainability Framework will be produced.
  - An Initial Sustainability Appraisal Report (ISAR). This will predict and evaluate the effects of the LDP options, spatial strategy and strategic policies on the social, environmental and economic objectives as set out in the Scoping Report. The ISAR will be published at the same time as the Preferred Strategy and updated when the revised Deposit LDP is prepared.
  - A Final Sustainability Appraisal Report (SAR). This will bring together all elements of the SA and take into account the binding recommendations of the Planning Inspector. The Final SAR will be published following receipt of the Inspectors Report.
  - A Sustainability Appraisal Adoption Statement will be published to explain how the sustainability considerations and the Sustainability Assessment have been taken into consideration in the production of the revised LDP.

---

<sup>4</sup> Section 62 (6) Planning and Compulsory Purchase Act 2004

<sup>5</sup> European Union Directive 2001/42/EC & Environmental Assessment of Plans and Programmes (Wales) Regulations 2004

## **Habitats Regulations Assessment (HRA)**

1.12 The Habitats Directive<sup>6</sup> requires that land use plans, including LDPs, are subject to an additional Habitats Regulations Assessment where there are sites of European significance for nature conservation purposes. Monmouthshire includes a range of international nature conservation designated sites such as Special Areas of Conservation and a RAMSAR site. Habitats Regulations Assessment will be undertaken alongside SA/SEA to ensure an integrated approach to assessment. It is intended that the process will again run concurrently with the plan making process and form an iterative part of plan preparation.

1.13 There are two stages of Habitats Regulation Assessment:

- Screening
- Habitats Regulations Assessment

## **Evidence Base Assessments**

1.14 As outlined in each of the published Annual Monitoring Reports, and the Review Report, there is a need to update and undertake various evidence base assessments throughout the preparation of the revised LDP. At this stage it is envisaged that this will include:

- Needs assessments in relation to population, housing, employment and retail
- Additional land allocations to meet the chosen growth strategy for the new Plan period
- Affordable Housing Viability Assessment
- Local Housing Market Assessment
- Sustainable settlement hierarchy
- Urban capacity study
- Employment Land Review
- Amenity Open Space survey
- Settlement boundary review
- Renewable Energy Assessment
- Infrastructure Plan

This is not a definitive list and additional evidence base update requirements may emerge as the plan revision progresses.

## **Well-being of Future Generations Act**

1.15 The Well Being of Future Generations (Wales) Act (WBFG) gained Royal Assent in April 2015. The Act aims to make a difference to lives of people in Wales in relation to seven well-being goals and also sets out five ways of working. The seven well-being goals relate to; a prosperous Wales, a resilient Wales, a healthier Wales, a more equal

---

<sup>6</sup> 92/43/EC

Wales, a Wales of cohesive communities, a Wales of vibrant culture and Welsh language, and, a globally responsible Wales. The five ways of working are long-term, integration, involvement, collaboration and prevention. Given that sustainable development is the core underlying principle of the LDP (and SEA), there are clear associations between both the LDP and the WCFG Act. As a requirement of the Act a Local Well-being Plan (LWBP) must be produced, which is currently in the process of being finalised. This plan will look at the economic, social, environmental and cultural well-being of the county and will have clear links with the LDP. Both the WCFG Act and the LWBP will be considered fully throughout the preparation of the revised LDP, which will follow the five ways of working.

### Tests of Soundness

- 1.16 ‘Soundness’ is an integral part of the LDP system and is an important principle by which it may be demonstrated as to whether the LDP shows good judgement and is able to be trusted. If the revised LDP is found not to be sound then the Welsh Government could require the Council to take necessary action to remedy the situation. This may involve returning to the very early stages of plan preparation thereby causing considerable delay in the preparation of the plan.
- 1.17 The Council must submit the revised LDP to the Welsh Government for examination. An independent Inspector is appointed by the WG to undertake this examination to determine whether the Plan is fundamentally sound. The Inspector will assess whether the preparation of the plan has been undertaken in accordance with legal and regulatory procedural requirements, and, complies with the Community Involvement Scheme. The Inspector must also determine whether the Plan meets the three soundness tests<sup>7</sup>:
- **Test 1 – Does the plan fit?** (i.e. is it clear that the LDP is consistent with other plans?);
  - **Test 2 – Is the plan appropriate?** (i.e. is the plan appropriate for the area in the light of the evidence?);
  - **Test 3 – Will the plan deliver?** (i.e. is it likely to be effective?).
- 1.18 The conclusions reached by the Inspector will be binding and, unless the Welsh Government intervenes, the Council must accept the changes required by the Inspector and adopt the revised LDP.

---

<sup>7</sup> Welsh Government LDP Manual (Edition 2, August 2015)

## 2.0 Part 2 - Timetable

- 2.1 The Council has established a timetable summarising the key stages in plan preparation (Table 1), which while challenging, provides a realistic timeframe for preparation of the replacement LDP having regard to the resources available. In preparing the timetable, regard has been given to the WG's expectation that a revised plan can be prepared in considerably less than 4 years, taking into account the resources available and the extent of changes required (Planning Policy Wales Edition 9, November 2016). Moreover, it has regard to the fact that the current LDP expires in December 2021 and there is a pressing need to maintain Plan coverage.
- 2.2 Table 1 is split into definitive and indicative stages:
- **Definitive Stages** – This part of the timetable provides information up to and inclusive of the statutory Deposit stage. The progress of the Plan over this period is under the direct control of the Council and therefore target dates, while challenging, are considered realistic and every effort will be made to adhere to these dates.
  - **Indicative Stages** – This part of the timetable provides for the stages of plan preparation beyond the statutory Deposit stage. These stages are increasingly dependent on a wide range of external factors (e.g. the number of representations received, number of examination hearing sessions, time taken to receive Inspector's Report) over which the Council has far less control. Those dates will be reconsidered after reaching the Deposit stage when definitive timings for the remaining stages will be prepared and submitted to the Welsh Government for agreement and publication.

**Table 1 - Key stages in Replacement Plan Preparation**

Key Stages	Timescale	
	From	To
Delivery Agreement	January 2018	May 2018
	Full Council – May 2018 Submission to Welsh Government – May 2018 (Response to LPA to be received within 4 weeks)	
Pre-Deposit Participation	July 2018	November 2019
	Report to Council on draft Preferred Strategy – November 2019	
Preferred Strategy (Pre-Deposit) Consultation.	December 2019	October 2020
	Preferred Strategy - 6 week consultation Report to Council on draft Deposit Plan – October 2020	
Statutory Deposit Plan Consultation	November 2020	May 2021
	Deposit Plan - 6 week consultation Report to Council on focused changes and submission of Deposit Plan to Welsh Government – May 2021	

Stages	Timescale
Indicative	
Submission of LDP to Welsh Government	Summer 2021
Independent Examination	Autumn 2021
Inspector's Report	Winter 2021
Adoption	Early 2022 (must be adopted within 8 weeks of receiving the Inspector's binding report)

- 2.3 A detailed project plan outlining the timescale for each of the stages of plan preparation is included in Appendix 2.

### Resources

- 2.4 The Head of Planning, Housing and Place-Shaping will be responsible for the overall delivery of the revised LDP, with the Planning Policy Manager responsible for the day-to-day project management. The Planning Policy Team will lead in the preparation and delivery of the revised LDP with Member engagement and political reporting at appropriate stages. The existing staff resources are set out in Table 2 below, approximately 80% of officer time will be dedicated to the LDP to account for day to day involvement in liaison with colleagues in development management and also to account for regional working. Additional time will be dedicated by the Head of Planning, Housing and Place-Shaping to the efficient delivery of the replacement LDP. It will also be necessary to call upon staff resources from other internal departments to assist in undertaking various evidence base updates/assessments. This is likely to include officer support from; Development Management, Heritage, Housing, Highways, Business and Enterprise, Green Infrastructure, Education, Democratic Services and Legal Services.

**Table 2 – Planning Policy Staff Resources**

Officer Job Title	Number of posts
Planning Policy Manager	1.5. (0.5FTE Manager due to retire in June 18, this 0.5 post will subsequently be deleted).
Principal Planning Policy Officer	1
Senior Planning Policy Officer	2 (this includes an additional fixed term post)
Planning Policy Research Officer	1

- 2.5 The Council recognises that additional professional specialist services will also be required to progress and establish a robust evidence base to inform the revised LDP. While it is anticipated that a considerable amount of evidence base work will be undertaken by MCC officers, predominately Planning Policy, the use of external consultants is likely to be necessary, particularly in relation to highly

technical/specialist elements of the evidence base. An initial assessment has been carried out of the elements of plan preparation that are likely to require external consultant input and financial resources have been secured accordingly.

- 2.6 The Delivery Agreement has been prepared on the basis of a revised Monmouthshire Local Development Plan only. Work is however on-going on a regional basis, collaboration with neighbouring authorities will be fundamental to the preparation of the revised LDP, particularly with regard to a joint evidence base, where appropriate. The South East Wales Strategic Planning Group (SEWSPG) is working towards a set of regionally agreed methodologies for key topic areas to ensure a consistent evidence base throughout the Cardiff Capital Region. In addition, Monmouthshire and Torfaen Councils have identified a number of topic areas where an evidence base could be prepared jointly.
- 2.7 A sufficient budget is available to progress the revised LDP to adoption within the prescribed timetable. It is anticipated that this will cover expenditure relating to all elements of preparation of the revised LDP and the Independent Examination.

#### **Risk Management and Analysis**

- 2.8 While the timetable for preparation of the revised LDP is realistic, it is acknowledged that it will also be challenging. It is recognised that there are a number of factors that could result in plan preparation deviating from the proposed timetable. The timetable consequently allows for flexibility through a degree of tolerance of up to 3 month delay, before a formal revision to the Delivery Agreement is required. Appendix 3 sets out a risk assessment including a number of potential issues that could cause difficulties in keeping to the proposed timetable, together with the Council's proposed approach to managing them.

#### **Supplementary Planning Guidance (SPG)**

- 2.9 The revised LDP will contain sufficient policies to provide the basis for determining planning applications. However, SPG has an important supporting role in providing more detailed or site specific guidance on the way in which LDP policies will be applied. While SPG does not form part of a development plan it should be derived from and be consistent with the relevant LDP. The SPG should also be clearly cross referenced to the policies and proposals it supplements.
- 2.10 Since the adoption of the current LDP a total of 8 Supplementary Planning Guidance documents have been prepared and adopted to support existing LDP policies. The SPG cover the following topic areas:
- Green Infrastructure, April 2015
  - Conversion of Agricultural Buildings Design Guide SPG April, 2015
  - LDP Policies H5 & H6 Replacement Dwellings in the Open Countryside and Extension of Rural Dwellings SPG, April 2015
  - Affordable Housing SPG, March 2016

- Renewable Energy and Energy Efficiency SPG, March 2016
- Primary Shopping Frontages Supplementary Planning Guidance, April 2016
- Sustainable Tourism Accommodation SPG, November 2017
- Rural Conversions to Residential or Tourism Use, November 2017

2.11 It is anticipated that the SPG topics listed above will continue to be necessary and relevant, and so will be carried forward with any amendments necessary to support the revised LDP, and/or the updated evidence base.

2.12 For example it is recognised that updated viability testing is essential to inform the revised LDP which could result in changes to existing policy, particularly affordable housing. Accordingly it is likely that the Affordable Housing SPG will need to be revised to reflect such changes. It is anticipated that this will be revised alongside the preparation of the revised LDP. It should nevertheless be noted that SPG to the LDP cannot be formally adopted until after the Inspector's Report has been received and it is clear that there are no changes to the policy approach set out in the revised plan. It is not anticipated that any new/additional SPG will be prepared or consulted on in parallel with the revised LDP, primarily due to the challenging timescales.

#### **Monitoring and Review**

2.13 The Council will monitor and regularly review progress of the replacement LDP against the requirements of the Delivery Agreement to ensure the timetable is being kept to and the public engagement as set out in the CIS is being met. As noted in paragraph 2.8 the timetable allows for a marginal degree of flexibility, however, any amendments to the DA will require approval by the Council prior to Welsh Government agreement. The DA may need to be amended if the following circumstances, which are beyond the LPA's control, occur during the preparation of the revised LDP:

- Significant change to the resources available to undertake preparation of the revised LDP.
- Preparation of the revised LDP falls behind schedule i.e. more than 3 months.
- Significant changes to European, UK or Welsh legislation directly affecting the revised LDP preparation process.
- Any other change in circumstances that will materially affect the delivery of the revised LDP in accordance with the DA.
- Significant changes to the Community Involvement Scheme.

2.14 An updated timetable will be submitted to the Welsh Government following the Deposit stage. This will provide certainty of the timescales for the remaining stages (i.e. replacing indicative stages with definitive stages). The indicative timetable will be redefined within 3 months of the close of the formal Deposit period and submitted to the Welsh Government for agreement.

## 3.0 Part 3 – Community Involvement Scheme

- 3.1 The Community Involvement Scheme sets out how the Council proposes to proactively involve the community and stakeholders in the preparation of the replacement LDP. While ultimately it is the Council that is responsible for the content of the LDP should it not be possible to achieve consensus, one of the aims of the LDP system is that plan production is based on effective community involvement in order that a range of views can be considered as part of a process of building a wide consensus on the plan's strategy and policies. The five ways of working prescribed by the Well Being of Future Generations (Wales) Act are integral to the CIS, namely long-term, integration, involvement, collaboration and prevention. The CIS describes the ways in which the community can influence the LDP at the different stages of the plan preparation process. The Council has also prepared a timetable for the production of the LDP (Section 2, Table 1 and Appendix 2), which should be read in connection with the CIS.
- 3.2 Monmouthshire County Council's key purpose is to help build sustainable and resilient communities that support the well-being of current and future generations. This is intrinsically linked to land use planning and is therefore key to the delivery of the LDP. Accordingly, the CIS is based on Monmouthshire County Council's four values; openness, fairness, flexibility and teamwork.

**Openness.** *We are open and honest. People have the chance to get involved in decisions that affect them, tell us what matters and do things for themselves/their communities. If we cannot do something to help, we'll say so; if it will take a while to get the answer we'll explain why; if we can't answer immediately we'll try to connect you to the people who can help – building trust and engagement is a key foundation.*

**Fairness.** *We provide fair chances, to help people and communities thrive. If something does not seem fair, we will listen and help explain why. We will always try to treat everyone fairly and consistently. We cannot always make everyone happy, but will commit to listening and explaining why we did what we did.*

**Flexibility.** *We will continue to change and be flexible to enable delivery of the most effective and efficient services. This means a genuine commitment to working with everyone to embrace new ways of working.*

**Teamwork.** *We will work with you and our partners to support and inspire everyone 'fixers' or problem-solvers, but we will make the best of the ideas, assets and resources available to make sure we do the things that most positively impact our people and places.*

- 3.3 Monmouthshire County Council is also committed to ensuring the ten national principles for public engagement in Wales are utilised. Public engagement in the preparation of the LDP will take place in accordance with the guidelines set out in the CIS. The Council



recognise that engagement must be designed to make a difference, the main objectives for involving the community in the LDP preparation process can be identified as:

- To involve people at the earliest opportunity, in time to shape plan preparation work
- That consultation takes place before decisions are made and that such decisions are made in an open and transparent manner
- To provide an accessible consultation process and adapt this as necessary to account for individual needs
- To encourage and enable everyone with the opportunity to be involved, if they so choose
- Adopt alternative approaches to ensure hard to reach groups are involved from the outset
- Draw on local knowledge to improve decision making and help the realistic implementation of decisions
- That the planning system should help implement the community's vision for the area
- To seek consensus and strengthen community involvement
- To engage as full a spectrum of the community as possible in strategic issues
- To provide two way dialogue by responding to comments received and publishing responses in a report of consultation

### **Welsh Language and Bilingual engagement**

3.4 The Welsh Language Standards place a legal duty on Councils to make it easier for people to use services through the medium of Welsh. The Council has published a Welsh Language Strategy for 2017 – 2022, the requirements of both the corporate strategy and Welsh Language Standards will be maintained at each stage of the revised LDP. Bilingual engagement will be carried out in the following ways:

- We welcome correspondence in both Welsh and English. Where correspondence is received in Welsh and a reply is necessary, this will be sent in Welsh.
- All consultation letters, comments forms, public notices (including site notices) and newsletters will be bilingual.
- Any pages on the Local Development Plan website and social media posts published on twitter will be bilingual.
- Any public meetings will be conducted bilingually where a request has been made ahead of time. Prior notification is required in order to provide a translation service.
- Draft LDP documents can be made available in Welsh if requested. The Adopted Revised LDP will be available in both Welsh and English format.

### **How will we involve you?**

3.5 We will seek to publicise the LDP revision process at every stage and reach as much of the community as possible, as well as other stakeholders to advise people about the revised LDP and how they can get involved. This will be done by:

- Direct contact (i.e. by letter or e-mail, the preference of which as indicated by the stakeholder through consultation)

- Through use of **Twitter**, by utilising both the corporate @MonmouthshireCC account and the @MCCPlanning account.
- Via **Facebook** on the Monmouthshire County Council page.
- Engagement with Members through specific workshops, Member drop-in sessions and in reports to appropriate Council meetings.
- Making use of existing networks such as the quarterly Community Cluster Meetings and Bryn-Y-Cwm Area Committee, utilising the five-area cluster model which provides a forum for respective Town and Community Council's to come together and liaise with the County Council.
- All LDP information and documents will be made available on the Council's website, which will be updated regularly.
- Deposit of documents at the Council's headquarters, libraries and Community Hubs.
- Press releases for the local media, where appropriate.
- Producing a regular newsletter that describes progress on the revised LDP.
- Public information exhibitions, drop in sessions and meetings in accessible and neutral locations.
- Advertising each stage of participation/consultation on **Monmouthshire Made Open**, a social network created specifically for those who believe we can build a more sustainable and resilient Monmouthshire, by working together.
- Site notices will be displayed regarding proposed land allocations at relevant stages and letters will be sent to adjacent properties (excluding Candidate Site's submitted as these relate to submissions for consideration rather than proposals)

## Who will we involve?

### Individuals who have registered an interest through the Revised LDP Database

- 3.6 A database has been maintained to include members of the public, interested persons and any individual organisations who have requested to be kept informed at each stage of the LDP revision process. The primary purpose of this database is to allow for those who are not included on the Welsh Government list of consultees for Local Development Plans to be involved and informed throughout the LDP revision process. Anyone can request for their details to be included on the database. Anyone who makes representations at any of the stages of LDP revision will be automatically added to the database in order for them to receive updates on progress and allow them to be adequately informed of further opportunities to participate at a later date. It should be noted that the General Data Protection Regulation (GDPR) is coming into force in May 2018. By commenting on the LDP, individuals and stakeholders give their consent for their details to be held by the Council throughout the LDP revision process and for a period of 6 years following adoption.
- 3.7 If you wish for your details to be added to the revised LDP database, please contact the Planning Policy Team by email, phone or in writing using the contact details as set out in paragraph 3.24.

## **County Councillors**

- 3.8 It is recognised that the involvement of Members of Monmouthshire County Council throughout the revised LDP preparation will be of key importance. Members have a unique position as not only do they represent the communities within their individual ward, they also represent public interest and are involved in decisions for the wider benefit of the County as a whole. Accordingly, Members will play an essential role in the revised LDP process by providing information to local residents, informing us of issues/opportunities within their local area and more fundamentally making decisions on matters affecting the Monmouthshire area as a whole.
- 3.9 The Cabinet Member for Enterprise has responsibility for the planning policy, including the revised LDP. Liaison with the Cabinet Member and all other Members is essential throughout the process. All Member seminars will consequently be undertaken as and when deemed necessary, particularly at key stages of the revised LDP including but not limited to; the Preferred Strategy, Deposit LDP and at Adoption. Members will be fully informed throughout the process and notified prior to every participation/consultation stage.

## **Town and Community Councils**

- 3.10 Town and Community Councils also play a key role in disseminating information to the residents within their area on matters of local importance and will be a key link to communities across Monmouthshire. Town and Community Councils will be consulted at every stage of the LDP revision process and through their individual communication methods will help raise awareness of the revised LDP to local communities. They also have the ability to provide up to date local information, opinions on any proposals within their areas and more importantly are able to provide detail of any land use based aspirations they have for their community. As noted in Section 3.5 the quarterly community cluster meetings and Bryn-Y-Cwm Area Committee will be engaged in the preparation of the revised LDP, as appropriate.

## **Partnership Groups**

- 3.11 Existing partnership groups are seen as an important means of engaging the wider community in the preparation of the revised LDP, particularly in the early stages of public participation when structured discussion is desirable.
- 3.12 Liaison with the Monmouthshire Public Service Board and partners will be of particular importance to ensure the revised LDP aligns with the Local Well-being Plan. We will also work closely with the Council's Community and Development Partnership Team who operate as a bridging mechanism between partners, Town & Community Councils and the community. The Community and Development Partnership Team is also central to the delivery of the Monmouthshire Wellbeing Plan.

## **Members of the Public, Businesses, Land Owners, Developers and Agents**

- 3.13 As outlined previously extensive engagement will be undertaken at each key stage of the LDP revision process. Efforts will be made to engage with the business community at an early

stage which could be achieved through liaison with the individual chambers' of commerce across the County. We will also engage with planning agents who are regular customers of Monmouthshire's planning service. As noted in section 3.6 anyone can request for their details to be included on the LDP revision database. Landowners, agents and prospective developers who wish to put land forward to be considered for development will therefore also be included on the LDP revision database.

- 3.14 The Candidate Site process will provide the opportunity for those who have an interest in land to submit sites to be considered for development. A common methodology is being established across the South East Wales region for local planning authorities to utilise for their respective revised LDPs. A Call for Candidate Sites will be undertaken and all candidate sites will need to be submitted via a standardised form. The form will contain the criteria required to assist in the assessment of the suitability of sites for inclusion as potential allocations in the revised LDP. A threshold for accepting candidate sites will be set in order to ensure the plan remains strategically focused. This threshold will be provided up front in order to provide clarity of the process and avoid unnecessary work being undertaken for sites that will be immediately rejected. Accordingly, all submissions must be made at the appropriate time, the dates of which will be advertised extensively using the methods set out in section 3.5.

#### **Additional Consultation Bodies**

- 3.15 Appendix 1 provides a list of the specific and general consultation bodies along with UK Government departments and other consultees. The specific consultees<sup>8</sup> comprise of the Welsh Government and those bodies with specific functions that apply to the revised Plan area, for example the Aneurin Bevan Health Board who cover the Monmouthshire area and Dŵr Cymru Welsh Water, the local water undertaker. The Authority must also consult UK Government Departments where aspects of the plan appear to affect their interests. These consultation bodies will be engaged throughout the LDP revision process at each of the formal stages and informally, as appropriate.

#### **Hard to Reach Groups**

- 3.16 Hard to reach groups and those that are seldom heard are those groups who have not taken part traditionally in the plan preparation process. Additional effort will therefore be required to ensure these groups are engaged in the revised LDP process. A flexible approach will need to be undertaken in relation to engagement with these groups, albeit within the parameters of the specified participation/consultation periods. Engagement with these groups may be achieved by using existing partnerships and groups wherever possible. It is nevertheless recognised that the very principle of a hard to reach group is that they may not be involved in existing groups and that this may not therefore always be achievable. Trusted intermediaries will also be used, as appropriate, in order to gain the views of particular groups of people who do not have the confidence to engage directly in the process.

---

<sup>8</sup> As defined in LDP Regulation 2. Full list provided in Appendix 1.

3.17 The following groups are identified as not having been sufficiently engaged in plan preparation previously and will subsequently be actively encouraged to participate in the revised LDP process:

- Young People – the established group Engage 2 Change, Monmouthshire Youth Council<sup>9</sup> will be invited to participate as appropriate in the LDP revision process. This will ensure the voices of young people are heard and enable young people to share their views on a wide range of issues that they consider important to them and their local area.
- Disabled People – engagement with the existing Access for All Forum will be of importance in order to gain the views of those living with disabilities in Monmouthshire. The forum offers an opportunity for people with disabilities to influence the policies and decisions that affect them.
- Gypsy and Travellers – the Gypsy and Traveller Accommodation Assessment Stakeholder Group will be utilised at relevant stages to ensure the gypsy and travelling community are appropriately engaged.

3.18 In addition to the above hard to reach groups there are other seldom heard voices who are considered to have been under-represented previously in LDP preparation. This includes (but is not exclusive to) those seeking affordable housing in the County, small house-builders and small and medium-sized enterprises. Accordingly, we will endeavour to reach out to these groups by utilising existing mutual points of contact wherever possible.

### **What we expect from you**

3.19 In order to ensure any comments and representations on the revised LDP are considered, they must be submitted within the prescribed timescales. The Delivery Agreement sets out the timetable of relevant stages and provides a guideline of when we will seek your involvement. This will ensure that individual views are considered and taken into account throughout the LDP revision preparation process.

3.20 It is also of importance that you notify the Planning Policy team should your contact details change during the LDP revision process in order for us to keep you fully informed of progress. With regard to Candidate Sites it is noted that land ownership changes may also occur during the process and it is imperative that these are communicated to the Planning Policy team in order to ensure progress is not delayed.

### **Building Consensus**

3.21 The Council will seek to build consensus through the various engagement and consultation methods set out within the CIS. Consensus building can only be achieved if the community and other interested parties are kept fully informed and effectively engaged throughout the preparation of the revised LDP, which will be of particular importance in the early stages of plan preparation. It is nevertheless recognised that there will be occasions where consensus cannot be achieved and a difference in opinion between certain parties occurs. A clear audit

---

<sup>9</sup> Youth Workers and pupils from King Henry VIII School, Caldicot School, Chepstow School and Monmouth School

trail of decisions will be maintained in order to ensure that there is transparency in the decision making process, and, to provide assurances to those that disagree that the decisions have been made in an informed and balanced way. However, decisions made will not be revisited via subsequent consultation opportunities, so participants are requested to focus their input on the matter being considered at that stage.

### **Late representations**

3.22 As noted in paragraph 3.17 responses are required by the specified deadline of the specific consultation period in order for them to be considered. Any late comments/representations will not be logged as 'duly made' as they were not made in accordance with the published timescales. There may be exceptional circumstances where a representation is submitted late, it will be at the Council's discretion as to whether such late representations can be accepted. Evidence will be required to highlight why the representation was delayed and that a genuine attempt was made to submit within the prescribed deadline. The timescale to produce the revised LDP is already challenging, the acceptance of late representations could result in further delay which would not be acceptable.

### **Availability of Documents**

3.23 The revised LDP documents will be made available at each of the relevant stages. All documents will be available electronically on the Planning Policy pages of the Council's website <http://www.monmouthshire.gov.uk/planning-policy> . Electronic representation forms will also be made available during periods of consultation. In addition to online availability the documents will also be available in paper copies in the following locations:

- Planning Reception, Monmouthshire County Council, County Hall, The Rhadyr, Usk, NP15 1GA
- Abergavenny Library, Baker Street, Abergavenny, NP7 5BD<sup>10</sup>
- Abergavenny Community Hub, Market Hall, Cross Street, Abergavenny, NP7 5HD<sup>11</sup>
- Caldicot Community Hub, Woodstock Way, Caldicot, NP26 5DB
- Chepstow Community Hub, Manor Way, Chepstow, NP16 5HZ
- Monmouth Community Hub, Rolls Hall, Whitecross Street, Monmouth, NP15 3BY
- Usk Community Hub, 35 Maryport Street, Usk, NP15 1AE
- Gilwern Library, Common Road, Gilwern, NP7 0DS

3.24 Paper copies of documents will not be sent out during the LDP process as they will be made publicly available in the locations listed above, as well as being made available electronically. In exceptional circumstances paper copies may be offered, however this will be assessed on a case by case basis depending on the specific needs of the relevant individual.

---

<sup>10</sup> Abergavenny Library and Community Hub are currently in separate locations, this may change during the process of the revised LDP. These details will be updated as necessary.

<sup>11</sup> See above footnote.

### Timetable and proposed Methods of Engagement

3.25 The following table sets out the detailed timetable for community engagement and the proposed engagement methods for the key stages in the LDP preparation process. The list is not exhaustive and may need to be adapted to ensure the community and stakeholders are suitably involved at each stage. The proposed methods of engagement will vary dependent on the stage of plan preparation, subject matter, preference of those involved and the resources available at the time, recognising that the proposed timetable and methods should not hinder plan preparation.

**Table 3 - Community involvement timetable and proposed methods of engagement.**

Definitive Stage: Delivery Agreement						
Summary of key steps	SA/SEA & HRA	Who will be involved	Methods of engagement	Outcome	Type of reporting required	LDP Regulations
<ul style="list-style-type: none"> <li>• Prepare timetable for the revised LDP process</li> <li>• Preparation of Community Involvement Scheme</li> <li>• Consultation on Draft DA</li> <li>• Submission of Final DA to Welsh Government following Council approval</li> </ul>	<ul style="list-style-type: none"> <li>• Provide details of integration of the SA/SEA process in the timetable</li> </ul>	<ul style="list-style-type: none"> <li>• Internal Consultees</li> <li>• Members</li> <li>• Specific consultation bodies</li> </ul>	<ul style="list-style-type: none"> <li>• Consultation with Members via Council Meeting</li> <li>• Consultation with Democratic Services Committee</li> <li>• Targeted consultation with specific consultation bodies via direct correspondence</li> <li>• Information by letter or email</li> </ul>	<ul style="list-style-type: none"> <li>• A realistic timeframe for preparation of the revised LDP</li> <li>• Details of risk management</li> <li>• Community involvement proposals specified</li> <li>• Collaborative working</li> <li>• Formal commencement of LDP revision</li> </ul>	Draft Delivery Agreement to Democratic Services Committee & Full Council - March 2018  Full Council - May 2018	The Town and Country Planning (Local Development Plan) (Wales) Regulations 9 & 10 (2004) and Regulation 2 (5) (2015)
Definitive Stage: Pre-Deposit Participation						
Summary of key steps	SA/SEA & HRA	Who will be involved	Methods of engagement	Outcome	Type of reporting required	LDP Regulations
<ul style="list-style-type: none"> <li>• Review and update existing LDP evidence base</li> </ul>	<ul style="list-style-type: none"> <li>• Sustainability Appraisal Scoping Report</li> </ul>	<ul style="list-style-type: none"> <li>• Internal Consultees</li> <li>• Members</li> </ul>	<ul style="list-style-type: none"> <li>• Drop in sessions, exhibitions and meetings as appropriate</li> </ul>	<ul style="list-style-type: none"> <li>• Awareness raising of revised LDP</li> </ul>	Full Council to report on draft Preferred	The Town and Country Planning (Local

<ul style="list-style-type: none"> <li>• Call for Candidate Sites – for a 16 week period</li> <li>• Engage with consultees to develop consensus on vision, issues and objectives.</li> <li>• Engage with consultees to develop consensus on options, including, growth levels and spatial distribution</li> <li>• Obtain Member approval on Preferred Strategy</li> </ul>	<p>Update baseline information, indicators and objectives.</p> <ul style="list-style-type: none"> <li>• Produce revised sustainability framework.</li> <li>• HRA Screening of pre-deposit proposals for likely significant effects (stage 1).</li> <li>• Prepare Health Impact Assessment.</li> </ul>	<ul style="list-style-type: none"> <li>• Specific &amp; General consultation bodies (Including Aneurin Bevan Health Board)</li> <li>• Other consultees (including Public Service Board)</li> <li>• Hard to Reach Groups</li> <li>• Town and Community Councils</li> <li>• Community Cluster Meeting Invitees</li> <li>• All others on LDP revision database</li> </ul>	<ul style="list-style-type: none"> <li>• Engage with Members through workshops and report to Council meetings</li> <li>• Publication of each participation/consultation stage on Council’s website</li> <li>• Twitter via planning policy and corporate account</li> <li>• Facebook via corporate account</li> <li>• Press Release</li> <li>• Advertise on Monmouthshire Made Open</li> <li>• Involve Engage 2 Change Group and Access for All forum</li> <li>• Information by letter or email as appropriate</li> </ul>	<ul style="list-style-type: none"> <li>• Involvement of those who do not normally participate</li> <li>• Seek consensus on vision, issues and objectives</li> <li>• Collaborative working</li> <li>• Seek consensus on options, including, growth levels and distribution</li> <li>• Receipt of Candidate Sites</li> <li>• Draft SA/SEA Scoping Report</li> <li>• Draft Preferred Strategy</li> </ul>	<p>Strategy – November 2019</p> <p>Log details of involvement for inclusion within Report of Consultation.</p>	<p>Development Plan) (Wales) Regulation 14 (2004) and Regulation 2 (10) (2015)</p>
<p><b>Definitive Stage: Pre-Deposit Consultation - Preferred Strategy and Initial Sustainability Appraisal Report (ISAR)</b></p>						
<p><b>Summary of key steps</b></p>	<p><b>SA/SEA &amp; HRA</b></p>	<p><b>Who will be involved</b></p>	<p><b>Methods of engagement</b></p>	<p><b>Outcome</b></p>	<p><b>Type of reporting required</b></p>	<p><b>LDP Regulations</b></p>
<ul style="list-style-type: none"> <li>• Formal consultation on Preferred Strategy</li> </ul>	<ul style="list-style-type: none"> <li>• Formal consultation on ISAR</li> </ul>	<ul style="list-style-type: none"> <li>• Internal Consultees</li> <li>• Members</li> </ul>	<ul style="list-style-type: none"> <li>• Engage with Members through workshops and</li> </ul>	<ul style="list-style-type: none"> <li>• Preferred Strategy</li> <li>• Initial Sustainability Appraisal Report</li> </ul>	<p>Full Council to report on draft Deposit Plan – October 2020</p>	<p>The Town and Country Planning (Local</p>



<ul style="list-style-type: none"> <li>• Formal consultation on ISAR</li> <li>• Publication of Candidate Sites Register</li> <li>• Preparation of Initial Report of Consultation providing feedback and comments on representations received.</li> <li>• Preparation of Deposit LDP</li> <li>• Obtain Member approval on Deposit LDP</li> </ul>	<ul style="list-style-type: none"> <li>• HRA of Deposit Plan. Revisit HRA Screening to determine whether the policies and proposals have potential to lead to likely significant effects, beyond those considered in Stage 1 screening.</li> </ul>	<ul style="list-style-type: none"> <li>• Specific &amp; General consultation bodies</li> <li>• Other consultees</li> <li>• Hard to Reach Groups</li> <li>• Town and Community Councils</li> <li>• Community Cluster Meeting Invitees</li> <li>• All others on LDP revision database</li> </ul>	<p>report to Council meetings</p> <ul style="list-style-type: none"> <li>• Drop in sessions, exhibitions and meetings as appropriate</li> <li>• Publication of each consultation stage on Council's website</li> <li>• Twitter via planning policy and corporate account</li> <li>• Facebook via corporate account</li> <li>• Press Release</li> <li>• Advertise on Monmouthshire Made Open</li> <li>• Involve Engage 2 Change Group &amp; Access for All forum</li> <li>• Information by letter or email as appropriate</li> </ul>	<ul style="list-style-type: none"> <li>• Candidate Site Register</li> <li>• Draft Deposit Plan</li> </ul>	<p>Details of responses received to be incorporated into Report of Consultation.</p>	<p>Development Plan) (Wales) Regulations 15 &amp; 16 (2004) and Regulation 16a (2015)</p>
<b>Definitive Stage: Deposit Consultation - Deposit Plan, Sustainability Appraisal Report (SAR) and Habitats Regulations Assessment (HRA)</b>						
<b>Summary of key steps</b>	<b>SA/SEA &amp; HRA</b>	<b>Who will be involved</b>	<b>Methods of engagement</b>	<b>Outcome</b>	<b>Type of reporting required</b>	<b>LDP Regulations</b>
<ul style="list-style-type: none"> <li>• Deposit of LDP for public inspection</li> <li>• Formal consultation on Deposit LDP, SAR, HRA</li> </ul>	<ul style="list-style-type: none"> <li>• Formal consultation on SAR (incorporating</li> </ul>	<ul style="list-style-type: none"> <li>• Internal Consultees</li> <li>• Members</li> <li>• Specific &amp; General</li> </ul>	<ul style="list-style-type: none"> <li>• Engage with Members through workshops and report to Council meetings</li> </ul>	<ul style="list-style-type: none"> <li>• Deposit Plan</li> <li>• Final Sustainability Appraisal Report</li> <li>• Habitats Regulations Assessment</li> </ul>	<p>Details of responses received to be incorporated into</p>	<p>The Town and Country Planning (Local Development</p>

<p>and any relevant supporting documents</p> <ul style="list-style-type: none"> <li>• Preparation of Report of Consultation providing feedback and comments on representations received</li> </ul>	<p>Health Impact Assessment)</p> <ul style="list-style-type: none"> <li>• Formal consultation on HRA</li> </ul>	<p>consultation bodies</p> <ul style="list-style-type: none"> <li>• Other consultees</li> <li>• Hard to Reach Groups</li> <li>• Town and Community Councils</li> <li>• Community Cluster Meeting Invitees</li> <li>• All others on LDP revision database</li> </ul>	<ul style="list-style-type: none"> <li>• Drop in sessions, exhibitions and meetings as appropriate</li> <li>• Publication of each consultation stage on Council's website</li> <li>• Twitter via planning policy and corporate account</li> <li>• Facebook via corporate account</li> <li>• Press Release</li> <li>• Advertise on Monmouthshire Made Open</li> <li>• Update Engage 2 Change Group &amp; Access for All group</li> <li>• Information by letter or email as appropriate</li> </ul>	<ul style="list-style-type: none"> <li>• Representations and comments on Deposit Plan, SA/SEA, HRA to be included in Report of Consultation</li> </ul>	<p>Report of Consultation.</p>	<p>Plan) (Wales) Regulations 17, 18 &amp; 19 (2004)</p>
<b>Indicative Stage: Submission of LDP to Welsh Government</b>						
Summary of key steps	SA/SEA & HRA	Who will be involved	Methods of engagement	Outcome	Type of reporting required	LDP Regulations
<ul style="list-style-type: none"> <li>• Consider any representations made on deposit proposals and update Deposit Plan &amp; Report of Consultation accordingly</li> </ul>	<ul style="list-style-type: none"> <li>• Consider any implications of representations on SAR &amp; HRA</li> <li>• Submit SAR</li> </ul>	<ul style="list-style-type: none"> <li>• Members</li> <li>• Internal Consultees</li> <li>• Specific &amp; General consultation bodies</li> </ul>	<ul style="list-style-type: none"> <li>• Notify Members via email</li> <li>• Publication on Council's website</li> <li>• Twitter via planning policy and corporate account</li> </ul>	<ul style="list-style-type: none"> <li>• Submission of Deposit LDP and supporting documents to Welsh Government for formal examination</li> </ul>	<p>Full Council to report on responses received on Deposit Plan, any Focused Changes and to seek</p>	<p>The Town and Country Planning (Local Development Plan) (Wales) Regulation 22</p>

<ul style="list-style-type: none"> <li>• Potential Focused Changes consultation</li> <li>• Submit Deposit LDP, Report of Consultation, Sustainability Appraisal Report (SAR), Community Involvement Scheme and any relevant supporting documents (including the evidence base) to the Welsh Government and Planning Inspectorate</li> </ul>	<ul style="list-style-type: none"> <li>• Submit iterative HRA</li> </ul>	<ul style="list-style-type: none"> <li>• Other consultees</li> <li>• Town and Community Councils</li> <li>• Community Cluster Meeting Invitees</li> <li>• All others on LDP database</li> </ul>	<ul style="list-style-type: none"> <li>• Facebook via corporate account</li> <li>• Press Release</li> <li>• Information by letter or email as appropriate</li> <li>• Provide copies of documents in the following locations: County Hall, Libraries and Community Hubs</li> </ul>		<p>endorsement for submission – May 2021</p>	<p>(2004) and Regulation 2 (17) (2015)</p>
<b>Indicative Stage: Independent Examination</b>						
<b>Summary of key steps</b>	<b>SA/SEA &amp; HRA</b>	<b>Who will be involved</b>	<b>Methods of engagement</b>	<b>Outcome</b>	<b>Type of reporting required</b>	<b>LDP Regulations</b>
<ul style="list-style-type: none"> <li>• Publish details of Hearing Sessions and notify all interested parties specifying dates and location</li> <li>• Seek common ground with objectors to focus hearing sessions</li> <li>• Update Matters Arising Changes (MACs) as appropriate</li> <li>• Consult on Matters Arising Changes</li> </ul>	<ul style="list-style-type: none"> <li>• Appraise any MACs utilising the SA/SEA as appropriate</li> <li>• Appraise any MACs utilising the HRA as appropriate</li> </ul>	<ul style="list-style-type: none"> <li>• Members</li> <li>• Internal Consultees</li> <li>• Specific &amp; General consultation bodies</li> <li>• Other consultees</li> <li>• Town and Community Councils</li> <li>• Community Cluster</li> </ul>	<ul style="list-style-type: none"> <li>• Notify Members via email</li> <li>• Publication on Council’s website</li> <li>• Twitter via planning policy and corporate account</li> <li>• Facebook via corporate account</li> <li>• Press Release</li> <li>• Information by letter or email as appropriate</li> </ul>	<ul style="list-style-type: none"> <li>• Ensure examination is open to all who wish to observe</li> </ul>	<p>Statements of common ground, as necessary</p>	<p>The Town and Country Planning (Local Development Plan) (Wales) Regulation 23 (2004)</p>

		<p>Meeting Invitees</p> <ul style="list-style-type: none"> <li>• All others on LDP database</li> </ul>				
<b>Indicative Stage: Inspector's Report</b>						
<b>Summary of key steps</b>	<b>SA/SEA &amp; HRA</b>	<b>Who will be involved</b>	<b>Methods of engagement</b>	<b>Outcome</b>	<b>Type of reporting required</b>	<b>LDP Regulations</b>
<ul style="list-style-type: none"> <li>• Publish Inspector's Report following receipt (within prescribed 8 week period)</li> <li>• Inform interested parties of receipt and publication of Inspector's Report</li> </ul>		<ul style="list-style-type: none"> <li>• Members</li> <li>• Internal Consultees</li> <li>• Specific &amp; General consultation bodies</li> <li>• Other consultees</li> <li>• Town and Community Councils</li> <li>• Community Cluster Meeting Invitees</li> <li>• All others on LDP database</li> </ul>	<ul style="list-style-type: none"> <li>• Notify Members via email</li> <li>• Publication on Council's website</li> <li>• Twitter via planning policy and corporate account</li> <li>• Facebook via corporate account</li> <li>• Press Release</li> <li>• Information by letter or email as appropriate</li> <li>• Provide copy of Inspectors Report in the following locations: County Hall, Libraries and Community Hubs</li> </ul>	<ul style="list-style-type: none"> <li>• Binding Inspector's Report</li> </ul>	None	The Town and Country Planning (Local Development Plan) (Wales) Regulation 24 (2004)

Indicative Stage: Adoption						
Summary of key steps	SA/SEA & HRA	Who will be involved	Methods of engagement	Outcome	Type of reporting required	LDP Regulations
<ul style="list-style-type: none"> <li>• Obtain Member approval to formally adopt</li> <li>• Inform all on LDP database of adoption of the revised LDP</li> <li>• Produce adoption statement</li> <li>• Produce the adopted LDP bilingually</li> </ul>	<ul style="list-style-type: none"> <li>• Publish SA Report</li> <li>• Publish HRA Report</li> </ul>	<ul style="list-style-type: none"> <li>• Members</li> <li>• Internal Consultees</li> <li>• Specific &amp; General consultation bodies</li> <li>• Other consultees</li> <li>• Town and Community Councils</li> <li>• Community Cluster Meeting Invitees</li> <li>• All others on LDP database</li> </ul>	<ul style="list-style-type: none"> <li>• Engage with Members via an all Member Workshop and Council Meeting</li> <li>• Once adopted publication on Council's website</li> <li>• Once adopted, notification via Twitter utilising planning policy and corporate account</li> <li>• Once adopted, notification via Facebook utilising corporate account</li> <li>• Once adopted, Press Release will be published</li> <li>• Once adopted, notification via letter or email</li> <li>• Once adopted, provide copy of Adopted LDP in the following locations: County Hall, Libraries and Community Hubs</li> </ul>	<ul style="list-style-type: none"> <li>• Formal adoption of the revised LDP</li> </ul>	Full Council prior to formal Adoption – Early 2022	The Town and Country Planning (Local Development Plan) (Wales) Regulation 25 (2004) and 2(19) (2015)

## Contact details

3.26 You can contact the planning policy team using any of the following methods:

Email: [planningpolicy@monmouthshire.gov.uk](mailto:planningpolicy@monmouthshire.gov.uk)

Telephone: 01633 644429

Post:

Planning Policy

Monmouthshire County Council

County Hall

The Rhadyr

Usk

NP15 1GA

## Appendix 1 – List of Consultation Bodies

The Council will consult the following specific consultation bodies at all stages in the preparation of the LDP.

### Specific Consultation Bodies<sup>12</sup> (including UK Government Departments):

- Welsh Government (Planning division will co-ordinate consultations)
- Natural Resources Wales
- Network Rail
- Office of Secretary of State for Wales
- Telecommunication Operators - EE, Vodaphone and O2, Openreach, Virgin Media
- Aneurin Bevan Health Board
- Gas and Electricity Licencees - National Grid, Wales & West Utilities
- Sewerage and Water undertakers – Dwr Cymru Welsh Water
- Department for Transport (including Secretary of State for functions previously exercised by the Strategic Rail Authority)
- UK Government Departments- Department of Business, Energy and Industrial Strategy
- Home Office
- Ministry of Defence

Neighbouring local authorities:

- Blaenau Gwent County Borough Council
- Brecon Beacons National Park Authority
- Bristol City Council
- Cardiff Capital Region Strategic Planning Panel<sup>13</sup>
- Forest of Dean District Council
- Gloucestershire County Council
- Herefordshire County Council
- Newport City Council
- Powys County Council
- South Gloucestershire Council
- Torfaen County Borough Council
- West of England Joint Spatial Plan

Town and Community Councils in the Monmouthshire area:

- Abergavenny Town Council
- Caerwent Community Council
- Caldicot Town Council
- Chepstow Town Council
- Crucorney Community Council
- Devauden Community Council
- Goetre Fawr Community Council
- Grosmont Community Council
- Gwehelog Fawr Community Council

---

<sup>12</sup> As defined in LDP Regulation 2.

<sup>13</sup> Once established.

- Llanarth Fawr Community Council
- Llanbadoc Community Council
- Llanelly Community Council
- Llanfoist Fawr Community Council
- Llangattock Vibon Avel Community Council
- Llangwm & Llansoy Community Council
- Llangybi Fawr Community Council
- Llanhennock Community Council
- Llanover Community Council
- Llantilio Crossenny Community Council
- Llantilio Pertholey Community Council
- Llantrisant Community Council
- Magor with Undy Community Council
- Mathern Community Council
- Mitchel Troy United Community Council
- Monmouth Town Council
- Portskewett Community Council
- Raglan Community Council
- Rogiet Community Council
- Shirenewton Community Council
- St Arvans Community Council
- Tintern Community Council
- Trellech United Community Council
- Usk Town Council

### **General Consultation Bodies**

The Council will consult the following general consultation bodies, where appropriate, in accordance with this Delivery Agreement. This list is not exhaustive and may be added to as appropriate:

(i) Voluntary bodies whose activities benefit any part of the authority's area:

- Age Concern Gwent
- CAIR (The Monmouthshire Disablement Association)
- Gwent Association for the Blind
- Gwent Association of Voluntary Organisations Monmouthshire (GAVO)
- Gwent Wildlife Trust
- Royal Voluntary Service (RVS)
- Rural Community Action Monmouthshire

(ii) Bodies representing the interests of different racial, ethnic or national groups in the authority's area:

- All Wales Ethnic Minority Association
- Citizen's Advice Cymru
- Ethnic Minority Foundation
- Friends, Families and Travellers



- South East Wales Racial Equality Council (SEWREC)

(iii) Bodies which represent the interests of different religious groups in the authority's area.

- The Representative Body of the Church in Wales

(iv) Bodies which represent the interests of disabled persons in the authority's area.

- Downs Syndrome Association
- Gwent Association for the Blind
- Mencap Cymru
- Mind Cymru
- Royal National Institute for Deaf People
- Wales Council for Deaf People
- Wales Council for the Blind
- Wales Council for the Disabled

(v) Bodies which represent the interests of persons carrying on business in the authority's area.

- Abergavenny Community Enterprise
- British Wind Energy Association
- Confederation of British Industry (Wales)
- Homemakers Community Recycling
- Newport and Gwent Enterprise Agency
- South East Wales Energy Agency
- Viridor Waste Management

(vi) Bodies which represent the interests of Welsh culture in the authority's area.

- Cadw
- Glamorgan Gwent Archaeological Trust Ltd
- Royal Commission on Ancient and Historic Monuments

### **Other Consultees**

The Council will consult the following other consultees, where appropriate, in accordance with the Delivery Agreement. This list is not exhaustive and may be added to as appropriate:

- Abergavenny Local Historic Society
- Arriva Trains Wales
- British Aggregates Association
- British Geological Survey
- British Waterways
- Bryn Y Cwm Community Forum
- Business Wales (South Wales Regional Centre)
- Campaign for Real Ale (Camra)
- Campaign for the Protection of Rural Wales (CPRW)
- Capital Region Tourism (Monmouth)

- Centre for Ecology & Hydrology
- Chambers of Trade & Commerce – Abergavenny, Caldicot, Chepstow, Monmouth and Usk
- Charter Housing Association
- Chartered Institute of Housing (Cymru)
- Chartered Institution of Waste Management Wales
- Chepstow Business Club
- Civic Societies – Abergavenny & District, Monmouth and Usk
- Community Land Advisory Service Cymru (CLAS)
- Country Landowners and Business Association Cymru (CLA)
- Crown Estate
- Department for the Economy and Transport
- Design Commission for Wales
- Disability Rights Commission Wales
- Disability Wales
- Disabled Persons Transport Advisory Committee
- Energy Savings Trust Wales
- Farmers Union of Wales (FUW)
- Federation of Master Builders
- Federation of Small Businesses in Wales
- Fields in Trust
- Forestry Commission Wales
- Freight Transport Association
- Friends of the Earth – Abergavenny & Crickhowell and Chepstow
- Gwent Badger Group
- Gwent Joint Passenger Transport Unit
- Gwent Police
- Gwent Young Farmers Clubs
- Health and Safety Executive (Wales)
- Home Builders Federation
- Institute of Directors Wales
- Institution of Civil Engineers Wales
- Joint Council for Wales
- Llanarth Estate
- Llanellen Parish Association
- Llangybi Estate
- Llanover and Coldbrook Estate
- Local Assembly Member
- Magor with Undy Sports and Leisure Association
- Mineral Products Association
- Monmouth Archaeological Society
- Monmouth, Brecon and Abergavenny Canals Trust
- Monmouthshire Bat Group
- Monmouthshire Green Web

- Monmouthshire Local Policing Unit
- National Air Traffic Services
- National Farmers Union Cymru (NFU)
- National Trust
- One Voice Wales
- Open Spaces Society
- Planning Aid Wales
- Pontypool Park Estate Office
- Public Health Wales
- Rail Freight Group
- Ramblers Cymru
- Redwick Community Council
- RSPB Cymru
- Rural Housing Enabler
- Shelter Cymru
- Shirenewton and Mynyddbach Fields Association Ltd
- Society for the Protection of Ancient Buildings
- South Wales Fire and Rescue Service
- Sports Council for Wales
- Sustrans Cymru
- The Canal and River Trust
- The Chepstow Society
- The Coal Authority
- The Gypsy Council
- The National Library of Wales
- The Open Spaces Society
- The Planning Inspectorate
- The Theatres Trust
- Transition Chepstow
- Traveller Law Reform Project
- Wales Council for Voluntary Action (WCVA)
- WEA Cymru (Adult Learning Wales)
- Wales Environment Link
- Welsh Environmental Services Association
- Welsh Health Estates
- Welsh Historic Gardens Trust
- Welsh Language Commissioner
- Woodland Trust Wales (Coed Cadw)
- Wye Valley AONB
- Wye Valley Society

**Appendix 2 - Timetable for Revision of the LDP**

	2018					2019					2020					2021					2022																											
<b>Key Stage - Definitive</b>	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D
<b>Delivery Agreement (DA)</b>																																																
Preparation of Draft DA																																																
Political Reporting - draft DA																																																
Targeted Consultation on draft DA																																																
Political Reporting following consultation on DA (agreement to submit to WG)																																																
Submission to Welsh Government																																																
DA agreed by Welsh Government																																																
<b>Update Evidence Base</b>																																																
Review Evidence Base																																																
SA: Review/Update SA baseline and SA framework																																																
<b>Pre-Deposit Participation</b>																																																
Call for Candidate Sites																																																
Candidate Sites - Stage 1 Assessment																																																

	2018					2019					2020					2021					2022																																							
Key Stage - Definitive	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D
Consultation on Draft SA Scoping Report																																																												
Identification & assessment of vision, issues and objectives																																																												
Identification and assessment of options (growth levels and spatial distribution)																																																												
Consultation on Options (non-statutory)																																																												
Candidate Sites - Stage 2a Assessment																																																												
Preparation of Preferred Strategy, SA Report & HRA																																																												
Preferred Strategy Political Reporting																																																												
<b>Pre-Deposit Consultation</b>																																																												
Consultation on Preferred Strategy																																																												
Consultation on Initial SA Report																																																												
Analyse consultation responses and prepare Initial Consultation Report																																																												
Candidate Sites - Stage 2b Assessment																																																												
Candidate Sites - Stage 3 Assessment																																																												

	2018					2019					2020					2021					2022																																											
<b>Key Stage - Definitive</b>	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D				
Prepare Deposit Plan, update SA /HRA																																																																
Deposit Plan Political Reporting																																																																
<b>Statutory Deposit</b>																																																																
Consultation on Deposit Plan, SA Report & HRA																																																																
Analyse consultation responses and prepare Consultation Report																																																																
<b>Key Stage - Indicative</b>	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D				
Submission of LDP to Welsh Government																																																																
Examination																																																																
Inspector's Report - Preparation																																																																
Inspector's Report - Publication																																																																
Adoption																																																																

### Appendix 3 – Risk Assessment

Issue	Potential Risk(s)	Mitigation	Probability and Impact
No Plan coverage after expiry of current LDP in December 2021.	A gap in Plan coverage from 1 <sup>st</sup> January 2022 until Plan adoption in early February/ March 2022.	<p>The LDP must be adopted within 8 weeks of receiving the Inspector’s binding report. The LDP cannot therefore be delayed any further and will be adopted early 2022.</p> <p>Any risk exposure during the 8-12 week period at the beginning of 2022 is considered to be manageable. Any planning appeals not determined before 31<sup>st</sup> December 2021 would unlikely be determined before the new LDP is adopted, due to prematurity.</p>	High Likelihood
			Low Impact
Change in staff resources available to undertake revised LDP preparation.	Programme slippage.	Consider additional resources (including support from other sections within the Council) and ensure robust structure.	Medium Likelihood
			Medium Impact
Staff turnover in small team.	Programme slippage.	Ensure revised LDP process maintains highest level corporate priority.	Low Likelihood
			Medium Impact
Reduction and lack of financial resources.	Programme slippage. Delay in securing information required to progress plan.	Ensure plan preparation process is adequately costed with in-built capacity for unforeseen costs.	Medium Likelihood
			Medium Impact
Council decision making structure/ political reporting cycle.	Programme slippage.	Streamline decision-making procedures and ensure timetable is realistic.	Medium Likelihood
			Medium Impact

Issue	Potential Risk(s)	Mitigation	Probability and Impact
Political Change/ Elections.	Programme slippage.	Early Member training.	Low Likelihood
			Medium Impact
Lack of consensus throughout the organisation and/ or lack of support from officers/other departments in production of the evidence base.	Programme slippage.	Ensure organisation wide support of plan process and timetable from outset.	Low Likelihood
			Medium Impact
Challenging timetable to prepare revised LDP within 3 years due to greater than anticipated workload (e.g. greater number of representations received or SA/SEA/HRA requirements).	Programme slippage.	Realistic timetabling for each stage of plan preparation, adequate resources and careful project management with adequate contingencies/flexibility. If appropriate reconsider timetable and resources.	Medium Likelihood
			High Impact
<b>National Issues</b>			
Additional requirements arising from the issue of new legislation and/or national guidance. e.g. alignment with	Programme slippage.	Monitor emerging legislation/guidance; report and respond early to changes as necessary.	High Likelihood
			High Impact



Issue	Potential Risk(s)	Mitigation	Probability and Impact
revised Planning Policy Wales and LDP Manual.			
Involvement in preparation of Strategic Development Plan (SDP)	Programme slippage. Resource implications, extent of input to the SDP currently unknown.	Ensure sufficient resources are available and corporate support of SDP process and timetable from outset.	Medium Likelihood
			Medium Impact
Direction from Welsh Government Cabinet Secretary to prepare a Joint Plan.	Work on individual LDP to date would be abortive.	Cannot be mitigated, full justification of the Council's approach to produce an individual Monmouthshire LDP has been provided.	Medium Likelihood
			High Impact
Ability of statutory consultees and/or Planning Inspectorate to respond within set timescales.	Programme slippage. Key milestones are not met.  Examination and/or Receipt of Inspectors Report delayed.	Maintain close liaison with statutory consultees and the Planning Inspectorate to ensure early identification of potential problems.	Low Likelihood
			Medium Impact
<b>Local Issues</b>			
Insufficient information to undertake SA/SEA.	Programme slippage.	Identify expectations of consultation bodies.  Consider additional resources.	Medium Likelihood
			Medium Impact
Large volume and /or highly significant levels of objection to	Programme slippage. Plan cannot be submitted for examination without	Ensure close liaison and early/continued involvement of the community, statutory bodies & stakeholders throughout the plan preparation process.	Medium Likelihood
			Medium Impact

Issue	Potential Risk(s)	Mitigation	Probability and Impact
proposals e.g. site allocations.	significant work.		
Review of revised Plan resulting from a requirement to align with a Strategic Development Plan.	Programme slippage.	Ensure involvement in progress of regional work. Early response to potential local implications.	Low Likelihood
			Low Impact
Plan fails the test of 'soundness'.	Programme slippage. Part of the Plan is excluded or changed. Additional work needs to be carried out before the Plan can be adopted. The plan could be withdrawn.	Ensure LDP has a robust evidence base, properly subjected to SA/SEA/HRA, with well audited community and stakeholder engagement.  Maintain liaison with Welsh Government on preparation procedures.	Low Likelihood
			High Impact
Legal Challenge.	Programme slippage. Adopted Plan quashed in whole or part. Additional work/time/financial requirements.	Good knowledge of statutory requirements to ensure compliance.	Low Likelihood
			Medium Impact

## Appendix 4 – Glossary of terms

<b>Adopted Plan</b>	The final version of the Local Development Plan.
<b>Adoption</b>	The final stage of Local Development Plan preparation where the LDP becomes the statutory development plan for the area it covers.
<b>Annual Monitoring Report (AMR)</b>	A yearly report to monitor the effectiveness of the LDP and ultimately determines whether any revisions to the Plan are necessary. It assesses the extent to which the LDP strategy and objectives are being achieved and whether the LDP policies are functioning effectively.
<b>Baseline</b>	A description of the present state of an area.
<b>Candidate Site</b>	A site nominated by an individual with an interest in land (i.e. landowner, developer, agent or member of the public) to be considered for inclusion in the LDP. All Candidate Sites will be assessed for suitability for inclusion as potential allocations.
<b>Community</b>	People living in a defined geographical area, or who share other interests and therefore form communities of interest.
<b>Community Involvement Scheme (CIS)</b>	The Community Involvement Scheme forms part of the Delivery Agreement. It outlines the principles of engagement and provides detail on how the Local Planning Authority will involve communities and stakeholders (including businesses and developers) in the preparation of the Local Development Plan.
<b>Consensus Building</b>	A process of dialogue with the community and other interested parties to understand relevant viewpoints and to seek agreement where possible.
<b>Consultation</b>	A formal process in which comments are invited on a particular topic or draft document usually within a defined time period.
<b>Council</b>	Monmouthshire County Council (excluding for planning purposes the Brecon Beacons National Park administrative area that falls within Monmouthshire).
<b>Delivery Agreement (DA)</b>	A document comprising the local planning authority's timetable for the preparation of a Local Development Plan, together with its Community Involvement Scheme, submitted to the Welsh Government for agreement.
<b>Deposit</b>	A formal six week stage in which individuals and organisations can make representations on the Local Development Plan. Representations that relate to whether the plan is 'sound' can then be examined by an Inspector.
<b>Deposit Plan</b>	This is a full draft of the LDP which undergoes a formal consultation period prior to it being submitted to the Welsh Government for public examination.
<b>Duly Made</b>	Representations to the development plan which are made in the correct manner and within the specified consultation time period.
<b>Engagement</b>	A proactive process that seeks to encourage the involvement and participation of the community and other groups in the decision making process.
<b>Evidence Base</b>	Information and data that provides the basis for the preparation of the LDP vision, objectives, policies and proposals and justifies the soundness of the policy approach of the LDP.
<b>Examination</b>	The examination involves public examination of the Deposit LDP, the Deposit representations, the report of consultation, evidence base/background documents and the Sustainability Appraisal Report. This is carried out by the Planning Inspectorate on behalf of the Welsh Government.
<b>Habitat Regulations</b>	Habitats Regulations Assessment (HRA) relates to the assessment of the impacts of a plan (or project) against the nature conservation objectives of

<b>Assessment (HRA)</b>	European designated sites for any likely significant effects. HRA also ascertains whether the proposed plan would adversely affect the integrity of the site.
<b>Indicator</b>	A measure of variables over time, often used to measure progress in the achievement of objectives, targets and policies.
<b>Inspector's Report</b>	The Report prepared by an independent Inspector who examines the LDP. The Inspector's Report contains recommendations on the content of the final LDP and is binding upon the Council. The Council must adopt the LDP in the manner directed by the Inspector.
<b>Involvement</b>	Generic term relating to community involvement that includes both participation and consultation techniques.
<b>Local Development Plan (LDP)</b>	A land use plan which includes a vision, strategy, area wide policies for development types, land allocations, and policies and proposals for key areas of change and protection. Allocations and certain policies are shown geographically on the Proposals Map forming part of the Plan. The LDP is a statutory development plan that each local planning authority area is required to produce in Wales.
<b>Local Planning Authority (LPA)</b>	In the case of Monmouthshire, this is Monmouthshire County Council (excluding the Brecon Beacons National Park administrative area where the local planning authority is the National Park).
<b>Monmouthshire County Council (MCC)</b>	This is the name of the Local Planning Authority preparing the LDP.
<b>Objective</b>	A statement of what is intended, specifying the desired direction of change in trends.
<b>Participation</b>	A process rather than a single event that provides opportunity for direct engagement with the community and stakeholders to input into decision making.
<b>Partners</b>	Other local authority departments and statutory bodies where the LDP will help to deliver some of the objectives of their strategies. Partners may be expected to contribute in the formulation of relevant parts of the plan.
<b>Planning Inspectorate</b>	The Wales branch of the Planning Inspectorate are an independent body who will be responsible for the formal examination of the LDP.
<b>Planning Policy Wales (PPW)</b>	Planning policy guidance for Wales produced by the Welsh Government is set out in this document
<b>Pre-Deposit</b>	Stages of preparation and consultation of the LDP before the Deposit Plan is finalised and approved by the Council.
<b>Preferred Strategy</b>	This sets out the broad strategic direction for the LDP. This includes the preferred level of growth along with the spatial strategy for distributing the growth. It also includes the vision, issues and objectives of the plan.
<b>Press Releases</b>	Sent to Welsh media, including newspapers, radio and television news stations as appropriate. Media may choose not to print or broadcast an item.
<b>Regulation</b>	Regulations are set out in Welsh Statutory Instruments. They provide the framework for the preparation of the LDP.
<b>Report of Consultation</b>	A Consultation Report is one of the documents required to be submitted for independent examination. An initial consultation report is also required for the pre-deposit stage.

<b>Representations</b>	Comments received in relation to the LDP, either in support of, or in opposition to.
<b>Review Report</b>	The Review Report provides an overview of the issues that have been considered as part of the full review process and identifies changes that are likely to be needed to the LDP, based on evidence. It also sets out the type of revision procedure to be followed in revising the LDP.
<b>Scoping</b>	The process of deciding the scope and level of detail of a sustainability appraisal (SA), including the sustainability effects and options which need to be considered, the assessment methods to be used and the structure and contents of the SA Report.
<b>Soundness Tests</b>	In order to adopt a LDP it must be determined to be 'sound' by the Planning Inspector. The Tests of Soundness are set out in PPW. There are three tests to make that judgement in relation to the plan as a whole. A framework for assessing the soundness of LDPs has been developed by the Planning Inspectorate.
<b>Stakeholders</b>	People whose interests are directly affected by a LDP (and/ or Sustainability Appraisal/ Strategic Environmental Assessment) and whose involvement is generally through representative bodies.
<b>Strategic Environmental Assessment (SEA)</b>	Generic term used internationally to describe environmental assessment as applied to policies, plans and programmes. The European Strategic Environmental Assessment Directive (2001/42/EC) requires a formal "environmental assessment of certain plans and programmes, including those in the field of planning and land use".
<b>Strategic Development Plan (SDP)</b>	A Strategic Development Plan is a tool for regional planning to cover cross-boundary issues such as housing and transport. It will be prepared by a Strategic Planning Panel across a region. LPA's must have regard to the SDP when developing their LDPs.
<b>Submission</b>	When the LDP, SAR and HRA are formally submitted to the Welsh Government for independent examination by a Welsh Government appointed Inspector.
<b>Supplementary Planning Guidance (SPG)</b>	Provide more detailed or site specific guidance on the application of LDP Policies. They provide supplementary information in respect of the policies in a LDP. SPG does not form part of the LDP and is not subject to independent examination.
<b>Sustainability Appraisal (SA)</b>	Tool for appraising policies, including LDPs, to ensure they reflect sustainable development objectives (i.e. social, environmental and economic factors). Each LPA is required by Section 62(6) of the Act to undertake SA of their Local Development Plan. This form of sustainability appraisal fully incorporates the requirements of the Strategic Environmental Assessment Directive.
<b>Sustainability Appraisal Report (SAR)</b>	A document required to be produced as part of the Sustainability Appraisal process to describe and appraise the likely significant effects on sustainability of implementing a LDP, which meets the requirements for the Environmental Report under the SEA Directive. Section 62(6) of the Act requires each LPA to prepare a report of the findings of the SA of the LDP. It is an integral part of the development plan making process.
<b>Timetable</b>	Sets out the dates by which key stages and processes of LDP preparation are expected to be completed. These are definitive for stages up to the deposit of the LDP and indicative for the remaining stages after.

<b>Well-being of Future Generations (Wales) Act (2015)</b>	The Well-being of Future Generations (Wales) Act 2015 is legislation that requires public bodies, such as local authorities, to put long term sustainability at the forefront of their thinking to make a difference to lives of people in Wales. Local authorities must work towards the seven well-being goals and enact the five ways of working set out in the Act.
<b>Workshop</b>	Where members of the public have the opportunity to engage in group debates and practical exercises with a written or drawn 'output'.



## Future Generations Evaluation (includes Equalities and Sustainability Impact Assessments)

**Name of the Officer** completing the evaluation  
Mark Hand

**Phone no:** 01633 644803

**E-mail:** markhand@monmouthshire.gov.uk

**Please give a brief description of the aims of the proposal**

To ensure that LDPs are kept up-to-date, local planning authorities are required to commence a full review of their plans at least once every four years following plan adoption, or sooner if the findings of AMRs indicate significant concerns with a plan's implementation. The latest Monmouthshire AMRs evidence a need for an early review of the LDP as a result of the need to address the shortfall in the housing land supply and to facilitate the identification and allocation of additional housing land. A full review of the LDP commenced in 2017 and culminated with the publication of a draft Review Report. The draft Review Report was subject to public consultation and has been updated to incorporate consultation responses as appropriate. The final Review Report provides an overview of the issues that have been considered as part of the full review process and subsequently identifies the changes that are likely to be needed to the LDP, and why, based on evidence. The Review Report concludes by recommending that the LDP should be revised following the full revision procedure.

Preparation of a Delivery Agreement (DA) is a key requirement in preparing a revised plan. The DA provides details of the various stages involved in the Plan-making process and the time each part of the process is likely to take, as well as the resources that the Council will commit to Plan preparation. It also sets out the way in which the Council proposes to involve the local community and other stakeholders in the preparation of the revised LDP. The DA is split into

	<p>two key parts: the Timetable for producing the revised LDP and the Community Involvement Scheme.</p> <p>Since the current LDP was adopted, the Planning (Wales) Act 2015 introduced additional tiers of statutory Development Plans. This includes Strategic Development Plans (SDP), an optional tier of Plan intended to provide an effective cross-boundary planning policy framework for matters of regional significance. The Strategic Development Plan would provide a regional spatial framework for the future development and use of land in the Cardiff Capital Region. It would provide an appropriate and effective footprint to deliver strategic, cross-boundary land use planning at the regional scale, supporting the region's economic, transport/connectivity and other aspirations. It would help guide and provide certainty for strategic public and private investment decisions including those made under the City Deal initiative and beyond. It is recommended that Council formally resolves to be part of the South East Wales Strategic Development Plan.</p>
<p><b>Name of Service</b></p> <p>Planning (Planning Policy)</p>	<p><b>Date Future Generations Evaluation form completed</b></p> <p>28/02/2018</p>

**1. 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.

Well Being Goal	How does the proposal contribute to this goal? (positive and negative)	What actions have been/will be taken to mitigate any negative impacts or better contribute to positive impacts?
	<p><i>Informative: The LDP was adopted by the Council in February 2014 and sets out the Council's vision and objectives for the development and use of land in Monmouthshire, together with the policies and proposals to implement them over the ten year period to 2021.</i></p>	



Well Being Goal	How does the proposal contribute to this goal? (positive and negative)	What actions have been/will be taken to mitigate any negative impacts or better contribute to positive impacts?
	<p><i>To ensure that LDPs are kept up-to-date, local planning authorities are required to commence a full review of their plans at least once every four years following plan adoption, or sooner if the findings of the Annual Monitoring Reports (AMR) indicate significant concerns with a plan's implementation. The latest Monmouthshire AMRs evidence the need for an early review of the LDP as a result of the need to address the shortfall in the housing land supply and to facilitate the identification and allocation of additional housing land.</i></p> <p><i>The LDP Regulations allow for a 'selective review' of part (or parts) of an LDP. Such a provision would allow for a partial review of the LDP to cover issues associated with the housing land supply and site selection, in accordance with the recommendation of the AMRs. The Council, however, is required to commence a full review of the LDP every four years. This would mean that a full review to meet statutory requirements would have to commence in February 2018. Consequently, a full review of the LDP commenced in 2017 and has culminated with the publication of a draft Review Report. The draft Review Report was subject to public consultation and has been updated to incorporate any relevant consultation responses. The final Review Report provides an overview of the issues that have been considered as part of the full review process and subsequently identifies the changes that are likely to be needed to the LDP, and why, based on evidence. The Review Report concludes by recommending that the LDP should be revised following the full revision procedure.</i></p> <p><i>Preparation of a Delivery Agreement (DA) is a key requirement in preparing a revised plan. The DA provides details of the various stages involved in the Plan-making process and the time each part of the process is likely to take, as well as the resources that the Council will commit to Plan preparation (the timetable). It also sets out the way in which the Council proposes to involve the local community and other stakeholders in the preparation of the revised LDP (the Community Involvement Scheme).</i></p> <p><i>It is recommended that Council formally resolves to be part of the South East Wales Strategic Development Plan (SDP). The SDP would enable a regional spatial planning framework for the region to effectively address cross-boundary planning policy matters of regional significance.</i></p>	
<b>A prosperous Wales</b>	<i>The LDP strategy seeks to increase employment opportunities within Monmouthshire; the policy</i>	The Review Report recommends continuation of the monitoring of employment land supply and take up throughout the County through the annual

Well Being Goal	How does the proposal contribute to this goal? (positive and negative)	What actions have been/will be taken to mitigate any negative impacts or better contribute to positive impacts?
<p>Efficient use of resources, skilled, educated people, generates wealth, provides jobs</p>	<p><i>framework protects existing employment sites and allocates additional land for employment use.</i></p> <p><b>Positive:</b> The Review Report reviews the implementation of the Plan as a whole, including employment policies. It also considers how the LDP objectives are being delivered, many of those objectives being directly related to creating a prosperous Wales.</p> <p>The Draft Delivery agreement sets out how the plan will be delivered to the timetable identified and how stakeholder /community's involvement will help to shape the revised plan.</p> <p>The SDP would enable full and proper consideration of cross-boundary strategic employment issues and would seek to increase employment/wealth generation opportunities across the South East Wales region.</p> <p><b>Negative:</b> None.</p>	<p>Employment Land Survey undertaken by the Planning Policy Service. A common methodology has been produced for monitoring employment land and property provision on a regional basis. This methodology will be utilised in LDP revision to provide a comprehensive evidence base. The revision of the Plan will provide the opportunity to ensure that the issues, objectives, policies and proposals relating to economic considerations are up-to-date and relevant.</p> <p>The Draft Delivery agreement ensures that the plan will be delivered to the timetable identified and ensure full stakeholder /community's involvement to shape the revised plan.</p> <p>The involvement in the SDP will ensure full consideration is given to community/Council aspirations associated with Future Monmouthshire and CCR City Deal and to address opportunities associated with the removal the Severn Bridge Tolls.</p>
<p><b>A resilient Wales</b> Maintain and enhance biodiversity and ecosystems that support resilience and can adapt to change (e.g. climate change)</p>	<p><i>The LDP strategy seeks to maintain and enhance biodiversity within Monmouthshire; the policy framework protects existing sites and promotes green infrastructure.</i></p> <p><b>Positive:</b> The Review Report reviews the implementation of the Plan as a whole, including policies that address biodiversity impacts. It also considers how the LDP objectives are being</p>	<p>The Review Report sets out significant contextual changes that have occurred since LDP adoption including details in relation to the Environment (Wales) Act and Natural Resources Policy. Plan revision will provide the opportunity to incorporate this updated legislation into the LDP policy framework. It will also provide the opportunity to ensure that the issues, objectives, policies and</p>


Well Being Goal	How does the proposal contribute to this goal? (positive and negative)	What actions have been/will be taken to mitigate any negative impacts or better contribute to positive impacts?
	<p>delivered, a number of which being directly related to creating a resilient Wales.</p> <p>The Draft Delivery agreement sets out how the plan will be delivered to the timetable identified and how stakeholder /community's involvement will help to shape the revised plan</p> <p>The SDP would enable a regional spatial planning framework for the region to effectively address cross-boundary planning policy matters of regional significance, including relevant biodiversity matters.</p> <p><b>Negative:</b> None.</p>	<p>proposals relating to biodiversity are up-to-date and relevant.</p> <p>The Draft Delivery agreement ensures that the plan will be delivered to the timetable identified and ensure full stakeholder /community's involvement to shape the revised plan.</p> <p>The SDP would enable a consistent regional approach to biodiversity considerations, including resilience and adaption, across the South East Wales region.</p>
<p><b>A healthier Wales</b> People's physical and mental wellbeing is maximized and health impacts are understood</p>	<p><b>Positive:</b> The Review Report reviews the implementation of the Plan as a whole, including policies that address green infrastructure and place-making and a range of sustainability indicators including air and water quality. It also considers how the LDP objectives are being delivered, a number of which being directly related to well-being.</p> <p>The Draft Delivery agreement sets out how the plan will be delivered to the timetable identified and how stakeholder /community's involvement will help to shape the revised plan</p> <p>The SDP would enable a regional spatial planning framework for the region to effectively address</p>	<p>The Review Report sets out significant contextual changes that have occurred since LDP adoption including details in relation to the Well-being of Future Generations Act. Plan revision will provide the opportunity to incorporate this updated legislation into the LDP policy framework. Creating healthy communities forms part of delivering sustainable development. It will also provide the opportunity to ensure that the issues, objectives, policies and proposals relating to well-being are up-to-date and relevant. The revised LDP would incorporate a Health Impact Assessment at key stages.</p> <p>The Draft Delivery agreement ensures that the plan will be delivered to the timetable identified and</p>


Well Being Goal	How does the proposal contribute to this goal? (positive and negative)	What actions have been/will be taken to mitigate any negative impacts or better contribute to positive impacts?
	<p>cross-boundary planning policy matters of regional significance, including well-being.</p> <p><b>Negative:</b> None.</p>	<p>ensure full stakeholder /community's involvement to shape the revised plan.</p> <p>The SDP would also enable full consideration of the Well-being of Future Generations Act in a regional spatial planning framework.</p>
<p><b>A Wales of cohesive communities</b> Communities are attractive, viable, safe and well connected</p>	<p><b>Positive:</b> The Review Report reviews the implementation of the Plan as a whole, including the spatial strategy and policies relating to housing provision (market and affordable), employment, and tourism.</p> <p>The Draft Delivery agreement sets out how the plan will be delivered to the timetable identified and how stakeholder /community's involvement will help to shape the revised plan</p> <p>The SDP would enable full and proper consideration of cross-boundary strategic housing and employment issues and would seek to ensure that well-being goals are consistently met across the South East Wales region.</p> <p><b>Negative:</b> None.</p>	<p>Plan revision will provide the opportunity to reassess the spatial strategy and key housing and employment policies to ensure that they are up-to-date and relevant. This will also ensure that well-being goals are met to satisfy the needs of future generations. Providing for employment and housing (both market and affordable) are key to ensuring balanced and sustainable communities. At present this is at risk due to the impact of rising house prices and job availability on our demography, as well as the County's ageing population and its associated needs.</p> <p>The Draft Delivery agreement ensures that the plan will be delivered to the timetable identified and ensure full stakeholder /community's involvement to shape the revised plan.</p> <p>The involvement in the SDP will ensure full consideration is given to the Council's aspirations associated with Future Monmouthshire and City Deal and to address opportunities associated with the removal the Severn Bridge Tolls.</p>
<p><b>A globally responsible Wales</b></p>	<p><b>Positive:</b> The Review Report has considered the impact of the LDP on the social, economic and</p>	<p>The Review Report identifies the need to revise the SA of the Plan. LDP Revision provides an</p>

Well Being Goal	How does the proposal contribute to this goal? (positive and negative)	What actions have been/will be taken to mitigate any negative impacts or better contribute to positive impacts?
<p>Taking account of impact on global well-being when considering local social, economic and environmental wellbeing</p>	<p>environmental well-being of the County. The SA framework, including objectives, have been continually monitored since LDP adoption which has assessed the extent to which the LDP is contributing to achieving sustainable development.</p> <p>The Draft Delivery agreement sets out how the plan will be delivered to the timetable identified and how stakeholder /community's involvement will help to shape the revised plan</p> <p>The SDP would be prepared having full regard to the social, economic and environmental well-being of the South East Wales region.</p> <p><b>Negative:</b> None.</p>	<p>opportunity to review these SA objectives to ensure they remain up to date and relevant. The environmental baseline, plans policies and programmes will also be updated.</p> <p>The Draft Delivery agreement ensures that the plan will be delivered to the timetable identified and ensure full stakeholder /community's involvement to shape the revised plan.</p> <p>The SDP preparation process would be subject to SA/SEA which would ensure that social, economic and environmental objectives are fully considered throughout the process.</p>
<p><b>A Wales of vibrant culture and thriving Welsh language</b> Culture, heritage and Welsh language are promoted and protected. People are encouraged to do sport, art and recreation</p>	<p><b>Positive:</b> The Review Report reviews the implementation of the Plan as a whole, including objectives and policies relating to heritage and recreation/community facilities. The Review Report refers to updated national planning policy guidance in respect of both heritage and the Welsh language and how these must be considered in LDP revision.</p> <p>The Draft Delivery agreement sets out how the plan will be delivered to the timetable identified and how stakeholder /community's involvement will help to shape the revised plan.</p>	<p>Plan revision will provide the opportunity to incorporate the latest guidance into the LDP policy framework. The Planning (Wales) Act 2015 provides a statutory basis to the established practice of giving consideration to the impacts of LDPs on the use of the Welsh language and that sustainability appraisals include specific consideration of such impacts. It will also provide the opportunity to ensure that the issues, objectives, policies and proposals relating to culture, heritage and Welsh language are up-to-date and relevant.</p> <p>Similarly, SDP preparation would ensure a consistent approach to these important issues across the region.</p>


Well Being Goal	How does the proposal contribute to this goal? (positive and negative)	What actions have been/will be taken to mitigate any negative impacts or better contribute to positive impacts?
	<p>The SDP would enable a regional spatial planning framework for the region to effectively address cross-boundary planning policy matters of regional significance, including culture, heritage and Welsh language, as well as recreation.</p> <p><b>Negative:</b> None.</p>	<p>The Community Involvement Scheme provides detail on the Welsh language and Bilingual involvement and how bilingual engagement will be undertaken throughout the Revised LDP process.</p>
<p><b>A more equal Wales</b> People can fulfil their potential no matter what their background or circumstances</p>	<p><b>Positive:</b> The Review Report reviews the implementation of the Plan as a whole and considers the LDP's impact on the social, economic and environmental well-being of the County.</p> <p>The Draft Delivery agreement sets out how the plan will be delivered to the timetable identified and how stakeholder /community's involvement will help to shape the revised plan</p> <p>The SDP would enable regional spatial planning framework for the region to effectively address cross-boundary planning policy matters of regional significance, including housing (market and affordable) housing delivery and well-being.</p> <p><b>Negative:</b> None.</p>	<p>A revised LDP is required to address the shortfall in the housing land supply and to facilitate the identification and allocation of additional housing land. This shortfall affects the ability of our communities to secure appropriate and affordable accommodation. Creating a more equal Wales forms part of delivering sustainable development.</p> <p>The Draft Delivery agreement ensures that the plan will be delivered to the timetable identified and ensure full stakeholder /community's involvement to shape the revised plan.</p> <p>The SDP would enable a regional spatial planning framework for South East Wales which would enable full and proper consideration of cross-boundary strategic housing and employment issues and would seek to well-being goals are consistently met across the South East Wales region.</p>


**2. How has your proposal embedded and prioritised the sustainable governance principles in its development?**


Sustainable Development Principle	How does your proposal demonstrate you have met this principle?	What has been done to better to meet this principle?
<p>Page 443</p>  <p>Balancing short term need with long term and planning for the future</p>	<p><i>We are required to look beyond the usual short term timescales for financial planning and political cycles and instead plan with the longer term in mind (i.e. 20+ years)</i></p> <p>The Review Report considers short/medium term impacts since Plan adoption and sets out the options for revising the Plan up to 2033. Plan revision will enable reconsideration of the issues facing Monmouthshire over the longer term. Sustainable development is central to the adopted LDP and will continue to be in future plans.</p> <p>The Draft Delivery agreement sets out how the plan will be delivered to the timetable identified and how stakeholder /community's involvement will help to shape the revised plan.</p> <p>Involvement in the SDP would provide an opportunity to realise MCC aspirations for future growth both in the short term and long term (potential for a new settlement) which would have a positive effect on affordability and assist in rebalancing demography while sustaining rural communities/the County as a whole.</p>	<p>The Review Report sets out the option for revising the LDP over an extended plan period. The SA framework, including objectives, have been continually monitored since LDP adoption, LDP Revision provides an opportunity to revise both the Plan and SA objectives to ensure they remain up to date and relevant.</p> <p>The Draft Delivery agreement ensures that the plan will be delivered to the timetable identified and ensure full stakeholder /community's involvement to shape the revised plan.</p> <p>While informal regional work has been undertaken previously, involvement in the SDP would enable Monmouthshire to be involved in a proper spatial planning framework for the region.</p>

Sustainable Development Principle	How does your proposal demonstrate you have met this principle?	What has been done to better to meet this principle?
 <p>Working together with other partners to deliver objectives</p>	<p>The Review Report reviews LDP implementation and delivery. The LDP was prepared through extensive engagement with a wide range of internal and external stakeholders. The Review Report considers opportunities for joint working with neighbouring authorities. Responses from the Draft Review Report consultation have informed the final Review Report which seeks to initiate the LDP revision process.</p> <p>The 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 revised LDP.</p> <p>Collaboration with local planning authorities in the South East Wales region would be fundamental to involvement in the Strategic Development Plan in order to provide a regional spatial planning framework.</p>	<p>The Review Report considers opportunities for collaborative working and notes where joint working has been undertaken to date. The Review Report and subsequent revision of the LDP will be taken forward through extensive stakeholder engagement as prescribed within the Draft Delivery Agreement, expanding on the methods used previously.</p> <p>SDP preparation would require extensive partnership working to ensure that full account is taken of the views/issues/objectives of all partners in the region.</p>



Sustainable Development Principle	How does your proposal demonstrate you have met this principle?	What has been done to better to meet this principle?
 <p>Involving those with an interest and seeking their views</p>	<p><i>Who are the stakeholders who will be affected by your proposal? Have they been involved?</i></p> <p>A number of Internal Officer Working Groups have been held to consider how LDP policies are working in practice. Discussions have also taken place externally with housing developers and the Rural Housing Enabler. The Draft Review Report was subject to an eight week consultation period which enabled all those with an interest in the LDP to express their views.</p> <p>The 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 revised LDP.</p> <p>Collaboration with local planning authorities in the South East Wales region would be fundamental to involvement in the Strategic Development Plan in order to provide a regional spatial planning framework. The SDP will be subject to extensive consultation throughout the plan preparation process.</p>	<p>The Draft Review Report has been subject to an eight week consultation period. The responses received from the consultation have been evaluated and used to inform the final Review Report where appropriate.</p> <p>The Draft Delivery Agreement builds on engagement methods used previously in the LDP process and provides information relating to the proposed methods to be utilised in the revision of the Plan. It includes extensive detail on who the Council will involve, when they will be involved and how they will be involved.</p> <p>The SDP would be subject to extensive consultation throughout the plan preparation process to enable those with an interest in the plan to share their views.</p>

Sustainable Development Principle	How does your proposal demonstrate you have met this principle?	What has been done to better to meet this principle?
 <p>Putting resources into preventing problems occurring or getting worse</p>	<p>The findings of the latest AMRs, which identified concerns with some of the Plan’s housing provision policies, triggered the need for an early full review of the LDP. The AMRs identified the need to address the housing land shortfall through the identification/allocation of additional housing sites. The Review Report reviews LDP implementation and delivery as a whole and determines whether the Plan’s policies are functioning effectively.</p> <p>The Draft Delivery agreement sets out how the plan will be delivered to the timetable identified and how stakeholder /community’s involvement will help to shape the revised plan.</p> <p>The SDP would enable full and proper consideration of cross-boundary strategic planning issues, including housing (market and affordable) and employment delivery, across the South East Wales region.</p>	<p>The commencement of a Revised LDP will enable concerns identified in relation to housing (market and affordable) provision to be addressed, including the identification of additional sites to address the housing land supply shortfall.</p> <p>The Draft Delivery agreement ensures that the plan will be delivered to the timetable identified and ensure full stakeholder /community’s involvement to help shape the revised plan.</p> <p>The proactive involvement of Monmouthshire in the SDP would provide an opportunity to realise MCC aspirations for future growth both in the short term and long term linked to Cardiff Capital Region City Deal, Future Monmouthshire and removal of the Severn Bridge Tolls (potential for a new settlement) which would have a positive effect on affordability and assist in rebalancing demography while sustaining rural communities/the County as a whole.</p>

Sustainable Development Principle	How does your proposal demonstrate you have met this principle?	What has been done to better to meet this principle?
 <p>Positively impacting on people, economy and environment and trying to benefit all three</p>	<p><i>There is space to describe impacts on people, economy and environment under the Wellbeing Goals above, so instead focus here on how you will better integrate them and balance any competing impacts</i></p> <p>The Review Report reviews the implementation of the Plan as a whole, including policies and objectives relating to the social, economic and environmental well-being of the County. LDP Revision will provide the opportunity to ensure that the issues, objectives, policies and proposals are up-to-date and relevant.</p> <p>The Draft Delivery agreement sets out how the plan will be delivered to the timetable identified, including the SA/SEA process, and how stakeholder /community's involvement will help to shape the revised plan.</p> <p>The SDP would be prepared having full regard to the social, economic and environmental well-being of the South East Wales region.</p>	<p>The Review Report emphasises revision of the LDP will be subject to a SA/SEA that balances the impacts on social, economic and environmental factors.</p> <p>The Draft Delivery agreement ensures that the plan will be delivered to the timetable identified, including the SA/SEA process, and ensure full stakeholder /community involvement to help shape the revised plan.</p> <p>The SDP would be subject to SA/SEA which would ensure that social, economic and environmental objectives are fully considered throughout the process.</p>

**3. Are your proposals going to affect any people or groups of people with protected characteristics?** Please explain the impact, the evidence you have used and any action you are taking below.

Protected Characteristics	Describe any positive impacts your proposal has on the protected characteristic	Describe any negative impacts your proposal has on the protected characteristic	What has been/will be done to mitigate any negative impacts or better contribute to positive impacts?
Age	<p>The Review Report reviews existing LDP policies including those relating to amenity, health, access to community facilities and open space. These matters affect all of our communities but could disproportionately affect children and elderly people who may have limited ability to travel greater distances.</p> <p>These matters would be fully considered and addressed in the SDP preparation process.</p>	None	<p>The Review Report identifies any issues that need to be considered in the revision of the LDP, including areas of amenity importance/open space. The Community Involvement Scheme sets out the way in which the Council proposes to involve the local community and other stakeholders, including different age groups, in the preparation of the revised LDP.</p>
Disability	<p>The Review Report reviews existing LDP policies including those relating to amenity, health, access to community facilities and open space. These matters affect all of our communities but could disproportionately affect people with disabilities who may have limited ability to travel greater distances. The Community Involvement Scheme provides commitment to actively encourage engagement with disable people by utilising the Access for All forum.</p> <p>These matters would be fully considered and addressed in the SDP preparation process</p>	None	<p>The Review Report identifies any issues that need to be considered in the revision of the LDP, including areas of amenity importance/open space. The Community Involvement Scheme sets out aims to include those with disabilities who were not engaged in plan preparation previously, in order to enable them to influence the policies and decisions that affect them.</p>
Gender reassignment	None	None	N/A
Marriage or civil partnership	None	None	N/A

Protected Characteristics	Describe any positive impacts your proposal has on the protected characteristic	Describe any negative impacts your proposal has on the protected characteristic	What has been/will be done to mitigate any negative impacts or better contribute to positive impacts?
Race	None	None	N/A
Religion or Belief	None	None	N/A
Sex	None	None	N/A
Sexual Orientation	None	None	N/A
Welsh Language	<p>The Community Involvement Scheme provides detail on the Welsh language and Bilingual involvement and how bilingual engagement will be undertaken throughout the LDP Revision process.</p> <p>Welsh language considerations would be fully considered and addressed as part of the SDP preparation process.</p>	None	<p>The Review Report identifies any issues that need to be considered in the revision of the LDP and subsequently identifies the changes that are likely to be needed, and why, based on evidence. The Planning (Wales) Act 2015 provides a statutory basis to the established practice of giving consideration to the impacts of LDPs on the use of the Welsh language and that sustainability appraisals include specific consideration of such impacts.</p> <p>The Review Report refers to updated national planning policy guidance in respect of the Welsh language and how this must be considered in revision of the LDP.</p> <p>The Community Involvement Scheme sets out how the Welsh language and bilingual involvement will be undertaken throughout the Revised LDP process.</p>

4. **Council has agreed the need to consider the impact its decisions has on important responsibilities of Corporate Parenting and safeguarding. Are your proposals going to affect either of these responsibilities?** For more information please see the guidance note <http://hub/corporatedocs/Democratic%20Services/Equality%20impact%20assessment%20and%20safeguarding.docx> and for more on Monmouthshire's Corporate Parenting Strategy see <http://hub/corporatedocs/SitePages/Corporate%20Parenting%20Strategy.aspx>

	<b>Describe any positive impacts your proposal has on safeguarding and corporate parenting</b>	<b>Describe any negative impacts your proposal has on safeguarding and corporate parenting</b>	<b>What will you do/ have you done to mitigate any negative impacts or better contribute to positive impacts?</b>
Safeguarding	None	None	N/A
Corporate Parenting	None	None	N/A

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

The LDP Review Report has been informed by the findings of the preceding Annual Monitoring Reports (2015, 2016 and 2017), significant contextual changes (legislative, national, regional and local) and updates to the LDP evidence base. The Review Report was also subject to public consultation for an 8 week period, responses have been considered and incorporated into the final Review Report as appropriate.

Officer Working Groups have been held with colleagues in the Development Management, Heritage, Countryside, Economic Development and Housing Services. Discussions with developers and the Rural Housing Enabler have also been undertaken in relation to Housing and Affordable Housing provision.

The Draft Delivery Agreement has been prepared having regard to of the various stages involved in the Plan-making process and realistic timescales for preparing each time, as well as to the resources (staff and financial) available. The Community Involvement Scheme has been prepared recognising the need for extensive stakeholder/community engagement throughout the plan preparation process, expanding on the methods used previously. Responses from the proposed targeted consultation on the Draft Delivery Agreement will inform the final Delivery Agreement as appropriate.

Extensive discussions have been held with other LPAs in the South East Wales region on the options for/opportunities associated with the preparation of a SDP. This has also been debated through the CCR. The concept is fully supported by officers from the ten CCR Authorities and formed part of the Growth Commission's report, which has previously been approved in principle by Council. There is a consensus amongst all 10 Leaders in the Cardiff Capital Region in support of the principle of an SDP for the region.

**6. 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?**

*This section should give the key issues arising from the evaluation which will be included in the Committee report template.*

**Positive** - The Review Report is a positive tool for identifying the likely changes needed to the LDP and, based on the evidence contained in the report and consultation responses, concludes that the LDP should be revised following the full revision procedure. The Draft Delivery Agreement, including the Community Involvement Scheme, set out the timetable for producing the revised LDP and the way in which the Council proposes to involve the local community and other stakeholders throughout the plan preparation process. The Strategic Development Plan would provide a regional spatial framework for the future development and use of land in the Cardiff Capital Region. It would provide an appropriate and effective footprint to deliver strategic, cross-boundary land use planning at the regional scale, supporting the region's economic, transport/connectivity and other aspirations. It would help guide and provide certainty for strategic public and private investment decisions including those made under the City Deal initiative and beyond.

**Negative** – None. There are no implications, positive or negative, for corporate parenting or safeguarding.

**7. Actions. As a result of completing this form are there any further actions you will be undertaking? Please detail them below, if applicable.**

D  
S  
E  
C  
I  
O  
N

What are you going to do	When are you going to do it?	Who is responsible	Progress
<p>Seek approval from Council for the commencement of a full revision to the LDP on a Monmouthshire only footprint. Seek Council endorsement of the draft Delivery Agreement, including Community Involvement Scheme, for the revised LDP with a view to issuing for targeted consultation purposes. Seek formal resolution from Council to be part of the South East Wales Strategic Development Plan.</p>	<p>Report these matters to Council 19<sup>th</sup> March 2018.</p> <p>Targeted consultation on the draft Delivery Agreement and Community Involvement Strategy will commence 20 March 2018 until 17 April 2018. Consultation responses to the Draft Delivery Agreement will be assessed and will inform the final Delivery Agreement as appropriate. The Final Delivery Agreement will be reported to Council for approval and to submit to Welsh Government for agreement.</p>	<p>Head of Planning, Housing and Place-Shaping</p> <p>Planning Policy Team</p>	<p>Political endorsement of the Final Delivery Agreement in May 2018 following targeted consultation. This will enable submission of the Delivery Agreement to the Welsh Government for agreement. Once agreed by Welsh Government, formal commencement of the LDP revision process.</p> <p>In terms of SDP progression, a number of important detailed matters would need to be resolved, which themselves will require political endorsement. These include the boundary of the SDP</p>

			<p>area, resources (both officer and financial), and governance (as detailed in the Council report accompanying this evaluation).</p>
--	--	--	---

**8. Monitoring: The impacts of this proposal will need to be monitored and reviewed. Please specify the date at which you will evaluate the impact, and where you will report the results of the review.**

<p><b>The impacts of this proposal will be evaluated on:</b></p>	<p>The draft Delivery Agreement will be reconsidered following the close of the targeted consultation period, the responses received will be evaluated and used to inform the final Delivery Agreement. The final Delivery Agreement will subsequently be submitted to the Welsh Government. Once agreed by the Welsh Government, the Council can proceed with the LDP revision to cover the 2018 – 2033 period.</p> <p>In terms of SDP progression, a number of important detailed matters would need to be resolved, which themselves will require political endorsement. These include the boundary of the SDP area, resources (both officer and financial), and governance (As detailed in the Council report accompanying this evaluation).</p>
--	--