

# Public Document Pack



County Hall  
Rhadyr  
Usk  
NP15 1GA

Monday, 6 December 2021

## Notice of meeting

# Special Meeting Economy and Development Select Committee

Tuesday, 14th December, 2021 at 2.00 pm

County Hall, Usk - Remote Attendance

## AGENDA

**THERE WILL BE A PRE MEETING FOR MEMBERS OF THE COMMITTEE 30 MINUTES PRIOR TO THE START OF THE MEETING**

Item No	Item	Pages
1.	Apologies for Absence.	
2.	Declarations of Interest.	
3.	Public Open Forum.  <b>Select Committee Public Open Forum ~ Guidance</b>  Our Select Committee meetings are live streamed and a link to the live stream will be available on the meeting page of the Monmouthshire County Council <a href="#">website</a>  If you would like to share your thoughts on any proposals being discussed by Select Committees, you can submit your representation in advance <a href="#">via this form</a>  Please share your views by uploading a video or audio file (maximum of 4 minutes) or; Please submit a written representation (via Microsoft Word, maximum of 500 words)  You will need to register for a <a href="#">My Monmouthshire account</a> in order	

to submit the representation or use your log in, if you have registered previously.

The deadline for submitting representations to the Council is 5pm three clear working days in advance of the meeting.

If representations received exceed 30 minutes, a selection of these based on theme will be shared at the Select Committee meeting. All representations received will be made available to councillors prior to the meeting.

If you would like to attend one of our meetings to speak under the Public Open Forum at the meeting, you will need to give three working days' notice by contacting [Scrutiny@monmouthshire.gov.uk](mailto:Scrutiny@monmouthshire.gov.uk)

The amount of time afforded to each member of the public to speak is at the chair's discretion, but to enable us to accommodate multiple speakers, we ask that contributions be no longer than 3 minutes.

If you would like to suggest future topics for scrutiny by one of our Select Committees, please do so by emailing [Scrutiny@monmouthshire.gov.uk](mailto:Scrutiny@monmouthshire.gov.uk)

4. **Replacement Local Development Plan (RLDP) - To consider the implications for Monmouthshire's communities of the Welsh Government's consultation response to the RLDP Preferred Strategy, in particular the Welsh Government's maximum dwelling requirement for the RLDP. Members will consider the modelling that will inform debate and will hear from the public and key stakeholders.**

1 - 40

**Paul Matthews**

**Chief Executive**

MONMOUTHSHIRE COUNTY COUNCIL  
CYNGOR SIR FYNWY

THE CONSTITUTION OF THE COMMITTEE IS AS FOLLOWS:

County Councillor Jeremy Becker	St. Mary's;	Liberal Democrats
County Councillor Alan Davies	Green Lane;	Independent
County Councillor David Evans	West End;	Welsh Labour/Llafur Cymru
County Councillor Mat Feakins	Drybridge;	Welsh Conservative Party
County Councillor Giles Howard	Llanfoist Fawr;	Welsh Conservative Party
County Councillor Paul Jordan	Cantref;	Welsh Conservative Party
County Councillor Richard Roden	Dixton with Osbaston;	Welsh Conservative Party
County Councillor Brian Strong	Usk;	Welsh Conservative Party
County Councillor Frances Taylor	Mill;	Independent Group

## Public Information

### Access to paper copies of agendas and reports

A copy of this agenda and relevant reports can be made available to members of the public attending a meeting by requesting a copy from Democratic Services on 01633 644219. Please note that we must receive 24 hours notice prior to the meeting in order to provide you with a hard copy of this agenda.

### Watch this meeting online

This meeting can be viewed online either live or following the meeting by visiting [www.monmouthshire.gov.uk](http://www.monmouthshire.gov.uk) or by visiting our Youtube page by searching MonmouthshireCC.

### Welsh Language

The Council welcomes contributions from members of the public through the medium of Welsh or English. We respectfully ask that you provide us with adequate notice to accommodate your needs.

# Aims and Values of Monmouthshire County Council

## Our purpose

Building Sustainable and Resilient Communities

### Objectives we are working towards

- Giving people the best possible start in life
- A thriving and connected county
- Maximise the Potential of the natural and built environment
- Lifelong well-being
- A future focused council

## Our Values

**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 to get involved so we can achieve great things together. We don't see ourselves as the '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.

## Monmouthshire Scrutiny Committee Guide

### Role of the Pre-meeting

1. Why is the Committee scrutinising this? (background, key issues)
2. What is the Committee's role and what outcome do Members want to achieve?
3. Is there sufficient information to achieve this? If not, who could provide this?
  - Agree the order of questioning and which Members will lead
  - Agree questions for officers and questions for the Cabinet Member

### Questions for the Meeting

#### Scrutinising Performance

1. How does performance compare with previous years? Is it better/worse? Why?
2. How does performance compare with other councils/other service providers? Is it better/worse? Why?
3. How does performance compare with set targets? Is it better/worse? Why?
4. How were performance targets set? Are they challenging enough/realistic?
5. How do service users/the public/partners view the performance of the service?
6. Have there been any recent audit and inspections? What were the findings?
7. How does the service contribute to the achievement of corporate objectives?
8. Is improvement/decline in performance linked to an increase/reduction in resource? What capacity is there to improve?

#### Scrutinising Policy

1. Who does the policy affect ~ directly and indirectly? Who will benefit most/least?
2. What is the view of service users/stakeholders? Do they believe it will achieve the desired outcome?
3. What is the view of the community as a whole - the 'taxpayer' perspective?
4. What methods were used to consult with stakeholders? Did the process enable all those with a stake to have their say?
5. What practice and options have been considered in developing/reviewing this policy? What evidence is there to inform what works?
6. Does this policy align to our corporate objectives, as defined in our corporate plan?
7. Have all relevant sustainable development, equalities and safeguarding implications been taken into consideration? For example, what are *the procedures that need to be in place to protect children*?
8. How much will this cost to implement and what funding source has been identified?
9. How will performance of the policy be measured and the impact evaluated.

### Questions for the Committee to conclude...

Do we have the necessary information to form conclusions/make recommendations to the executive, council, other partners? If not, do we need to:

- (i) Investigate the issue in more detail?
- (ii) Obtain further information from other witnesses – Executive Member, independent expert, members of the local community, service users, regulatory bodies...
- (iii) Agree further actions to be undertaken within a timescale/future monitoring report...

### General Questions....

#### Empowering Communities

- How are we involving local communities and empowering them to design and deliver services to suit local need?
- Do we have regular discussions with communities about service priorities and what level of service the council can afford to provide in the future?

### *Service Demands*

- How will policy and legislative change affect how the council operates?
- Have we considered the demographics of our council and how this will impact on service delivery and funding in the future?

### *Financial Planning*

- Do we have robust medium and long-term financial plans in place?
- Are we linking budgets to plans and outcomes and reporting effectively on these?

### *Making savings and generating income*

- Do we have the right structures in place to ensure that our efficiency, improvement and transformational approaches are working together to maximise savings?
- How are we maximising income? Have we compared other council's policies to maximise income and fully considered the implications on service users?
- Do we have a workforce plan that takes into account capacity, costs, and skills of the actual versus desired workforce?

**SUBJECT: WELSH GOVERNMENT RESPONSE TO MONMOUTHSHIRE'S REPLACEMENT LOCAL DEVELOPMENT PLAN PREFERRED STRATEGY**

**MEETING: SPECIAL MEETING OF ECONOMY AND DEVELOPMENT SELECT COMMITTEE**

**DATE: 14 DECEMBER 2021**

## 1. PURPOSE:

- 1.1 The purpose of this report is to invite the Economy and Development Select Committee to consider the implications for Monmouthshire's communities of the Welsh Government's consultation response to the Replacement Local Development Plan (RLDP) Preferred Strategy, in particular the Welsh Government's maximum dwelling requirement for the RLDP. The feedback from the meeting, including input from stakeholders and interested parties via public forum, will help inform the Council on how it proceeds with the RLDP.

## 2. RECOMMENDATIONS:

- 2.1 To consider the implications for Monmouthshire's communities of the Welsh Government's consultation response to the Preferred Strategy, in particular the Welsh Government's maximum dwelling requirement for the RLDP.

## 3. KEY ISSUES:

### Background

- 3.1 The Council is preparing a RLDP for the County (excluding the area within the Brecon Beacons National Park) to cover the period 2018-2033. The RLDP will set out land use development proposals for the County and will identify where and how much new, sustainable development will take place over the replacement Plan period. It will also identify areas to be protected from development and contain policies against which future planning applications will be assessed.
- 3.2 The RLDP is underpinned by a clear evidence base. Early stages of the project identified 38 issues based on a range of evidence including responses to consultation on the Public Service Board's Local Wellbeing Plan. The RLDP's issues, vision and objectives were subject of targeted engagement in January-February 2019 and were approved by Cabinet at the start of May 2019. They were reviewed in the light of the subsequent Climate Emergency declaration by Council in May 2019, and approved by Cabinet again in July 2019<sup>1</sup>. The seventeen objectives are grouped to reflect the seven wellbeing goals and not order of importance. However, as the Plan emerges, three core themes are apparent: affordable housing, demographic balance, and the climate emergency. The issues, vision and objectives were reviewed<sup>2</sup> in the light of the Covid-19 pandemic, which demonstrated that the Plan's strategic direction of

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<sup>1</sup> RLDP Issues, Vision and Objectives Paper (January 2019, as amended June 2019)  
<https://www.monmouthshire.gov.uk/app/uploads/2020/12/Draft-Issues-Vision-and-Objectives-Paper-June-2019.pdf>

<sup>2</sup> June 2020 and September 2020 <https://www.monmouthshire.gov.uk/planning-policy/plan-preparation/issues-vision-and-objectives/>

travel remains relevant and identified a number of key messages that will require ongoing consideration as the RLDP progresses.

- 3.3 The revisited RLDP Growth and Spatial Options Paper was subject to non-statutory consultation during January – February 2021. This set out alternative growth and spatial options for the RLDP, together with the implications of each option and the extent to which they would achieve the RLDP objectives. The consultation paper clearly identified the Council's preferred growth and spatial options that are considered to best address the County's key issues/challenges and meet the RLDP objectives.
- 3.4 Of note, Welsh Government, as a statutory consultee, was notified of this consultation but did not submit a response. In contrast, Welsh Government *did* respond to the previous Growth and Spatial Options in [July 2019](#), making no comment on the level of growth in the options. Planning officers met with Welsh Government officials including the Chief Planner in April 2021 to discuss what Future Wales the National Plan 2040 means for Monmouthshire. WG officials did not raise any concerns regarding the Council's preferred level of growth at that time.

### RLDP Preferred Strategy

- 3.5 The [Sustainable and Resilient Communities Strategy](#)<sup>3</sup> was endorsed by Council on 24<sup>th</sup> June 2021 for statutory consultation/engagement and stakeholder involvement for 9 weeks from 5<sup>th</sup> July to 31<sup>st</sup> August 2021. The Preferred Strategy provides the strategic direction for the development and use of land in Monmouthshire (excluding the area within the Brecon Beacons National Park) over the Plan period 2018 to 2033 and identifies how much sustainable growth is needed and where this growth will broadly be located. Its preparation was guided by a framework of key inputs that included the assessment and consideration of the growth and spatial options, responses from the consultation process, the findings of the [Integrated Sustainability Appraisal \(ISA\)](#), the [Sustainable Settlement Appraisal](#), [Future Wales the National Plan 2040](#), the LDP tests of soundness<sup>4</sup>, Welsh Government's [Building Better Places](#) document, and the pressing need to address the key challenges relating to the County's demography, affordability and climate emergency to achieve a sustainable balanced deliverable outcome.
- 3.6 The Preferred Growth Strategy is based on a population-led scenario. This means that the Strategy is built around the desired population profile in 2033, and the number of dwellings and jobs required to support that population outcome are added. Monmouthshire's population grows via inward migration: its natural population growth would otherwise be negative, with more deaths than births. A number of policy assumptions are designed into the Preferred Strategy to address the County's key demographic and affordability issues<sup>5</sup>. This approach is in accordance with planning policy guidance set out in PPW11 (paragraphs 4.26 – 4.27) and the Development Plans Manual (paragraphs 5.51 – 5.54 Alternative Growth Scenarios). These policy assumptions:
- adjust in-migration rates to reflect local trends over a five-year period (2015-2020) to take account of realistic levels of in-migration following removal of the Severn Bridge Tolls;
  - increase the household formation rates for the 19-34 year old age groups to provide homes for younger age groups currently unable to secure their own home within Monmouthshire and either living with friends or parents or leaving the County to secure a home elsewhere; and

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<sup>3</sup> <https://www.monmouthshire.gov.uk/app/uploads/2021/07/Preferred-Strategy-June-2021.pdf>

<sup>4</sup> <https://gov.wales/sites/default/files/publications/Planning/Development-plans-manual-edition-3-march-2020.pdf>

<sup>5</sup>



- reduce commuting ratio assumptions to reflect the Council’s aim of encouraging more in-County employment to reduce out-commuting. This objective is further supported by the Welsh Government target of 30% of the Welsh workforce working from home or near home, and the Welsh Government’s transport policy hierarchy which seeks to reduce the need to travel in the first instance, followed by active travel, then public transport, then the private car.

3.7 The Strategy also incorporates an affordable housing policy-led element to deliver additional affordable homes. This approach is supported by the Minister’s letters of July 2019 and November 2021 in which Julie James states (emphasis added):

*“The Welsh Government is determined to support the building of a new generation of council homes at scale and pace to meet the needs of communities across Wales. The direct provision of social housing requires concerted effort across the public sector...”*

***“When reviewing LDPs local planning authorities must make provision for affordable housing led housing sites. Such sites will include at least 50% affordable housing, which is defined as social rented housing provided by local authorities and registered social landlords, and intermediate housing where prices or rents are above those of social rent but below market levels and there are secure arrangements to recycle receipts to use for future affordable housing where full ownership is achieved. In the first instance affordable housing led housing sites should make use of public land. Where public land is not available, privately owned land may be identified. Sites should not be inferior in any way to sites which are being promoted for market housing.”***

Letter from Minister for Climate Change, Julie James, 8<sup>th</sup> July 2019 (Appendix 1)

***“Local Planning Authorities (LPAs) must, when complying with their statutory duty to prepare LDPs, address the need for affordable housing. Our national planning policy makes it clear that when reviewing LDPs, LPAs must make provision for affordable housing led housing sites. Such sites will include at least 50% affordable housing...”***

Letter from Minister for Climate Change, Julie James, 17<sup>th</sup> November 2021 (Appendix 2)

3.8 The affordable housing-led policy element would deliver approximately 1,410 additional homes of which 50% would be affordable. This additional element of growth aims to meet 10% of the Local Housing Market Assessment (LHMA) need (December 2020). The Preferred Strategy proposes 50% affordable housing-led sites on the basis that they would be deliverable and would create mixed, balanced communities. The level of housing to be provided on these additional sites was limited to approximately 1,410 homes to ensure the total level of growth in the Plan is sustainable, taking into account the findings of the Integrated Sustainability Appraisal.

3.9 Delivering the Sustainable and Resilient Communities Strategy requires the provision of 7,605 homes (507 dwellings per annum) to support the population-led scenario. This level of housing growth will enable the provision of market and affordable housing in both urban and rural areas and, vitally, it provides the opportunity to help address the County’s imbalanced demography, maintain an economically active labour force by retaining/attracting younger adult population age groups and assists in addressing

the County's affordable housing crisis. Land allocations, a policy framework for employment uses and wider Council initiatives, including the Council's Economic Ambition Statement, will support the provision of 7,215 jobs which would align with the increased economically-active population and ambitions to reduce out-commuting.

- 3.10 Taking account of the existing housing land supply and projected windfall sites, delivering the Preferred Strategy's housing requirement of 7,605 homes will require the allocation of sufficient land to accommodate 2,897 homes. (These figures exclude any potential flexibility allowance to enable a direct comparison with the Welsh Government's response to the Preferred Strategy). This is because we have a committed housing supply of 4,708 homes comprising:
- 1,218 homes already completed between 2018 and 2021;
  - 1,642 homes on sites that already have planning permission and are realistically expected to come forward by 2033;
  - 300 homes on three adopted LDP sites that are still progressing (Vinegar Hill, Undy; Tudor Road, Wyesham; and Drewen Farm, Monmouth);
  - 553 homes on windfall sites, based on past trends;
  - 995 homes on small sites of fewer than 10 homes, based on past trends (sites this small are not allocated in LDPs).
- 3.11 The Second Call for Candidate Sites commenced alongside the Preferred Strategy consultation. Approximately 450 responses have been received to the Preferred Strategy consultation. Approximately 150 candidate sites proposed for development have also been submitted, together with 8 candidate sites for protection.
- 3.12 Achieving the objectives of the Sustainable and Resilient Communities strategy and the three core challenges of affordable housing, demographic balance and the climate emergency will require a number of factors in the Deposit Plan: the allocation of sustainably located sites for development based on the principles of twenty minute neighbourhoods, prioritisation of brownfield sites, infrastructure to ensure connectivity and to support the travel hierarchy in the Monmouthshire context, and policies requiring net zero homes, ensuring a suitable housing mix, and considering other tools such as local sales.

#### Welsh Government Consultation Response to the RLDP Preferred Strategy

- 3.13 Welsh Government's consultation response to the RLDP Preferred Strategy covers four main matters within the Preferred Strategy:
- 1) Absence of four evidence-base papers relating to strategic site delivery, high-level/site-specific viability appraisal, renewable energy assessment and a gypsy and traveller assessment.  
This evidence base is all in hand to inform the Deposit Plan and we have deliberately sequenced the work this way. Of note, the Council submitted its Gypsy Traveller Accommodation Assessment to WG in January 2021 and is still awaiting sign-off.
  - 2) Helpful comments are provided suggesting improvements to the wording of strategic policies.
  - 3) Concerns about delivery of our employment aspirations.
  - 4) An objection to our proposed housing growth of 7,605 homes and a proposed maximum growth of between 2,610 and 4,275 homes. This objection is based on the underlying opinion that Monmouthshire's proposed growth level will impact on Future Wales 2040's 'national growth area' comprising Newport, Cardiff and the South Wales valleys.

The fourth point above is the primary concern that requires consideration by this Select Committee to understand its implications.

3.14 WG sets out an objection (attached at **Appendix 3**) regarding the Strategy's 'general conformity' with policies 1 and 33 of Future Wales the National Plan 2040. In Annex A of the consultation response, Welsh Government seek to prescribe to Monmouthshire County Council a maximum dwelling growth of 4,275 dwellings over the Plan period 2018-2033 which equates to 285 dwellings per annum, stating:

*“To be considered to be in general conformity with Future Wales the Monmouthshire RLDP must provide for a lower level of housing. The WG principal housing projection for the plan area, 2,610 units, provides a starting point for the level of housing required. In recognition of build rates achieved over the last 10 years, a higher level of housing may be justified. The proposed level of housing growth should however be no greater than 4,275 units (15 x the 10 year build rate) plus an appropriate flexibility allowance. This will ensure that Monmouthshire continues grow in a sustainable manner based on a locally appropriate level of development which is compatible with policies 1 and 33 of Future Wales”*

3.15 To help frame this discussion, this report sets out below a number of key aspects for consideration:

- The status of the Welsh Government's letter;
- The origin of the Future Wales 2040 population projections for the region;
- The implications of the Welsh Government's maximum growth level of 4,275 homes on the content of the RLDP;
- The implications of the Welsh Government's maximum growth level of 4,275 homes on achieving the core RLDP objective to deliver affordable housing;
- The implications of the Welsh Government's maximum growth level of 4,275 homes on the achieving the core RLDP objective of greater demographic balance to ensure sustainable and resilient communities;
- The implications of the Welsh Government's maximum growth level of 4,275 homes on the economic prosperity of Monmouthshire's communities;
- The appropriateness of WG prescribing a maximum growth level on a Local Planning Authority;
- The appropriateness of using past build rates as a methodology;
- General conformity with Future Wales 2040; and
- Consideration of whether such a Plan would meet the tests of soundness.

#### The status of the WG letter

3.16 The Welsh Government's letter is a representation from a statutory consultee on the RLDP. Although an important stakeholder, the Welsh Government is not the ultimate decision-maker on the RLDP: it is the independent planning inspector who, at examination, will determine whether or not Monmouthshire's RLDP is sound.

#### The origin of the Future Wales 2040 population projections for the region

3.17 FW2040 states at page 167 that:

*“Under the Welsh Government central estimates 66,400 additional homes are needed in the region until 2039 and over the initial five years (2019-20 to 2023-24) 48% of the additional homes needed should be affordable homes. These estimates provide part of the evidence and context on which Housing Requirements for Strategic Development Plans can be based and should be considered at the regional scale. Understanding and managing different development pressures across the region will be a key issue for Strategic Development Plans. Strategic housing issues must be considered at the regional level and not on the basis of the aspirations of individual local planning authorities.”*

- 3.18 The Welsh Government’s response to Monmouthshire’s Preferred Strategy focuses on the population projections in FW2040. Housing need figures are not the same as housing requirement figures, the latter being the result of applying outcome-based policy adjustments and aspiration.
- 3.19 Planning Policy Wales edition 11 (PPW11) notes that WG projections are part of the evidence base, along with the LHMA and Well-being Plan, when considering the housing requirement. They are not the starting point when considering the housing requirement. This is at odds with the advice in the letter which refers to the PS housing requirement figure being 4,995 dwellings above the WG principal projections.

PPW11 states:

*“4.2.6 The latest Welsh Government local authority level Household Projections for Wales, alongside the latest Local Housing Market Assessment (LHMA) and the Well-being plan for a plan area, will form a fundamental part of the evidence base for development plans. These should be considered together with other key evidence in relation to issues such as what the plan is seeking to achieve, links between homes and jobs, the need for affordable housing, Welsh language considerations and the deliverability of the plan, in order to identify a appropriate strategy for the delivery of housing in the plan area. Appropriate consideration must also be given to the wider social, economic, environmental and cultural factors in a plan area in order to ensure the creation of sustainable places and cohesive communities.*

*4.2.7 Household projections provide estimates of the future numbers of households and are based on population projections and assumptions about household composition and characteristics. Certain elements of the projections, such as births and deaths, will remain relatively constant throughout the plan period. However other elements, such as migration and household formation rates, have the ability to influence outcomes significantly. Planning authorities need to assess whether the various elements of the projections are appropriate for their area, and if not, undertake modelling, based on robust evidence, to identify alternative options.”*

The implications of the Welsh Government’s maximum growth level of 4,275 homes on the content of the RLDP

- 3.20 As set out in paragraph 3.10 above, we have 4,708 homes in our committed housing supply. This means a RLDP with growth capped at 4,275 homes (285 dwellings per annum) would contain no new housing allocations. This is illustrated in the table below. Even with a 10% flexibility allowance added (giving a total of 4,703 homes) there would not be a need for any new housing allocations over the Plan period.

	<b>RLDP Preferred Strategy</b>	<b>WG proposed maximum growth level</b>
<b>Number of Dwellings 2018 - 2033</b>	<b>7,605 (507 dpa)</b>	<b>4,275 (285 dpa)</b>
<b>Existing Commitments &amp; Allowances</b>	<b>4,708</b>	<b>4,708</b>

<b>New Housing Allocations</b>	<b>2,897</b>	<b>0</b>
<b>Number of Jobs 2018 - 2033</b>	<b>7,215 (481 pa)</b>	<b>4,230 (282 pa)</b>

- 3.21 This Welsh Government maximum level of growth is significantly below the current (adopted) LDP dwelling requirement of 4,500 homes (450 dwellings per annum). As demonstrated in our AMRs, while the delivery of LDP allocated sites was initially slower than anticipated, the sites are now progressing at pace with recent build rates being close to the LDP dwelling requirement – illustrated below. Build rates over the past 5 years have averaged 347 dwellings per annum, substantially above the WG maximum figure. Taking account of completions, existing commitments, windfalls and small sites, even without any new housing allocations, there would be a surplus/over provision of 433 dwellings over the Plan period.
- 3.22 This Select Committee is invited to consider the implications of not allocating any new land for residential development on the Council's ability to deliver the range/number of homes to address the demographic imbalance, to retain and attract the economically active age groups and to provide the type of homes the ageing demographic would require.

The implications of the Welsh Government's maximum growth level of 4,275 homes on achieving the core RLDP objective to deliver affordable housing

#### **RLDP Objective 10: Housing Delivery**

**Provide a level of housing that is sufficient to provide a wide-ranging choice of homes both for existing and future residents, while ensuring that local needs for appropriate, affordable and accessible housing are met as far as possible, particularly in towns but also in rural areas, so long as such housing can assist in building sustainable balanced communities.**

- 3.23 At June 2021, our affordable housing waiting list comprised 2,440 households in housing need (bands 1-4). The Local Housing Market Assessment (December 2020) identifies an affordable housing delivery need of 468 affordable homes per annum over the next five years. While it is accepted that LHMA need cannot be delivered solely via LDPs, it shows the scale of the County's problem. Of this need, the evidence shows that 68% is for social rented homes, 7% for intermediate rent and 25% for low cost home ownership (LCHO).
- 3.24 The RLDP Preferred Strategy's housing requirement (without flexibility added) would deliver approximately 2,169 affordable homes. There are approximately 961 affordable homes in our committed housing supply: the WG maximum housing growth figure therefore caps us at achieving roughly this level of affordable housing provision over the Plan period. Given that the Welsh Government's maximum level of growth requires no new housing allocations, the only scope to increase affordable housing delivery lies with the 1,848 dwellings that do not yet have planning permission. However, of these, 995 homes are on small site windfalls, a large proportion will be developments of 1-4 homes which typically provide a commuted sum rather than on-site affordable housing. A further 300 homes are on current LDP allocations which are progressing under the adopted LDP policies. Without any new housing land allocations, there can be no land supply to support different delivery models such as a Council-led Development Company.

3.25 Future Wales Policy 7 'Delivering Affordable Homes' states:

*"The Welsh Government will increase delivery of affordable homes by ensuring that funding for these homes is effectively allocated and utilised. Through their Strategic and Local Development Plans planning authorities should develop strong evidence-based policy frameworks to deliver affordable housing, including setting development plan targets based on regional estimates of housing need and local assessments. In response to local and regional needs, planning authorities should identify sites for affordable housing led developments and explore all opportunities to increase the supply of affordable housing."*

3.26 Of note, the WG maximum growth level would rule out the provision of any new affordable housing-led allocations, despite this being a clear requirement set out in the letters from Julie James of July 2019 and November 2021 (emphasis added):

*"The Welsh Government is determined to support the building of a new generation of council homes at scale and pace to meet the needs of communities across Wales. **The direct provision of social housing requires concerted effort across the public sector...**"*

*"Up to date Local Development Plans (LDPs) are a cornerstone for housing delivery by identifying the best sites for new homes. **Local planning authorities must, when complying with their statutory duty to prepare LDPs, address the need for affordable housing.**"*

*"**LDPs must be informed by evidence including the estimates of housing need in Wales by tenure and Local Housing Market Assessments which together identify the type and tenure of housing required...**"*

*"**When reviewing LDPs local planning authorities must make provision for affordable housing led housing sites. Such sites will include at least 50% affordable housing**, which is defined as social rented housing provided by local authorities and registered social landlords, and intermediate housing where prices or rents are above those of social rent but below market levels and there are secure arrangements to recycle receipts to use for future affordable housing where full ownership is achieved. In the first instance affordable housing led housing sites should make use of public land. Where public land is not available, privately owned land may be identified. Sites should not be inferior in any way to sites which are being promoted for market housing."*

Letter from Minister for Climate Change, Julie James, 8<sup>th</sup> July 2019 (Appendix 1)

*"Up to date Local Development Plans (LDPs) are a cornerstone for housing delivery by identifying the best sites for new homes. **Local Planning Authorities (LPAs) must, when complying with their statutory duty to prepare LDPs, address the need for affordable housing. Our national planning policy makes it clear that when reviewing LDPs, LPAs must make provision for affordable housing led housing sites. Such sites will include at least 50% affordable housing**, which is defined as social rented housing provided by local authorities and registered social landlords, and intermediate housing where prices or rents are above those of social rent but below market levels and there are secure arrangements to recycle receipts to use for future affordable housing where full ownership is achieved. In the first instance affordable housing led housing sites should make use of public land. Where public land is not available, privately owned land may be identified. Sites*

*should not be inferior in any way to sites which are being promoted for market housing.”*

Letter from Minister for Climate Change, Julie James, 17<sup>th</sup> November 2021  
(Appendix 2)

- 3.27 Good quality and affordable housing is important in achieving poverty reduction and equitable prosperity, and supporting the best start in life. The Select Committee is invited to consider the extent to which the WG maximum growth level will address the key housing affordability issue in the County (RLDP Objectives 9, 10, 11, 12 and 13), meet the evidenced affordable housing need in the County (2,440 households in bands 1-4 at June 2021), comply with the requirements of the Minister’s letters dated July 2019 and November 2021, and be consistent with Policy 7 of Future Wales 2040 which requires local planning authorities to identify sites for affordable housing-led developments in response to local needs.

The implications of the Welsh Government’s maximum growth level of 4,275 homes on the achieving the core RLDP objective of greater demographic balance

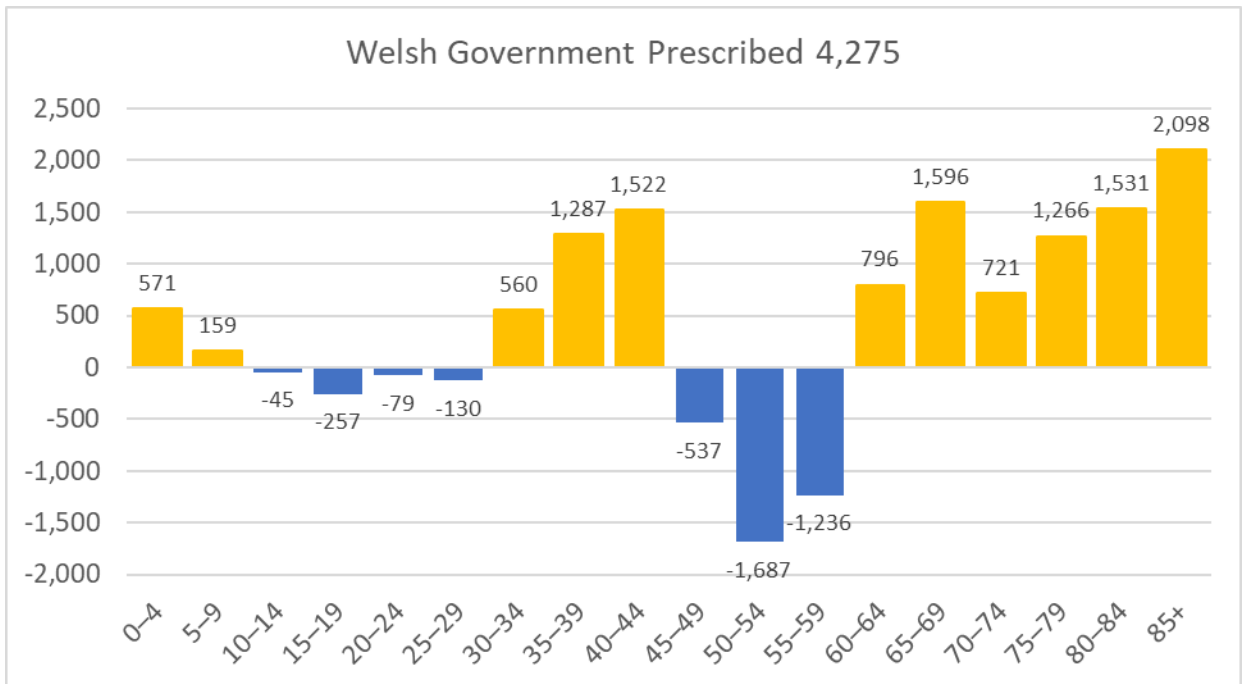
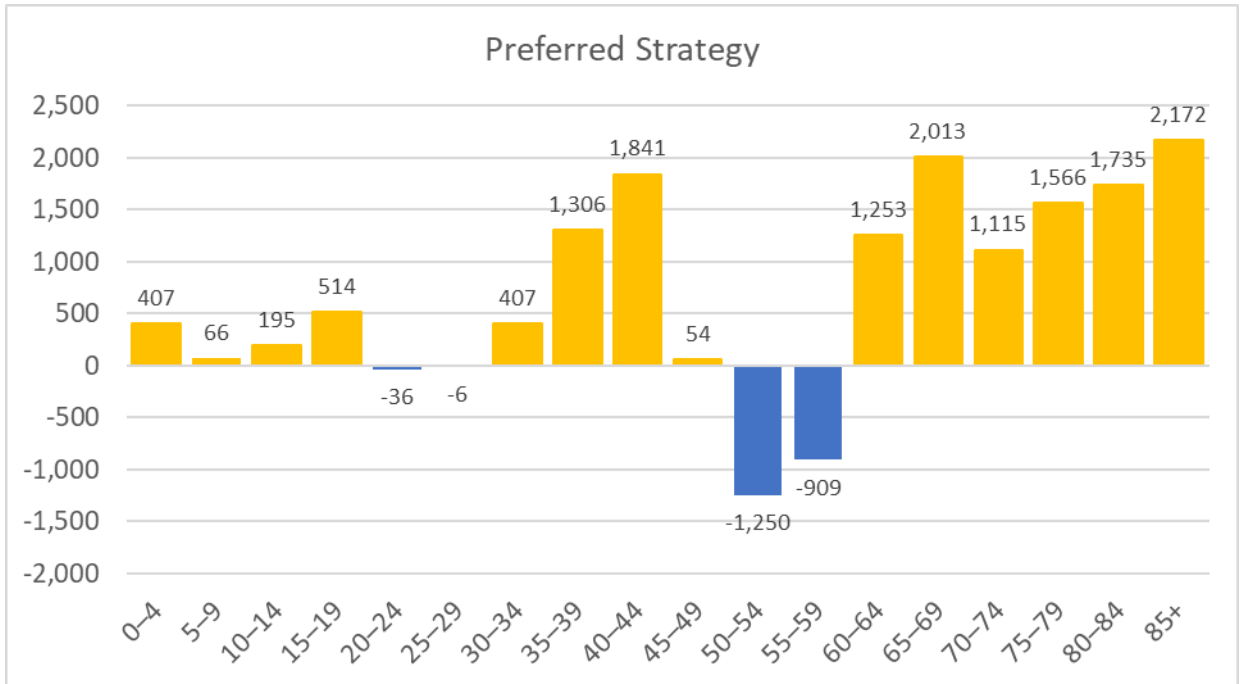
**RLDP Objective 9: Demography**

**Increase opportunities for the younger population to both live and work within Monmouthshire to assist in ensuring a balanced demography.**

- 3.28 Future Wales 2040 Policy 4 ‘Supporting Rural Communities’, seeks to achieve age balanced communities in rural areas. The policy states:

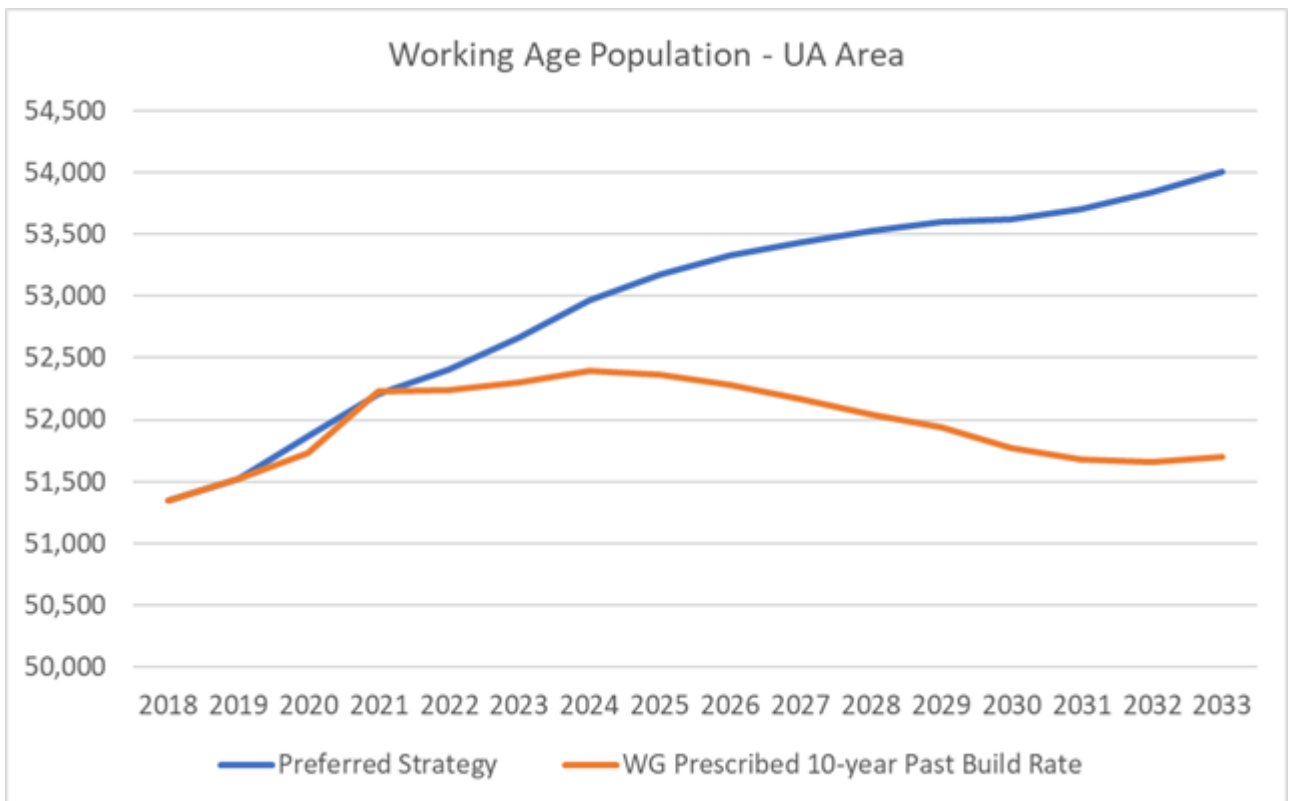
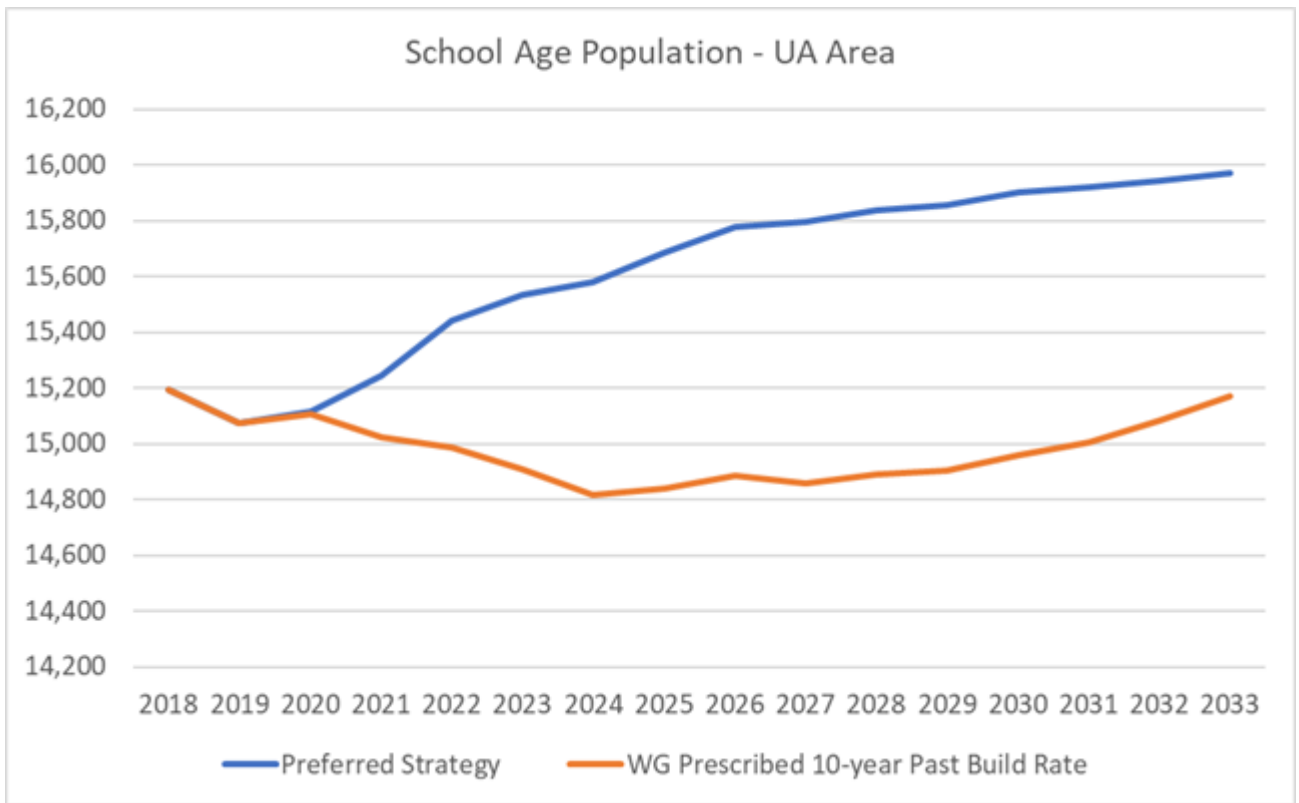
*“The Welsh Government supports sustainable and vibrant rural communities. Strategic and Local Development Plans must identify their rural communities, assess their needs and set out policies that support them. Policies should consider how age balanced communities can be achieved, where depopulation should be reversed and consider the role of new affordable and market housing, employment opportunities, local services and greater mobility in tackling these challenges.”*

3.29 The graphs below illustrate the impact on different age cohorts of the RLDP Preferred Strategy and the WG maximum growth level. The graph for the Preferred Strategy is based on the 2019 mid-year population estimates and covers the whole of Monmouthshire’s unitary authority area including the part within the Brecon Beacons National Park. This is because the Preferred Strategy proposes that Monmouthshire’s RLDP includes the growth for the part of the County within the National Park. The graph for the Welsh Government ten year past build rates is also based on the 2019 mid-year population estimates but covers only the Local Planning Authority area (i.e. excludes the National Park area). This is because the past build rates referred to are for the LPA area only.



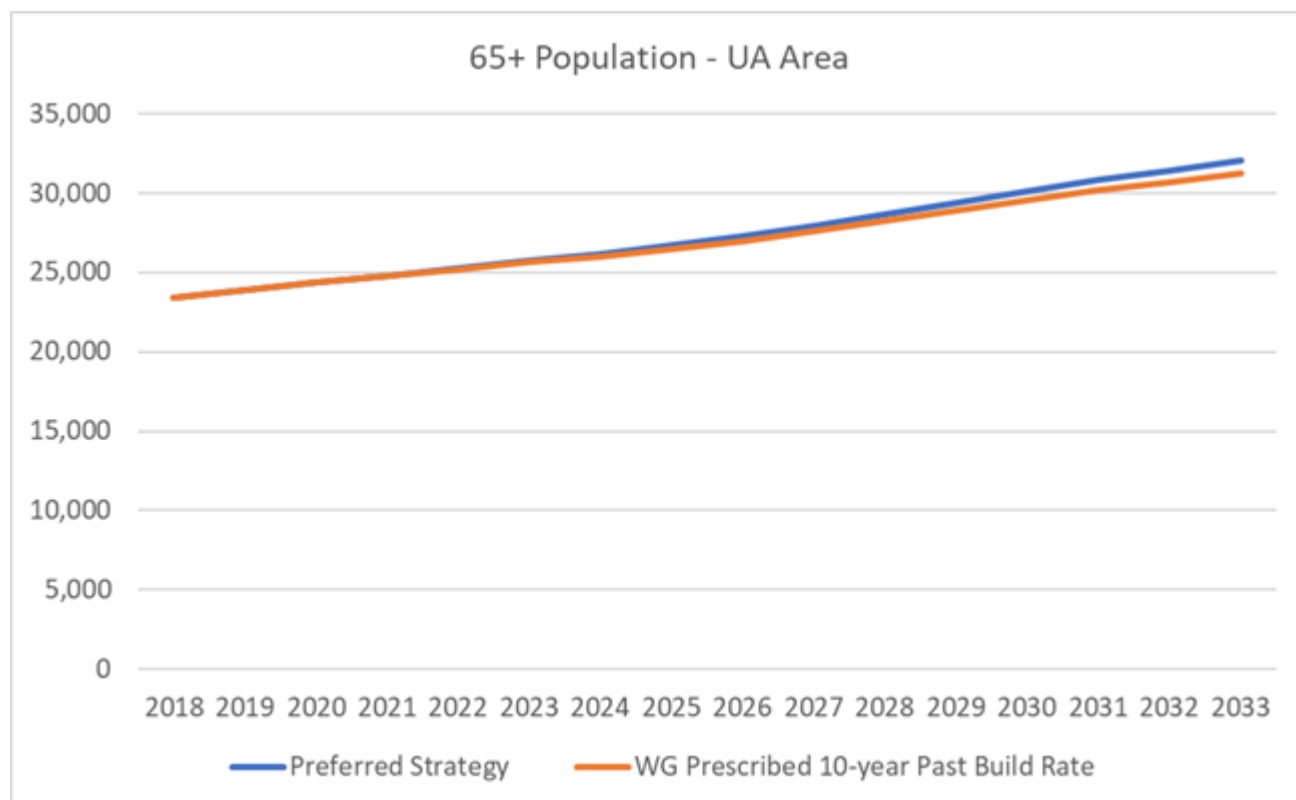


3.30 The graphs below compare the impact of the RLDP Preferred Strategy and the WG maximum growth level for the school age population (5-19 years), economically active population (20-64 years) and over 65s.



3.31 On 18th October 2021, [Economy Minister Vaughan Gethin](#) spoke of the ‘significant challenge’ of retaining and attracting talent to support the country’s economy. The Welsh Government is launching a drive to persuade more young people to remain in their homeland amid growing concerns that the percentage of working-age citizens is

dropping to worryingly low levels. Ministers fear that unless the “brain drain” is stopped – and more talented people can be attracted in – within a few decades the country may struggle to pay the bills to look after its ageing population.



- 3.32 The graph above shows the increase in the 65+ age groups is almost identical under both scenarios. The key factor for consideration is therefore the extent to which the remainder of the population is socially sustainable and able to support and care for the older people in our communities. Covid-19 has clearly demonstrated the strength of communities that have come together to volunteer and support the most vulnerable.
- 3.33 The Select Committee is invited to consider the extent to which the WG maximum growth level will address the objective of attracting and retaining younger people, increasing the economically active population and creating a more balanced demographic.

The implications of the Welsh Government’s maximum growth level of 4,275 homes on the economic prosperity of Monmouthshire’s communities

**RLDP Objective 1: Economic Prosperity**

**Support a thriving, well-connected, diverse economy, which provides a range of good quality employment opportunities to enable and encourage indigenous business growth and attract inward investment and competitive innovative businesses in appropriate growth sectors, including through the provision of start-ups and grow-on spaces.**

**RLDP Objective 12: Communities**

**To build sustainable resilient communities where people have good access to employment, shops, housing, public transport, active travel, healthcare, community and cultural facilities.**

**RLDP Objective 13: Rural Communities**

**Sustain existing rural communities as far as possible by providing development opportunities of an appropriate scale and location in rural areas in order to assist in building sustainable rural communities and strengthening the rural**

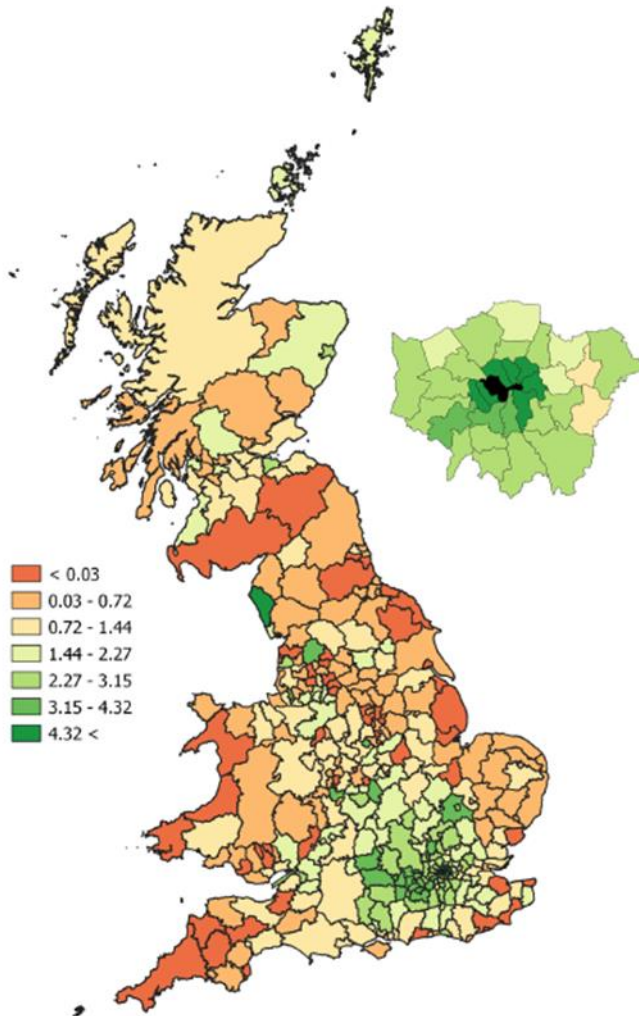
## economy.

- 3.34 The Welsh Government letter comments on the divergent economic evidence base presented and questions the deliverability of the 7,215 jobs identified in the Preferred Strategy. While the RLDP is just one tool in the Council's toolbox to assist with achieving the Council's economic ambition, we acknowledge that this aspect of the RLDP requires further work.
- 3.35 Future Wales Policy 5 'Supporting the Rural Economy', supports sustainable economic growth in rural towns. The policy states (emphasis added):  
*"The Welsh Government supports sustainable, appropriate and proportionate economic growth in rural towns that is planned and managed through Strategic and Local Development Plans. Strategic and **Local Development Plans must plan positively to meet the employment needs of rural areas** including employment arising from the foundational economy; the agricultural and forestry sector, including proposals for diversification; start ups and micro businesses. The Welsh Government also strongly supports development of innovative and emerging technology businesses and sectors to help rural areas unlock their full potential, broadening the economic base, and creating higher paid jobs."*
- 3.36 The UK Competitiveness Index 2021 is a measure of the long-run potential of localities, cities and regions to generate economic growth and well-paid employment. The November 2021 index takes account of the impacts of Brexit and Covid-19. Competitiveness is measured by analysing three factors:
- o Input Factors: Economic Activity Rates; Business Start-ups per 1,000 inhabitants; number of businesses per 1,000 inhabitants; proportion of working age population with NVQ Level 4 or higher; proportion of knowledge-based business.
  - o Output Factors: Gross Value Added per capita at current basic prices; Productivity – Output per hour worked; Employment Rates.
  - o Outcome Factors: Gross weekly pay; unemployment rates.
- 3.37 The ultimate aim of policy makers seeking to increase competitiveness should be to improve the welfare of their resident population, so this means increases in the UKCI are about the potential to increase employment and wages rather than shedding jobs and reducing wages to cut costs.
- 3.38 Monmouthshire is ranked 2<sup>nd</sup> in Wales and 147<sup>th</sup> in the UK for competitiveness (November 2021) compared to 3<sup>rd</sup> in Wales and 158<sup>th</sup> in the UK in 2018. Cardiff remains 1<sup>st</sup> in Wales and is now 133<sup>rd</sup> in the UK in whole of UK, up one place from its 2018 UK ranking. Blaenau Gwent remains the least competitive locality in UK, being least well-placed to withstand and recover from Covid-19. Merthyr Tydfil is 5<sup>th</sup> from bottom in the UK.
- 3.39 The November 2021 report goes on to consider the potential of a locality to provide a high level of living standards for its residents on an on-going basis, providing an insight into those localities with the greatest potential to generate high value jobs and production in the future. It does this by considering four different scenarios based on previous economic conditions reflecting what may happen depending on how the national and global economy respond to the current Brexit and Covid-19 challenges:
- o Boom – based on the 'boom' period prior to the Global Financial Crisis.
  - o Bust – of the 2008 Financial Crisis period itself.
  - o Recovery – characterised by limited productivity gains after the Financial Crisis.

- o Longer run – pattern over all these periods based on the OECD forecasts of growth for the UK over the next 20 years and how localities have performed over the longer run in the past.

The longer-run scenario shows Monmouthshire as ranked 1<sup>st</sup> in Wales and 114<sup>th</sup> in the UK.

FIGURE 8.01: LOCAL AUTHORITY GVA PER CAPITA PREDICTED GROWTH (LONG-RUN SCENARIO)



- 3.40 The Welsh Government’s maximum housing growth of 4,275 homes by 2033 would require the provision of 4,230 jobs. The graph at paragraph 3.30 above shows that the County’s economically active workforce would increase by 2,661 people between 2018 and 2033 under the Preferred Strategy, compared to an increase of 357 people under the WG maximum growth level.
- 3.41 The UKCI report identifies that the trends in competitiveness differences suggest that the economic levelling of the UK economy over the coming years is unlikely and can only be addressed through significant additional investment in the local areas of the UK that have been left behind.
- 3.42 Monmouthshire’s high levels of education and skills, high employment rates and broad base of small and medium enterprises place the County in a strong position to continue to thrive if enabled to do so, while much needed public sector investment is focussed on areas such as Blaenau Gwent. Conversely, an affordable housing crisis caused by constraining growth will see younger age cohorts priced out of the County and a shrinking economically active population base.

- 3.43 The Select Committee is encouraged to consider the extent to which the Welsh Government's maximum growth level for Monmouthshire would support Monmouthshire's role in the CCR as a competitive and investable county, would realise Monmouthshire's strategic border location and opportunities associated with the Western Gateway, and would support our rural economy and enable people to remain in their local communities.
- 3.44 The Select Committee is invited to consider whether or not the Welsh Government's desire to focus growth on Newport, Cardiff and the Valleys by limiting growth in Monmouthshire will achieve 'levelling up' or 'levelling down'.

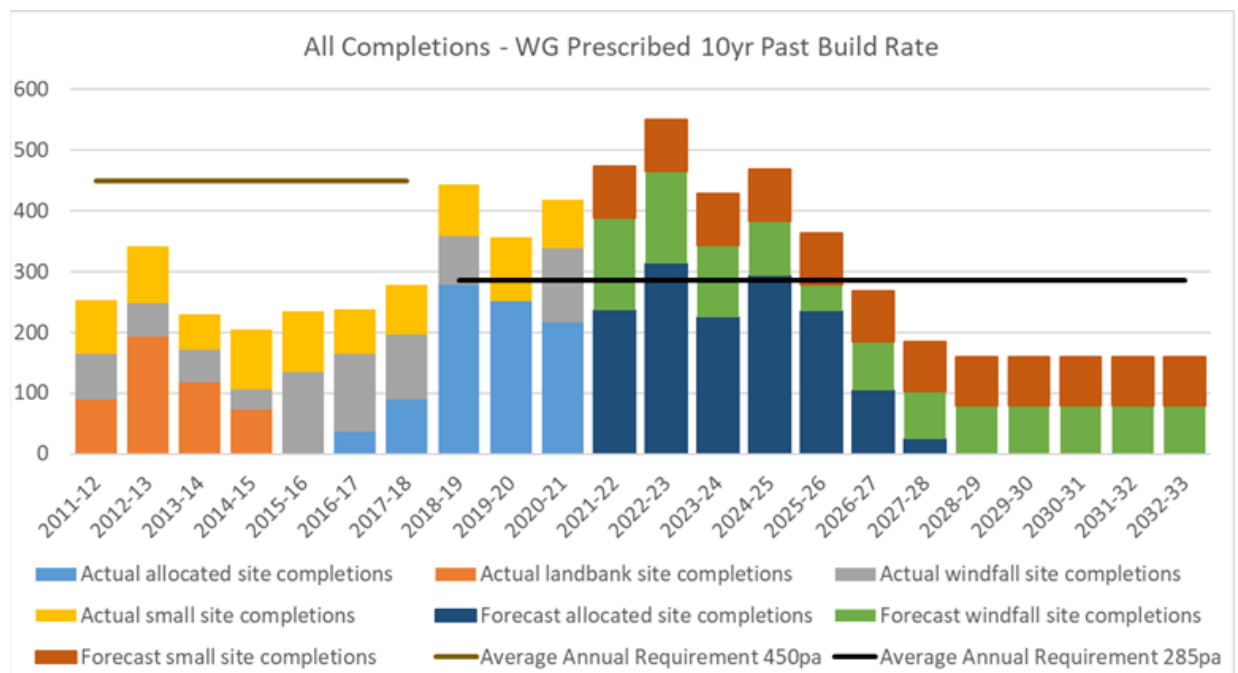
The appropriateness of WG prescribing a maximum growth level on a Local Planning Authority

- 3.45 The Sustainable and Resilient Communities Strategy is based on evidenced local needs, including issues identified via the consultation on the Local Wellbeing Plan.
- 3.46 Page 15 of Future Wales states that:  
*"Future Wales does not seek to take decisions that are most appropriately taken at the regional or local level. It provides strategic direction for all scales of planning and sets out policies and key issues to be taken forward at the regional scale. It does not seek to identify the exact location for new development or the scale of growth in individual settlements. The regional and local tiers are the most appropriate level at which to take these decisions, involving communities as they do so."*
- 3.47 The Select Committee is invited to consider whether or not the Welsh Government's desire to focus growth on Newport, Cardiff and the Valleys by limiting growth in Monmouthshire addresses the wellbeing of Monmouthshire's communities, including the wellbeing of future generations.

The appropriateness of using past build rates

- 3.48 The WG dwelling requirement of 4,275 is based on the past 10-year build rate in the County (i.e. 15 years x 285 dwellings per annum). The Select Committee is invited to consider the appropriateness of using past build rates to determine our future levels of growth.
- 3.49 In some areas of Wales, particularly where development viability is marginal, past build rates can give a helpful indication of what the development industry is able to realistically deliver. However, in an area like Monmouthshire, past build rates are primarily a factor of how much land previous Development Plans have allocated, and therefore how much development has been allowed. Fluctuations in build rates can be mapped against UK-wide economic cycles (such as the 2008 economic downturn) and Development Plan delivery cycles, with a drop as Plans are delivered until the new Plan is adopted. Consequently, past build rates simply replicate what has been allowed to happen in the past. It's essentially 'planning forwards, looking backwards'.
- 3.50 The Welsh Government's Development Plans Manual (Edition 3, March 2020) paragraph 5.57 notes: *'Just relying on past build rates as the sole evidence base to quantify future employment and housing land requirements is not sufficient on its own. Additional evidence will be required to identify the scale of new jobs and homes necessary and the related land requirement'*.
- 3.51 The 10-year past build rates used by WG includes a period constrained by the aftermath of the 2008 economic recession as well as the preparation of the current LDP to replace the previous UDP. These factors artificially deflate the numbers. Our

AMRs clearly indicate that the past 5 years are more reflective of reality as LDP allocated sites are delivered, and unconstrained by external influences. The graph below shows past build rates (dwelling completions per annum) back to 2011 together with the projected build rates from the Housing Land Availability Schedule which identifies all sites that will realistically come forward with completed dwellings each year over the next five years. The number of homes already completed since 2018, plus the number consented and realistically being delivered over the next five years to 2026 exceeds the 285 dwellings per annum 10-year average past build rate resulting in an over-delivery of 433 homes by 2033 simply through the past trend of windfall sites. The graph below shows the different components of housing delivery: both housing delivery since the start of the RLDP Plan period and the agreed trajectory of house building over the next five years far exceeds the ten year past build rate, illustrating that it is not an appropriate methodology for planning the future.



3.52 The Select Committee is invited to consider the pros and cons of the two methodologies, namely the use of past build rates for the last ten years or the Preferred Strategy’s population-led scenario with added assumptions in relation to household formation rates and commuting to specifically address evidence-based key local issues around demography and housing affordability and the extent to which the Council’s objectives are achieved.

General conformity with Future Wales 2040

3.53 One of the tests of soundness against which the independent inspector will examine our RLDP is its general conformity with Future Wales 2040. Future Wales 2040 was published by the Welsh Government in February 2021 and it is now a statutory Development Plan. The requirement for general conformity with FW2040 is also set out in the Planning (Wales) Act 2015<sup>6</sup>.

3.54 The Welsh Government’s response to the RLDP Preferred Strategy states:  
*“To be considered to be in general conformity with Future Wales the Monmouthshire RLDP must provide for a lower level of housing. The WG principal housing projection for the plan area, 2,610 units, provides a starting*

<sup>6</sup> Section 6 of the Planning (Wales) Act 2015 inserts section 60I into the PCPA 2004. Sub-section 3A states that an SDP must be in general conformity with the NDF. Section 62(3A) of the Planning (Wales) Act 2015 inserts section 62(3A) into the PCPA 2004 which states that an LDP must be in general conformity with the NDF and the SDP

*point for the level of housing required. In recognition of build rates achieved over the last 10 years, a higher level of housing may be justified. The proposed level of housing growth should however be no greater than 4,275 units (15 x the 10 year build rate) plus an appropriate flexibility allowance. This will ensure that Monmouthshire continues grow in a sustainable manner based on a locally appropriate level of development which is compatible with policies 1 and 33 of Future Wales”*

3.55 Policy 1 (Where will Wales grow) of FW2040 states:

*“The Welsh Government supports sustainable growth in all parts of Wales. In three National Growth Areas there will be growth in employment and housing opportunities and investment in infrastructure. The National Growth Areas are:*

- Cardiff, Newport and the Valleys*
- Swansea Bay and Llanelli*
- Wrexham and Deeside*

*The National Growth Areas are complemented by Regional Growth Areas which will grow, develop and offer a variety of public and commercial services at regional scale. There are Regional Growth Areas in three regions:*

- The South West*
- Mid Wales*
- The North*

*Development and growth in towns and villages in rural areas should be of appropriate scale and support local aspirations and need.”*

3.56 The supporting text at page 64 of FW2040 states (emphasis added):

*“Beyond the National and Regional Growth Areas are a mix of smaller towns and villages and large areas of countryside. Many towns are traditionally market towns and have retained the function of being gathering places for people living and working in rural places...**Development in towns and villages in rural areas will support local aspirations and need, complementing rather than competing with efforts to grow our cities and towns. Policies 4 and 5 are particularly relevant in these places.***

*By focusing large scale growth on the urban areas, development pressures can be channelled away from the countryside and productive agricultural land can be protected. Rural areas have an important function as providers of food, energy and mineral resources. **Communities in rural areas are strongly supported; the aim is to secure sustainable economic and housing growth which is focused on retaining and attracting working age population and maintaining and improving access to services.** In areas designated for their landscape or ecological importance, protection against inappropriate development remains in place.*

***The spatial strategy empowers local policy and decision-makers to develop the national priorities through Strategic and Local Development Plans and identify areas and issues of significance to their particular areas.”***

3.57 Policy 33 (National Growth Area – Cardiff, Newport and the Valleys) of FW2040 states (emphasis added):

*“Cardiff, Newport and the Valleys will be the main focus for growth and investment in the South East region. **Strategic and Local Development Plans should recognise the National Growth Area as the focus for strategic economic and housing growth; essential services and facilities; advanced manufacturing; transport and digital infrastructure.***



*The Welsh Government will work with regional bodies and local authorities in the region and in neighbouring regions of England to promote and enhance Cardiff, Newport and the Valleys' strategic role and ensure key investment decisions support places in the National Growth Area and the wider region.*

*The Welsh Government supports Cardiff's status as an internationally competitive city and a core city on the UK stage. Cardiff will retain and extend its role as the primary national centre for culture, sport, leisure, media, the night time economy and finance.*

*The Welsh Government supports an increased strategic role for Newport as a focus for sustainable, long-term growth and investment. The Welsh Government will work with authorities within the region and in England to promote Newport's strategic role and ensure key investment decisions in Wales and England support Newport.*

*The Welsh Government supports co-ordinated regeneration and investment in the Valleys area to improve well-being, increase prosperity and address social inequalities. The Welsh Government will work with regional bodies, local authorities, businesses, the third sector, agencies and stakeholders to support investment, including in the manufacturing sector, and to ensure a regional approach is taken to addressing socio-economic issues in the Valleys.*

***The Welsh Government supports development in the wider region which addresses the opportunities and challenges arising from the region's geographic location and its functions as a Capital Region.***

3.58 The supporting text at page 162 states that:

*"The region should consider its connections with the Mid Wales and South West regions and the West of England region. Promoting accessibility and inter-linkages between these areas, based on an understanding of their roles and functions, will ensure these areas operate as a cohesive whole and do not compete against each other or take strategic decisions in isolation."*

3.59 Of particular relevance here is the reference to FW2040 directing nationally significant growth while recognising the needs of rural areas within the region. The supporting text at page 167 states that:

*"The rural areas of the South East, whilst lying in relatively close proximity to major towns and cities, will be supported by policies 4 and 5 in order for these communities to be sustained for the long term."*

3.60 It is a well-established principle that Development Plans must be read as a whole, and logic would suggest that this same principle applies to Future Wales 2040. Consequently, the Select Committee is invited to consider the extent to which the RLDP Preferred Strategy is in general conformity with the whole of Future Wales 2040, rather than merely policies 1 and 33.

3.61 In this regard, the eleven Future Wales outcomes (pages 54-56) are of relevance together with some of the supporting text, reproduced below:

- 1) A Wales where people live and work in connected, inclusive and healthy places;
- 2) A Wales where people live in vibrant rural places with access to homes, jobs and services;
- 3) A Wales where people live in distinctive regions that tackle health and socio-economic inequality through sustainable growth;
- 4) A Wales where people live in places with a thriving Welsh language;
- 5) A Wales where people live and work in towns and cities which are a focus and springboard for sustainable growth;



- 6) A Wales where people live in places where prosperity, innovation and culture are promoted;
- 7) A Wales where people live in places where travel is sustainable;
- 8) A Wales where people live in places with world-class digital infrastructure;
- 9) A Wales where people live in places that sustainably manage their natural resources and reduce pollution;
- 10) A Wales where people live in places with biodiverse, resilient and connected ecosystems;
- 11) A Wales where people live in places that are decarbonised and climate-resilient.

3.62 Of note, the supporting text to outcome 1 states that:

*“Our cities, towns and villages will be physically and digitally well connected places, offering good quality of life to their residents. High quality homes meeting the needs of society will be well located in relation to jobs, services and accessible green and open spaces. Places will meet and suit the needs of a diverse population, with accessible community facilities and services.”*

3.63 Of note, the supporting text to outcome 2 states that:

*“In rural areas, job opportunities and community services will be supported to help attract and retain people. A balance will be found between development and preserving the character of rural Wales, ensuring our small towns and villages have bright futures as attractive places to live and work. The rural economy will be thriving and communities will be well connected digitally and physically. There will be support for the agricultural sector and its supply chains to boost resilience through diversification.”*

3.64 Of note, the supporting text to outcome 6 states that (emphasis added):

***“Development plans will have a forward thinking, positive attitude towards enabling economic development, investment and innovation. Increased prosperity and productivity will be pursued across all parts of Wales, building on current activity and promoting a culture of innovation, social partnership, entrepreneurialism and skills-development in sustainable industries and sectors. The culture, heritage and environment of Wales will play a positive, modern role in the economy by attracting the interest and expenditure of tourists and providing a distinctive and trusted brand for Welsh businesses.”***

3.65 Future Wales Policies 4, 5 and 7 are considered to be of particular significance and are quoted below for ease of reference.

3.66 Future Wales Policy 4 ‘Supporting Rural Communities’ seeks to achieve age balanced communities in rural areas, and states:

*“The Welsh Government supports sustainable and vibrant rural communities. Strategic and Local Development Plans must identify their rural communities, assess their needs and set out policies that support them. Policies should consider how age balanced communities can be achieved, where depopulation should be reversed and consider the role of new affordable and market housing, employment opportunities, local services and greater mobility in tackling these challenges.”*

3.67 Future Wales Policy 5 ‘Supporting the Rural Economy’ supports sustainable economic growth in rural towns, and states:

*“The Welsh Government supports sustainable, appropriate and proportionate economic growth in rural towns that is planned and managed through Strategic and Local Development Plans. Strategic and Local Development Plans must*

*plan positively to meet the employment needs of rural areas including employment arising from the foundational economy; the agricultural and forestry sector, including proposals for diversification; start ups and micro businesses. The Welsh Government also strongly supports development of innovative and emerging technology businesses and sectors to help rural areas unlock their full potential, broadening the economic base, and creating higher paid jobs.”*

3.68 Future Wales Policy 7 ‘Delivering Affordable’ Homes seeks to increase the delivery of affordable and states:

*“The Welsh Government will increase delivery of affordable homes by ensuring that funding for these homes is effectively allocated and utilised. Through their Strategic and Local Development Plans planning authorities should develop strong evidence-based policy frameworks to deliver affordable housing, including setting development plan targets based on regional estimates of housing need and local assessments. In response to local and regional needs, planning authorities should identify sites for affordable housing led developments and explore all opportunities to increase the supply of affordable housing.”*

3.69 In addition to paragraph 3.59 above, Select Committee is invited to consider whether the Preferred Strategy growth level would significantly undermine Future Wales’ desire to focus growth in Cardiff, Newport and the Valleys (policies 1 and 33). Is the additional 3,330 homes (222 dwelling per annum) (i.e. the difference between the Preferred Strategy growth level 7,605 and the WG maximum growth 4,275) so significant in a regional context over a 15 year plan period that the national growth area is undermined?

#### The tests of soundness

3.70 The RLDP will be examined by an independent inspector during a formal examination process. As part of this, local planning authorities will need to demonstrate that the plan meets the tests of soundness set out in the Development Plans Manual (Edition 3, March 2020) (Appendix 4).

3.71 Select Committee is invited to consider the extent to which the Welsh Government’s maximum growth level set out by the Welsh Government would result in a Plan that is sound in relation to soundness test 2 in that:

- the Plan is locally specific;
- the level of growth would address the key evidence-based local issues;
- the Plan is supported by robust, proportionate and credible evidence;
- the Plan would meet assessed needs and contribute to sustainable development;
- the Plan’s vision and strategy are positive and sufficiently aspirational. .

3.72 The RLDP needs to deliver on the evidence base, vision and objectives and align with the Council’s overall core purpose to build sustainable and resilient communities. It should address key local issues such as affordability and demographic balance while addressing the climate emergency. The Select Committee is encouraged to consider the WG maximum level of growth would achieve the Council’s evidence-based objectives.

## Next Steps

- 3.73 In view of the implications associated with the WG's consultation response to the RLDP Preferred Strategy, specifically the Welsh Government's maximum dwelling requirement, further consideration must be given as to how to progress the RLDP Preferred Strategy. A future report to Council will present options for progressing the RLDP and will seek a Council decision on how to proceed.

## **4. EQUALITY AND FUTURE GENERATIONS EVALUATION (INCLUDES SOCIAL JUSTICE, SAFEGUARDING AND CORPORATE PARENTING):**

- 4.1 The Planning and Compulsory Purchase Act (2004) sets out the requirement for all LDPs to be subject to a Sustainability Appraisal (SA). All stages of the RLDP will be subject to an Integrated Sustainability Assessment (ISA) (including Strategic Environmental Assessment (SEA), Well-being of Future Generations (WBFG), Health Impact Assessment (HIA), Equality Impact Assessment (EqIA), and Welsh Language Impact Assessment (WLIA)). The ISA findings have informed the development of the RLDP strategy and strategic policies, and will be used to inform detailed policies and site allocations in the Deposit Plan, in order to ensure that the Plan will promote sustainable development. The Initial ISAR was published alongside the Preferred Strategy.

### Safeguarding and Corporate Parenting

- 4.2 There are no safeguarding or corporate parenting implications arising directly from this report. The RLDP has the potential to provide affordable housing, delivery and allocation of which should be cognisant of the needs of children leaving care. The WG Welsh Government's dwelling requirement would seriously thwart the Council's ability to deliver affordable housing for our current and future generations.

### Socio-economic Duty

- 4.3 The RLDP Preferred Strategy seeks to tackle house price unaffordability, which currently prevents some of our communities accessing suitable housing within the County. This is likely to benefit younger people in particular, which in turn will make our ageing communities more socially sustainable. Good quality and affordable housing is important in achieving poverty reduction and equitable prosperity, and supporting the best start in life. Good spatial planning helps to build cohesive communities. The provision of affordable housing, combined with policy interventions in relation to the requirement of a mix of market housing, will increase opportunities for those in poverty to access safe, secure and suitable housing. In accordance with the WBFGA, the RLDP also seeks to prevent future problems and will therefore continue to avoid new development in flood risk areas and will seek low/zero carbon development to help address the climate emergency and also tackle issues such as fuel poverty. A dwelling requirement based on WG's maximum figure would hinder the Council's ability to effectively tackle housing affordability and associated issues across the County with resultant socio-economic impacts.

## 5. OPTIONS APPRAISAL

Option	Benefit	Risk	Comment
Economy and Development Select Committee consider and comment, as appropriate, on the implications for the County of WG's consultation response to the RLDP Preferred Strategy, specifically the Welsh Government's maximum dwelling requirement.	This provides the Economy and Development Select Committee with the opportunity to consider the implications for the County of WG's consultation response to the RLDP Preferred Strategy, specifically the Welsh Government's maximum dwelling requirement.		This is the preferred option.  It is essential that members are made aware of, and have the opportunity to consider, the implications associated with WG's Welsh Government's dwelling requirement for the RLDP as set out in the consultation response to the RLDP Preferred Strategy.
Economy and Development Select Committee do not comment on the implications for the County of WG's consultation response to the RLDP Preferred Strategy, specifically the Welsh Government's maximum dwelling requirement.		The option of not commenting on WG's consultation response to the RLDP Preferred Strategy, specifically the Welsh Government's maximum dwelling requirement, would result in the Economy and Development Select Committee missing a key opportunity to consider the implications of the Welsh Government's dwelling requirement for the County and shape the RLDP.	The option of not commenting on WG's consultation response to the RLDP Preferred Strategy would result in the Economy and Development Select Committee missing a key opportunity to consider the implications of the Welsh Government's dwelling requirement for the County and should, therefore, be discounted.

## 6. RESOURCE IMPLICATIONS

- 6.1 Officer and consultant time and costs associated with the preparation of the Preferred Strategy will be met from the Planning Policy budget.

## 7. CONSULTEES

- Enterprise DMT
- SLT
- Member workshop 12<sup>th</sup> October 2021

## 8. BACKGROUND PAPERS

- RLDP Preferred Strategy (June 2021)
- Initial Integrated Sustainability Appraisal Report (AECOM, June 2021)
- HRA of the Monmouthshire RLDP Preferred Strategy (AECOM, June 2021)
- RLDP Delivery Agreement (Second Revision, October 2021)

- Sustainable Settlements Appraisal (June 2021)
- Growth and Spatial Options Report of Consultation (June 2021)
- Growth and Spatial Options Background Paper (June 2021)
- Housing Background Paper (June 2021)
- Review of Candidate Sites against the Preferred Strategy (June 2021)
- Monmouthshire Employment Land Review (BE Group, June 2021)
- Issues, Vision and Objectives Paper (Updated June 2021)
- Growth and Spatial Options Paper (December 2020)
- Monmouthshire RLDP Updated Demographic Evidence Report (Edge Analytics, November 2020)
- Monmouthshire Affordable Housing Report (Edge Analytics, November 2020)
- Review of RLDP Issues, Vision and Objectives and Evidence Base in Light of Covid-19 (September 2020)
- Monmouthshire 2040: Our Economic Growth and Ambition Statement (November 2019) and supporting MCC Economies of the Future Reports (2018)
- Candidate Sites Register (February 2019)
- Local Housing Market Assessment (September 2018)
- LDP Annual Monitoring Reports (2014-2021)

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**APPENDICES:**

**APPENDIX 1: Letter from Minister for Climate Change, Julie James, 8th July 2019**

**APPENDIX 2: Letter from Minister for Climate Change, Julie James, 17<sup>th</sup> November 2021**

**APPENDIX 3: Welsh Government Consultation Response to the RLDP Preferred Strategy, August 2021**

**APPENDIX 4: Tests of Soundness**

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## APPENDIX 6

Julie James AC/AM  
Y Gweinidog Tai a Llywodraeth Leol  
Minister for Housing and Local Government



Llywodraeth Cymru  
Welsh Government

Ein cyf/Our ref: MA/P/JJ/1514/19

Leaders and Chief Executives of Local Authorities

8 July 2019

Dear Colleague,

At this year's RTPI Wales Planning Conference, I outlined that the Welsh Government is committed to diversifying housing supply in Wales with the need to focus attention on the delivery of social housing. This position is supported by the findings of the Independent Review of Affordable Housing Supply and the recently published estimates of housing need in Wales by tenure. I also said that, as a result, we intend updating Planning Policy Wales (PPW). This letter sets out my expectations of development plans for the delivery of social housing in advance of changes to PPW.

Good progress has been made towards delivering our target of 20,000 affordable homes, however evidence shows we need to build more social homes. We recognise the important contribution which market housing makes to providing affordable housing, but over the last 40 years house building output has only attained the levels of need when councils built and managed substantial numbers of social homes.

The published estimates of housing need in Wales by tenure provide a range of estimates based on different demographic projections for the next 5 years. The central estimate of housing need suggests an additional 4,400 market houses and 3,900 affordable homes are needed each year. In other words, 47 per cent of the homes we need in Wales should be for social or intermediate rent. Given these estimates, and based on average new house-building statistics for the past few years, it appears that we are already building the number of market homes we need, whilst we are falling short of the number of affordable homes we desperately require. The public sector must accept the challenge and step in to ensure that everyone who needs a home has a home.

One area where the prospects for social housing have been transformed is the opportunity which now exists for local authorities to build again. The Welsh Government is determined to support the building of a new generation of council homes at scale and pace to meet the needs of communities across Wales. The direct provision of social housing requires concerted effort across the public sector. There are examples of good practice emerging across Wales where local authorities have, by extending their borrowing, begun the task of

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We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.



building new council houses. The availability of well located affordable land is critical to the success of this policy.

Up to date Local Development Plans (LDPs) are a cornerstone for housing delivery by identifying the best sites for new homes. Local planning authorities must, when complying with their statutory duty to prepare LDPs, address the need for affordable housing.

LDPs must be informed by evidence including the estimates of housing need in Wales by tenure and Local Housing Market Assessments which together identify the type and tenure of housing required. The most recent version of PPW, published last December, requires local planning authorities to follow place-making principles. Place-making is a people-centred approach to planning, designing and managing communities to promote peoples' health, happiness and well-being which must be central to preparing LDPs and deciding planning applications. PPW already allows local planning authorities to identify sites for up to 100% affordable housing. Whilst PPW also states that such sites are likely to be small in scale and number in relation to the total number of sites available, the need for social housing is now so acute that this policy needs to be implemented in a flexible way to reflect local circumstances. PPW will be updated to reflect the revised policy as part of the current review of the delivery of housing through the planning system.

When reviewing LDPs local planning authorities must make provision for affordable housing led housing sites. **Such sites will include at least 50% affordable housing, which is defined as social rented housing provided by local authorities and registered social landlords, and intermediate housing where prices or rents are above those of social rent but below market levels and there are secure arrangements to recycle receipts to use for future affordable housing where full ownership is achieved.** In the first instance affordable housing led housing sites should make use of public land. Where public land is not available, privately owned land may be identified. Sites should not be inferior in any way to sites which are being promoted for market housing.

Yours sincerely,



**Julie James AC/AM**

Y Gweinidog Tai a Llywodraeth Leol  
Minister for Housing and Local Government

CC Heads of Planning Service  
Heads of Housing Service

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Eich cyf/Your ref  
Ein cyf/Our ref

Leaders and Chief Executives of Local Authorities

17 November 2021

Dear Colleague,

We have set an ambitious and challenging target of delivering 20,000 new affordable homes for social rent during this Senedd term. We recognise the important contribution that market housing makes in supporting the provision of affordable housing, but over the last 40 years house building output has only attained the levels of need when councils built and managed substantial numbers of social homes.

The published estimates of housing need in Wales by tenure provide a range of estimates based on different demographic projections for the next 5 years. Based on average new house building statistics for the past few years, it appears that we are already building the number of market homes we need, whilst we are falling short of the number of affordable homes we desperately require. The public sector must accept the challenge and step in to ensure that everyone who needs a home has a home.

One area where the prospects for social housing have been transformed is the opportunity which now exists for local authorities to build again. The Welsh Government is determined to support the building of a new generation of council homes at scale and pace to meet the needs of communities across Wales. The direct provision of social housing requires concerted effort across the public sector. There are examples of good practice emerging across Wales where local authorities have, by extending their borrowing, begun the task of building new council houses. The availability of well located affordable land is critical to the success of this policy.

Up to date Local Development Plans (LDPs) are a cornerstone for housing delivery by identifying the best sites for new homes. Local Planning Authorities (LPAs) must, when complying with their statutory duty to prepare LDPs, address the need for affordable housing. Our national planning policy makes it clear that when reviewing LDPs, LPAs must make provision for affordable housing led housing sites. Such sites will include at least 50% affordable housing, which is defined as social rented housing provided by local authorities and registered social landlords, and intermediate housing where prices or rents are above those of social rent but below market levels and there are secure arrangements to recycle receipts to use for future affordable housing where full ownership is achieved. In the first instance affordable housing led housing sites should make use of public land. Where public

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Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

land is not available, privately owned land may be identified. Sites should not be inferior in any way to sites which are being promoted for market housing.

The Welsh Government's Land Division has been established to promote joint working between public sector bodies to unlock the potential of our public land for development. It is tasked to ensure we make the best use of the resources available, and provide a mechanism for sharing expertise so that we can see a concerted public sector response to the shortage of social housing, and to the development of public land for wider policy benefit.

Land Division is seeking to utilise these assets to support housing policy objectives, including the increased provision of social housing across Wales. In addition, developments will align to our social housing space standards, increasing public housing stock numbers whilst also taking opportunities to deliver new net zero carbon developments. We will also be pressing for innovative designs, encourage greater biodiversity and make greater use of Modern Methods of Construction, building on the experience gained through the Innovative Housing Programme.

Our Land and Building Development Fund (LBDF) can provide Local Authorities and Registered Social Landlords with a proportion of the costs associated with advancing land and/or buildings for the development of social and affordable homes. It can be used to fund the viability gap that may arise when delivering the 50% target. If you have not already done so, I would urge you to consider a scheme(s) for your Local Authority areas, and investigate what land or assets you have that could be repurposed or advanced for the development of social and affordable homes. Land Division officials stand ready to assist you with any proposals you may wish to be considered for the scheme.

Another area where we can work together to deliver more affordable social homes is on land that has been remediated under historic Land Reclamation Grants, where the Welsh Government is due all or a proportion of the land receipts following a sale. In these circumstances I'm clear that ensuring we deliver the best possible development which meets our wider policy objectives, including 50% affordable, low carbon social homes takes precedent over maximising receipts for the Welsh Government. I would urge you to contact my officials and work with them to ensure this request is realised on sites in future.

Yours sincerely



**Julie James AS/MS**  
Y Gweinidog Newid Hinsawdd  
Minister for Climate Change



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

27 August 2021

Dear Mark

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

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

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

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

After considering the key issues and policies in Future Wales, the **Preferred Strategy, as presented in relation to the scale of growth, is not in general conformity with Future Wales: The National Development Framework**. Specific comments are set out in the **Statement of General Conformity** (Annex 1 to this letter) with additional guidance contained in the Development Plans Manual (3<sup>rd</sup> Edition, March 2020) – 'the DPM'.

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

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

It is very disappointing that key background documents on issues including Strategic Site delivery, a high-level/site-specific viability appraisal, a Renewable Energy Assessment and Gypsy and Traveller Assessment have not been completed to 'front load' the process and inform findings in the Preferred Strategy. A robust evidence base is critical to fully understand the plan.

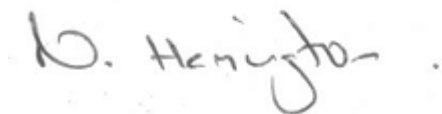
Our representation includes more detailed issues set out in Annex 1 and Annex 2 to this letter. Collectively, our comments highlight a range of issues that need to be addressed for the plan to be considered 'sound'. The key areas include:

- Housing and economic growth levels
- Affordable housing policy-on approach
- Site delivery/implementation, including financial viability
- Phosphates and nutrient neutrality
- Gypsy and Traveller Accommodation
- Minerals

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

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

Yours sincerely



**Neil Hemington**  
**Chief Planner Welsh Government**

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

For matters relating to Local Development Plan procedures please contact: [Planning.Directorates@gov.wales](mailto:Planning.Directorates@gov.wales)

## Statement of General Conformity

The Welsh Government has very significant concerns regarding the Monmouthshire LDP Preferred Strategy. Future Wales places great emphasis on the development of National Growth Areas. The Preferred Strategy is not in general conformity with Policies 1 and 33 of Future Wales and undermines the role of Cardiff, Newport and the Valleys as the main focus for growth and investment in the South East region.

### Reasons

The Welsh Government acknowledges the work the local authority has undertaken in developing the Preferred Strategy, which includes consideration of a number of growth and spatial options. However, there is fundamental concern about the impact of the chosen growth option of 7,215 new jobs and 7,605 homes on the South East region as defined in Future Wales.

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

With regard to housing, the level of housing proposed is 4,740 units above the Welsh Government 2018-based principal household projection of 2,865 homes. The housing requirement is based on data for Monmouthshire County Council as a whole and includes land within the Brecon Beacons National Park Authority (BBNPA). The WG principal projection for the plan area, minus BBNPA area, is 2,610 units which means that the Preferred Strategy is actually some 4,995 dwellings above the WG 2018 principal projection. The proposed level of housing growth (507 dpa) is also very significantly above the past 5 and 10-year build rates (310 and 285 pa respectively).

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

The level of growth proposed has the potential to negatively impact on environmental assets and have adverse consequences for climate and nature emergencies. This is heightened by the absence of brownfield land development opportunities and the consequential need to identify significant green field sites for development.

There are major regional strategic impacts arising from the level of growth proposed. Displacement of population, housing and jobs from elsewhere in the region to Monmouthshire will occur. This will hinder regeneration and the take up of brownfield land for development in the National Growth Area.

To be considered to be in general conformity with Future Wales the Monmouthshire RLDP must provide for a lower level of housing. The WG principal housing projection for the plan area, 2,610 units, provides a starting point for the level of housing required. In recognition of build rates achieved over the last 10 years, a higher level of housing may be justified. The proposed level of housing growth should however be no greater than 4,275 units (15 x the 10 year build rate) plus an appropriate flexibility allowance. This will ensure that Monmouthshire continues grow in a



sustainable manner based on a locally appropriate level of development which is compatible with policies 1 and 33 of Future Wales.

There are also significant reservations about proposed levels of employment growth which are set out fully in Annex 2.

It is positive that the Strategy recognises the importance of biodiversity enhancement with language such as “must maintain, protect and enhance.” As well as highlighting ranges of opportunities such as minimum garden standards and planting in public realm spaces. However, the statement *the RLDP must ensure biodiversity is considered in any development in order to protect any interest on the site and encourage biodiversity enhancements where necessary* should be stronger. As outlined in Future Wales Policy 9 – Resilient Ecological Networks and Green Infrastructure, rather than encourage biodiversity enhancements where necessary, biodiversity enhancements must be considered in all development and the enhancements should be proportionate in size and scale to the development.

Future Wales identifies a Green Belt to the north of Cardiff, Newport and the eastern part of the region and is clear that LDPs should not permit major development in areas shown for consideration as Green Belts, except in very exceptional circumstances. This is until the need for Green Belts and their boundaries has been established by an adopted Strategic Development Plan. Although the areas identified for growth in the Preferred Strategy fall outside of the indicative Green Belt boundary and national planning policy allows for extensions to existing settlements within and adjoining the Green Belt of an appropriate scale, there should be no ambiguity about the need to protect land elsewhere.

The additional comments below are intended to provide assistance to the authority and ensure the plan and supporting evidence better aligns with the requirements in the National Development Framework (NDF):

- **Strategic Policy S3** - ‘promote’ in clauses 2 and 3 is a weak word. A stronger approach is encouraged.
- **Strategic Policy SP4** sets the right tone, but the concern is that ‘positive impact’ will be subject to too much debate and won’t achieve significant impacts. The list of methods in the policy shouldn’t be in the policy text.
- **Strategic Policy S5** regarding infrastructure provision uses the term ‘delivered in phase with proposed development’. PPW states for active travel infrastructure - ‘should be prioritised and put in place from the outset’. This policy should be strengthened to be clear what ‘in phase’ means.
- **Strategic Policy S12** uses the term ‘within or adjoining town and village development boundaries subject to detailed planning considerations’. The supporting text should include reference to the town centre first approach.

**Strategic Policy S10** – this policy should take into account Llwybr Newydd and should also address reducing parking levels and refer to rural transport issues including the provision of EV charging.

- **Strategic Policy S11** – suggests that retailing will remain the predominant land use focus in town centres. The emphasis should be switched to overall town centre health/vibrancy, rather than retail hierarchy, to ensure a more effective approach.



## **Annex 2** to Welsh Government Letter dated 27 August 2021 in response to Monmouthshire County Council's Replacement LDP – Preferred Strategy

### **Phosphates**

Following NRW's publication of updated guidance relating to phosphates and nutrient neutrality in January 2021, the ability of LDPs to demonstrate they can align with the revised approach is paramount for plans to be able to be considered 'sound'. This primarily applies to the scale and location of new development, the ability of the existing infrastructure to remove phosphates to accommodate growth, the levels of phosphates within the riverine system and how nutrient neutrality can be achieved. **The Deposit Plan and associated HRA must demonstrate nutrient neutrality or betterment in order to be considered sound.**

### **Growth Levels: Homes and Jobs**

The Council's Preferred Strategy is based on Growth Option 5, a population/demographic-led projection, with added policy assumptions. This results in a requirement of 7,605 dwellings (507 dpa) over the plan period 2018-2033.

Policy S6: Delivery of Homes, makes provision for 8,366 dwellings to deliver a requirement of 7,605 units with a 10% flexibility allowance. The Council needs to explain why 10% is appropriate in line with requirements in the DPM as a lower flexibility allowance may be suitable.

The proposed level of housing is very significantly above the WG 2018 principal projection, requiring an annual completion rate higher than both the previous 5 and 10 year averages. Monmouthshire is outside the South East Wales National Growth Area, as set out in the Future Wales. **The Preferred Strategy is not in general conformity with Future Wales due to the very high level of housing growth proposed. Further detail is provided in Annex 1.**

### **Spatial Distribution of Housing**

Monmouthshire's preferred spatial strategy, Option 2: 'Distribute Growth Proportionately across the County's most Sustainable Settlements' states the level of growth proposed in each settlement will be proportionate to its size, amenities, affordable housing need and capacity for growth. The settlement hierarchy listed in Strategic Policy S2 is underpinned by findings in the Council's Sustainable Settlements Appraisal (June 2021). The appraisal confirms the dominant role of the Tier 1 County towns of Abergavenny, Chepstow and Monmouth that account for the majority of all housing development at 58%. The appraisal identifies the other Tier 1 settlement of Caldicot within the Severnside cluster, which has strong geographical and functional linkages to other Tier 2, 3 and 4 settlements along the M4 corridor. There is also a strong functional linkage with Newport, Cardiff and Bristol. Together the area accounts for 28% of the plan's housing growth. This could be increased to reflect proximity to the National Growth Area and Bristol, future improvements to public transport capacity, land released by the withdrawal of the M4 Highway Orders and the possibility that growth in Abergavenny and Monmouth will be constrained by phosphate pollution. **Welsh Government does not object to the Preferred Strategy's settlement hierarchy and distribution of housing growth** with 86% of all new housing development proposed in the Tier 1 settlements and the Severnside cluster.

The Deposit Plan should:

- Specifically identify the number of new homes proposed in Tier 4 Main Rural Settlements and Tier 5 Minor Rural Villages separately. Tier 5 will not have settlement boundaries.
- The rationale for including Tier 6 Open Countryside in the settlement hierarchy is unclear as new buildings away from existing settlements or allocated sites must be strictly controlled.

## **Affordable Housing**

The Local Housing Market Assessment 2020-2025 (LHMA) identifies a need for 468 affordable units per annum (or 7,020 units over the plan period), of which 68% is for social rent and 32% intermediate need. The greatest demand is for 1 bed properties across Monmouthshire with the level of housing need greatest in the sub-market area of Chepstow and Caldicot (at 46%).

To address housing affordability, the Council aims to deliver 10% (705 units) of the identified LHMA need on sites of 50:50 affordable and market housing, thus providing an additional 1,410 affordable and market units over the plan period. **The Welsh Government supports the principle of affordable housing-led sites, but their delivery will need to be evidenced by testing in the Council's viability appraisals** at Deposit stage. Evidence should also include a resolution to use public land for this purpose, a binding legal agreement where the land is in private ownership or a resolution of the council to use compulsory purchase powers. The Council should explain why 10% of the need identified in the LHMA has been chosen and not alternative percentages. The location of sites to accommodate the additional 705 affordable units is unclear.

Strategic Policy S7 identifies the plans affordable housing target totalling 2,450 units based on viability percentages in the adopted LDP. There is **no viability evidence to accompany the revised plan on either a high level or site specific viability appraisals**. This needs to be rectified by Deposit stage. The Welsh Government also has the following observations:

- The Council should clarify if the 1,489 affordable units (Table 7, LDP) on allocated sites include 705 units through the affordable housing policy-led element, or whether these are additional.
- The Deposit Plan should meet the requirements as set out in the DPM 'Affordable Housing Policy Framework – Checklist'.

## **Employment Provision and Job Growth**

Strategic Policy S13 makes provision for a minimum of 43ha of employment land. This is supported by the Council's Employment Land Review (ELR, 2021) advising that employment forecasts are based on past take-up rates (2.1ha per annum) plus a 5-year buffer (10.7ha), equating to a requirement of 43ha over the plan period (2018-2033).

The scale of job growth being sought by the Council is accelerated growth, beyond existing levels achieved, described as radical structural economic change (Future Monmouthshire, Economies of the Future Analysis: Strategic Direction Report, October 2018). This is above the Oxford Economics baseline growth level, as well as UK growth rates. The Regional Employment Study, Larger than Local (March 2020), suggests that:

*"Between 2018 and 2040, employment is forecast to decrease by 1%, a drop of 400 jobs. This decline is against the growth trend projected for the UK (+7%) and Wales (+1%)." (Page 164)*

This study was undertaken by BE Group, which would appear to be at odds with the Edge Analytical evidence to support the LDP, a difference of 7,600 jobs.

Furthermore, *"The relatively low employment growth projections for Monmouthshire were challenged by considering another set of employment projections by Experian, illustrated in Figure 38, which were found to be even more negative for the County. As per Experian's projections, employment growth is expected to stagnate/decline throughout the next two decades, placing Monmouthshire below both UK and Welsh projected growth levels."* (Future Monmouthshire, Economies of the Future, Economic Baseline Report, March 2018, page 34)

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

The following should also be addressed by Deposit stage:

- Of the 7,215 new jobs, the Council acknowledges that not all of these jobs will be in the B-Class sector and will build on existing sectors including agri-food and manufacturing. However, the Council's own evidence identifies a decline in these sectors over the plan period. The Council will need to demonstrate greater certainty on delivering the scale of job growth as an under delivery of jobs will not deliver on the key issues the plan is seeking to address.
- The Council needs to explain how growth in surrounding Councils, as expressed in the 'Larger than Local Study', such as the strong economic driving force of Newport and high employment take-up rates in Caerphilly, will impact on employment growth in Monmouthshire.
- Allocations at Quay Point (13.76ha) and Gwent Europark (13.30ha) account for almost 67% of available supply in the County. For the development of these sites to occur, significant infrastructure investment is required before making them available for development in the medium to long term. With a reliance on these sites to deliver a high number of B-Class jobs, the council needs to demonstrate how their timing and phasing relates to the delivery of 481 new jobs per annum.
- Significant new employment land allocations will be required in Abergavenny and Monmouth to support proposed housing growth. Failure to provide suitable sites will result in further out commuting contrary to one of the stated aims of the plan. Alternatively, a higher proportion of housing growth could be allocated to settlements where employment land is available.

### **Gypsy and Traveller Provision**

No Gypsy and Traveller Assessment (GTAA) for the replacement plan has been included in the evidence base (the Council submitted a draft assessment for approval to Welsh Government's Communities Division early 2021). The draft assessment identifies a need for 13 pitches over the plan period (2018-2033) with 9 residential pitches 2020-2025 and a further 4 pitches 2026-2033.

**A GTAA must be agreed by Welsh Ministers by Deposit stage and cover the full plan period 2018 to 2033. Provision must be made in the Deposit plan for appropriate and deliverable site allocations to meet the identified need in the timescales set out.** Failure to agree the GTAA and meet the identified need, specifically in the short to medium term, is likely to result in the plan being considered 'unsound'. We would therefore encourage your authority to work with our Communities Division to ensure an agreed GTAA is in place by Plan Deposit.

### **Minerals**

The second review of the Regional Technical Statement (RTS2) has been endorsed by Monmouthshire County Council and identifies that no allocations are required in the plan period for crushed rock or sand and gravel. It is a requirement of the RTS2 for all authorities, including Monmouthshire, to agree a Statement of Sub-Regional Collaboration (SSRC) on their contribution to the future provision of aggregate production in the Former Gwent sub-region, which also includes the authorities of Newport, Torfaen and Blaenau Gwent. A SSRC is pertinent for the region as the RTS2 identifies a shortfall of crushed rock, particularly in Newport and Torfaen, with extensive unworked reserves in Monmouthshire.

## **Other Matters to address at Deposit Stage**

- Ensure all development is compliant with TAN15 and flood risk issues. This should be done in compliance with the revised TAN15, anticipated to be published September 2021.
- Set out a robust housing trajectory, clearly identifying the phasing and timing of sites, linked to any infrastructure required to deliver the housing requirement. Tables 16, 17, 19, 20, 21 and Diagram 16 in the DPM should be completed.
- The selected strategic growth options should be progressed further, with greater clarity, including schematic diagrams and the key issues which need to be addressed for each site to come forward.
- Ensure there is a net benefit for biodiversity (PPW, paragraphs 6.4.5 – 6.4.8).
- Prepare an Infrastructure Plan to demonstrate how relevant infrastructure to support development will come forward (DPM, paragraphs 5.125 – 5.128).
- For some strategic development sites, there is potential for cumulative trunk road capacity impacts, especially at Abergavenny and Chepstow. All strategic development sites should be supported by Transport Assessments that are underpinned by the Welsh Transport Strategy and have regard to Active Travel and air quality, especially in existing Air Quality Management Areas (AQMAs).
- Undertake further work on the contribution renewable energy can make to assist with climate change and decarbonisation.

\*\*\*\*\*

**Table 27 Tests of Soundness**

<p><b>Preparation Requirements:</b></p> <ul style="list-style-type: none"> <li>▪ Has preparation of the plan complied with legal and regulatory procedural requirements? (LDP Regulations, CIS, SEA Regulations, SA, HRA etc.?)</li> <li>▪ Is the plan in general conformity with the NDF and/or SDP? (when published or adopted respectively)</li> </ul>
<p><b>Test 1: Does the plan fit?</b> (Is it clear that the LDP is consistent with other plans?)</p> <p><b>Questions</b></p> <ul style="list-style-type: none"> <li>• Does it have regard to national policy (PPW) and the WSP (NDF when published)?</li> <li>• Does it have regard to the Well-being Goals?</li> <li>• Does it have regard the Welsh National Marine Plan?</li> <li>• Does it have regard to the relevant Area Statement?</li> <li>• Is the plan in general conformity with the NDF (when published)?</li> <li>• Is the plan in general conformity with relevant SDP (when adopted)?</li> <li>• Is it consistent with regional plans, strategies and utility provider programmes?</li> <li>• Is it compatible with the plans of neighbouring LPAs?</li> <li>• Does it regard the Well-being Plan or the National Park Management Plan?</li> <li>• Has the LPA demonstrated it has exhausted all opportunities for joint working and collaboration on both plan preparation and the evidence base?</li> </ul>
<p><b>Test 2: Is the plan appropriate?</b> (Is the plan appropriate for the area in the light of the evidence?)</p> <p><b>Questions</b></p> <ul style="list-style-type: none"> <li>• Is it locally specific?</li> <li>• Does it address the key issues?</li> <li>• Is it supported by robust, proportionate and credible evidence?</li> <li>• Can the rationale behind the plan's policies be demonstrated?</li> <li>• Does it seek to meet assessed needs and contribute to the achievement of sustainable development?</li> <li>• Are the vision and the strategy positive and sufficiently aspirational?</li> <li>• Have the 'real' alternatives been properly considered?</li> <li>• Is it logical, reasonable and balanced?</li> <li>• Is it coherent and consistent?</li> <li>• Is it clear and focused?</li> </ul>
<p><b>Test 3: Will the plan deliver?</b> (Is it likely to be effective?)</p> <p><b>Questions</b></p> <ul style="list-style-type: none"> <li>• Will it be effective?</li> <li>• Can it be implemented?</li> <li>• Is there support from the relevant infrastructure providers both financially and in terms of meeting relevant timescales?</li> <li>• Will development be viable?</li> <li>• Can the sites allocated be delivered?</li> <li>• Is the plan sufficiently flexible? Are there appropriate contingency provisions?</li> <li>• Is it monitored effectively?</li> </ul>

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