



**Monmouthshire County Council  
Local Development Plan**

**LDP Review Report**

**March 2018**

**Planning Policy Service**

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## 1.0 Introduction

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

### **Full LDP Review**

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

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

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

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

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

- 1.8 The Review Report is structured as follows:

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

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

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

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

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

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

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

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

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

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

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

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

### 2.1 LDP Annual Monitoring Report – Key Findings

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

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

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

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

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

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

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

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

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

## **2.2 Contextual Changes**

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

### **Legislative Context**

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

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

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

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

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

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



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

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

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

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

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

### **National Context**

#### **Natural Resources Policy**

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

## **National Development Framework**

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

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

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

### **PPW Amendments**

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

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

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

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

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

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

### **Regional Context**

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

- 2.2.11 The Planning (Wales) Act provides a legal framework to allow for the preparation of Strategic Development Plans. This will allow larger than local issues such as housing demand, search areas for strategic employment sites and supporting transport infrastructure, which cut across a number of local planning authorities, to be considered and planned for in an integrated way. SDPs will address cross-boundary issues at a regional level and must be in general conformity with the NDF. The Regulations make reference to three potential strategic planning areas including South East Wales. It is anticipated that Monmouthshire will be part of this strategic planning area, in alignment with the Cardiff Capital Region City Deal proposals. Regional discussions on the options for progressing a SDP are ongoing and any subsequent progress will be considered through the LDP revision process.

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

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

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

## **Local Context**

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

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

### **Future Monmouthshire**

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

### **Economic Considerations**

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

### *House Prices*

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

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

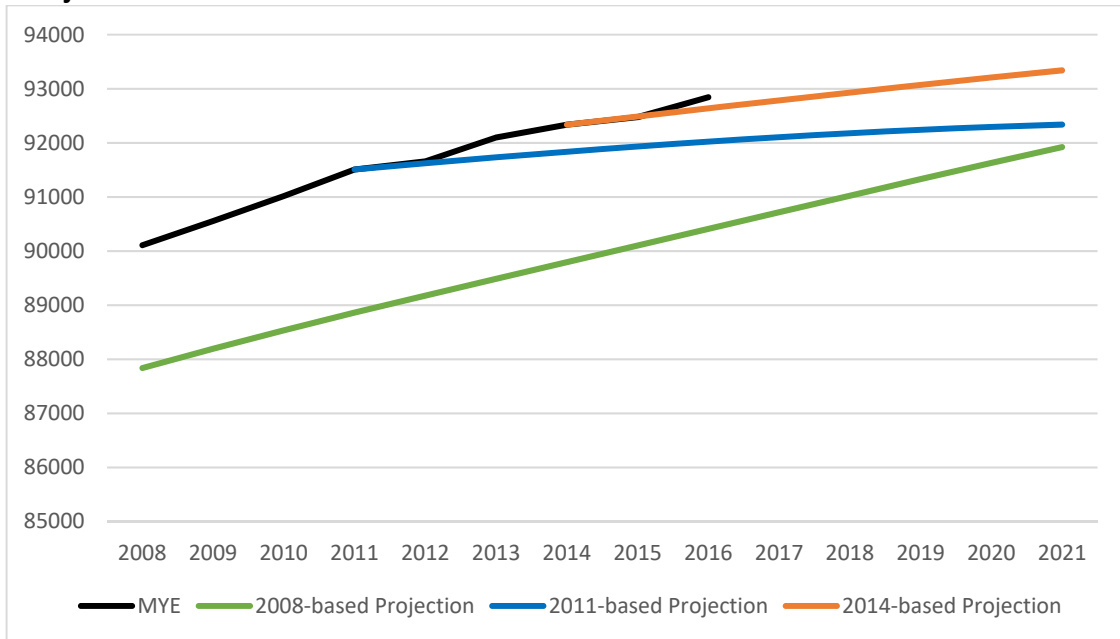
## **2.3 Evidence Base Change – Welsh Government Population and Household Projections**

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

### **Revised Population Projections**

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

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



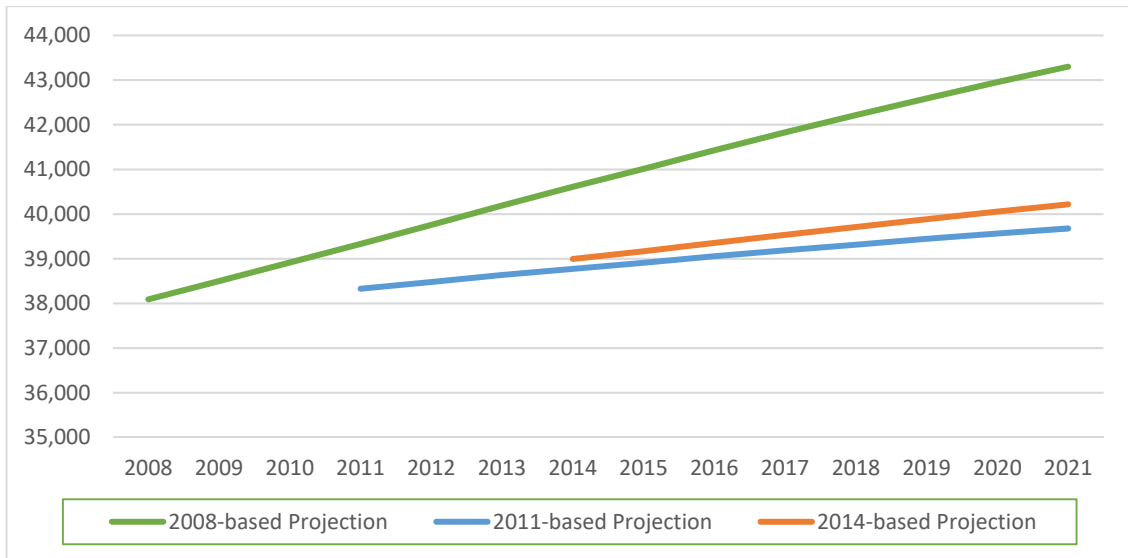
2.3.4 These lower levels of population growth are in contrast to the 2008-based population projections which the LDP used as the starting point for its growth strategy.

**Revised Household Projections**

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

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

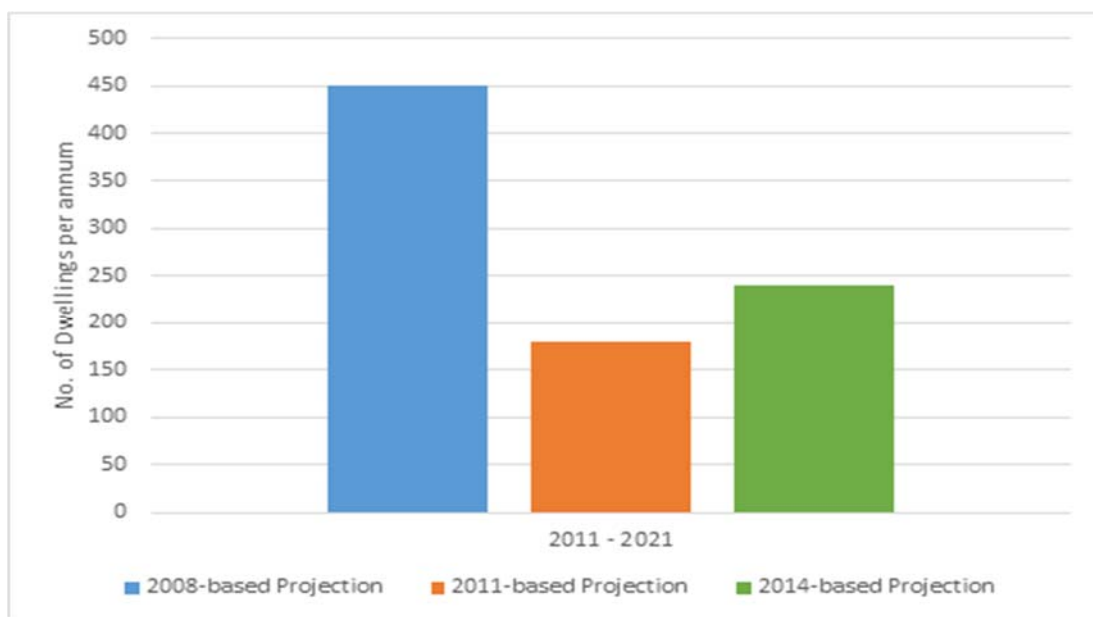
**Figure 2: Comparison of Welsh Government’s 2008, 2011 and 2014 based Household Projections for Monmouthshire**



**Dwelling Requirements**

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

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





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

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

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

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

#### LDP Vision

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

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

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

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

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

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

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

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

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

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

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

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

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

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

### **LDP Issues and Objectives**

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

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

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

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

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

#### Draft Review Report Consultation Findings

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

## 3.2 Review of LDP Strategy

### Spatial Distribution of Housing

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

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

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

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

### Level of Housing Growth

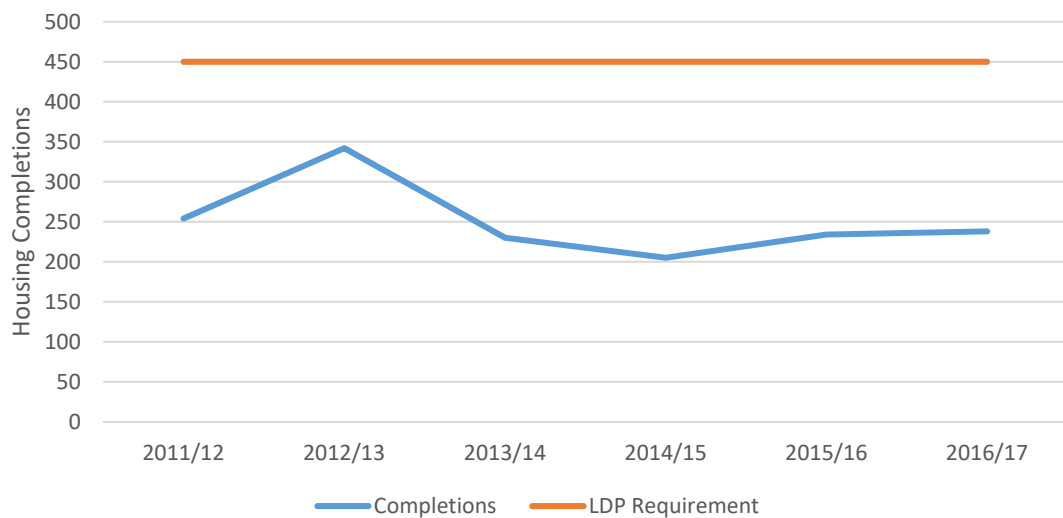
- 3.2.3 The chosen level of housing provision in the LDP is 4,500 dwellings over the Plan period 2011-2021. This accommodates the level of growth indicated by the 2008-based Welsh Government Household projections, which as detailed in Section 2.3, projected an increase for the County of 3,969 households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

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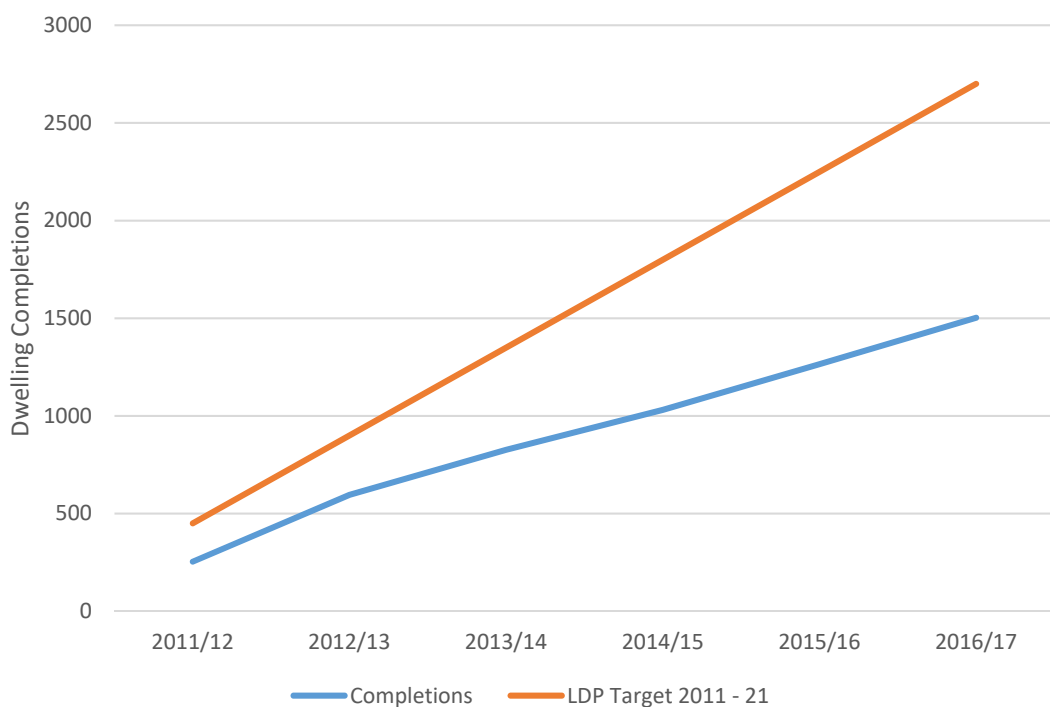
<sup>5</sup> Based on commitments (i.e. sites with extant planning permission for residential use) at 29/11/2017 and residential completions 01/04/2011-31/03/2017.

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

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



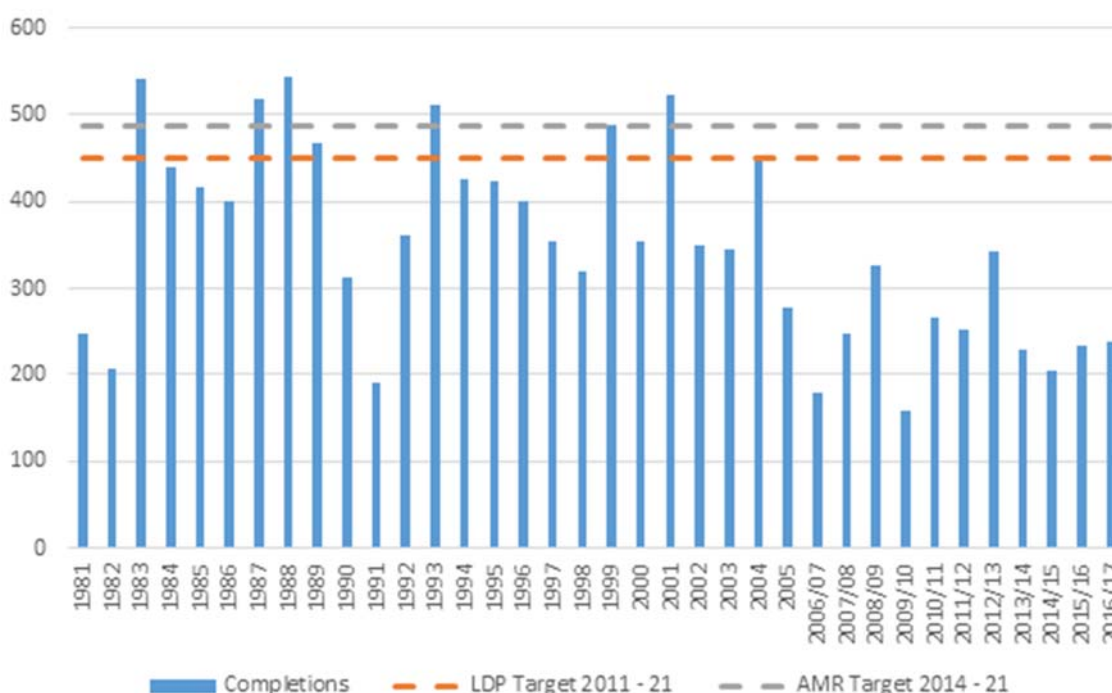
**Figure 5: Cumulative Housing Completions compared with LDP Target 2011 - 2017**



## Housing Delivery since LDP Adoption

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

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



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

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



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

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

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

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

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

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

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

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

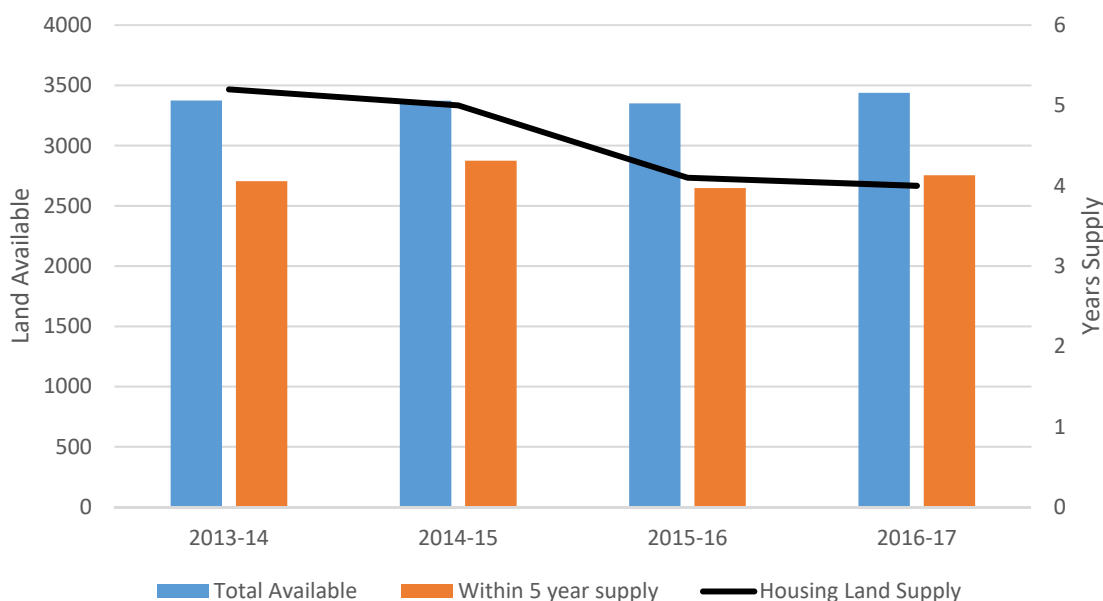
3.2.16 Planning Policy Wales (PPW) Edition 9 (November 2016) at paragraph 9.2.3, states that local planning authorities must ensure that sufficient land is genuinely available or will become available to provide a 5 year supply of land for housing. Monmouthshire has not achieved a 5 year housing land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

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

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

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

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



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

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

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

## Reconsideration of the LDP Strategy

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

### Draft Review Report Consultation Findings

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

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

### 3.3 Review of LDP Policies

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

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

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

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

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

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

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

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

## **Affordable Housing**

*[Policies S4, H7, SAH11]*

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

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

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

### **Gypsy Travellers**

*[Policy H8]*

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



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

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

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

### **Open Space**

*[Policies CRF2, DES2 Designations]*

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

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

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

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

## **Retail**

### *[Policy S6]*

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

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

### **Planning Obligations**

*[Policy S7]*

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

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

### **Employment**

*[Policies S9, SAE1 and SAE2]*

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

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

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

#### *Employment Land – Take up*

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

#### *Employment Land – Quantity and Spatial distribution*

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

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

### **Tourism**

*[Policies S11, T1-T2]*

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

### **Renewable Energy**

*[Policies S12, SD1]*

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

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

## **Waste**

### *[Policy S14]*

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

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



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

- 3.3.45 The CIMS Plan describes the waste management framework considered to provide the best solutions to meet environmental, social and economic needs in Wales to 2050. Waste assessments contained within the CIMS Plan do not have to be repeated by local planning authorities at a regional or local level. However, monitoring needs to be carried out through voluntary co-operation at a regional level to inform decision making in future LDPs and in dealing with planning applications for waste. The regional monitoring work has resulted in the first Waste Planning Monitoring Report (WPMR) for South East Wales (April 2016). This concluded that the regional position was:
- There is no further need for landfill capacity within the South East region.
  - Any proposals for further residual waste treatment should be carefully assessed to ensure that the facility would not result in overprovision.

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

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

## **Minerals**

### *[Policy S15]*

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

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

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

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

## **Transport**

### *[Policies S16, MV10]*

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

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

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

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

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

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

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

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

- Rural Conversions to Residential or Tourism Use, November 2017

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

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

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

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

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

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

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

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

### Evidence Base Studies

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

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

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

### Sustainability Appraisal and Habitats Regulations Assessment

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

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

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

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

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

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

## 5.0 Joint LDPs / Joint Working

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

### **Strategic Development Plan**

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

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

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

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

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

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

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

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



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

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

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<sup>13</sup> 2016 population data

<sup>14</sup> Corine Landcover Inventory

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

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

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

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

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

#### *Monmouthshire and Torfaen Joint LDP*

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

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

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

*Monmouthshire and Newport Joint LDP*

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

*Monmouthshire and Blaenau Gwent Joint LDP*

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

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

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

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

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

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

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

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