

APPENDIX 4

RLDP Options Appraisal

Options	Population, Dwellings and Jobs Growth over the Plan Period 2018-2033	Benefits	Risks
<p>1. Proceed with the existing Preferred Strategy (as consulted on July-August 2021)</p>	<ul style="list-style-type: none"> • Population growth: 12,443 (+13.2%) • Net Migration: 18,345 • Dwellings: Total provision approx. 7,605-8,366* homes, including 2,170 - 2,450 affordable homes • Existing Landbank: approx. 4,710 homes** • New Allocations: approx. 2,900 - 3,660 homes, including 1,210 - 1,490 affordable homes. • Jobs: Policy support to provide for 7,215 jobs*** 	<ul style="list-style-type: none"> • This option would deliver key outcomes. • Based on robust and credible local evidence • Address key RLDP local evidence-based issues & objectives across the County, including in relation to the delivery of affordable homes, balancing our demography and supporting sustainable economic development. • Momentum on finding solutions to Phosphates • Would be no need to re-consult on the Preferred Strategy which would save time in the Plan preparation process, with earlier Plan adoption and less time without an up-to-date RLDP and associated impacts. • Sufficient level of growth to enable the Council to consider alternative mechanisms for delivering affordable homes for our communities. • Aligns with Policies 4, 5 and 7 of Future Wales: the National Plan 2040 by supporting rural communities and delivering affordable homes. • Would meet key tests of soundness, including Test 2¹ • Evidence base would inform the emerging SE Wales Strategic Development Plan (SDP). 	<ul style="list-style-type: none"> • Finding an evidenced strategic solution for phosphate mitigation in the River Wye catchment highly improbable during the Plan period, meaning that the strategy could not be delivered. • Without an identified strategic phosphate solution for the River Wye catchment, the strategy would be at odds with the Council's Climate and Nature Emergency Declaration and the emerging Motion for Oceans and Rivers, and would likely result in an NRW objection • WG objection letter would need to be addressed – level of growth considerably higher than prescribed WG level of growth. • The housing trajectory would be questionable given level of growth and Plan period remaining.

¹ Development Plans Manual (WG, March 2020): Soundness Test 2 'Is the plan appropriate? (Is the plan appropriate for the area in the light of the evidence?) • Is it locally specific? • Does it address the key issues? • Is it supported by robust, proportionate and credible evidence? • Can the rationale behind the plan's policies be demonstrated? • Does it seek to meet assessed needs and contribute to the achievement of sustainable development? • Are the vision and the strategy positive and sufficiently aspirational? • Have the 'real' alternatives been properly considered? • Is it logical, reasonable and balanced? • Is it coherent and consistent? • Is it clear and focused?'

Options	Population, Dwellings and Jobs Growth over the Plan Period 2018-2033	Benefits	Risks
<p>2. Proceed with Demographic-led strategy² and an amended spatial strategy to take account of the phosphate constraint in the River Wye Catchment</p>	<ul style="list-style-type: none"> • Population growth: 9,480 (+10.9%) • Net Migration: 13,950 • Dwellings: Total provision approx. 5,400 – 5,940* homes, including 1,500 - 1,770 affordable homes • Existing Landbank: approx. 3,940 homes**** • New Allocations: approx. 1,460 – 2,000 homes, including 730 – 1,000 new affordable homes***** • Jobs: Policy support to provide 6,240 jobs*** 	<ul style="list-style-type: none"> • Would deliver growth (homes and jobs) that addresses our locally evidence-based issues and objectives in the south of the County and River Usk catchment area, including in relation to the delivery of affordable homes, rebalancing our demography and responding to the climate and nature emergencies, therefore delivering key outcomes. • Closer alignment between MCC’s preferred growth level and the level of growth prescribed by WG’s July 2021 letter. • All new dwelling allocations would be required to deliver 50% affordable housing, maximising the delivery of essential affordable homes and socially sustainable communities. • Sufficient level of growth to enable the Council to consider alternative mechanisms for delivering affordable homes for our communities. • Spatial strategy would avoid those areas affected by phosphates and without an identified feasible solution. • Aligns with Policies 4, 5 and 7 of Future Wales: the National Plan 2040 by supporting our rural communities and delivering affordable homes. • Would meet key tests of soundness, including Test 2³ • Evidence base would inform the emerging SE Wales Strategic Development Plan (SDP). Simplified strategy. 	<ul style="list-style-type: none"> • Would not deliver key outcomes/address local evidence-based issues in the River Wye catchment settlements, creating further inequality, however the environmental constraint makes this unavoidable at present. • No affordable housing delivery within Wye Catchment settlements, including Monmouth. • This option would require the Council to reconsult on an updated Preferred Strategy which would add time to the RLDP process, meaning a longer period without an up-to-date plan. • Limited Plan period left on adoption (approx. 8.5 years) which means there is less time to deliver the Plan’s growth, impacting on the housing trajectory. • Viability – would need to evidence that the provision of 50% affordable housing on new sites is viable. This could be challenging in view of our other policy requirements including in relation to zero carbon ready homes and associated infrastructure to support the development. Social Housing Grant (SHG) or other public funding may be required for some sites, requiring a change to current SHG rules.

² demographic-led option for the LPA area (i.e. excludes the BBNP area within Monmouthshire) using ONS 2020 MYE base and applying the same assumptions as the existing Preferred Strategy in relation to migration, household membership rates and commuting ratio.

³ As footnote 1 above.

<p>3. Proceed with a minimum growth option as per the July 2021 WG letters, combined with an amended spatial strategy which takes account of the phosphate constraint in the River Wye Catchment</p>	<ul style="list-style-type: none"> • Population growth: 8,050 (+9.3%) • Net Migration: 12,450 • Dwellings: approx. 4,280 – 4,700, including 940 – 1,150 affordable homes • Existing Landbank: approx. 3,940 homes**** • New Allocations: approx. 330 – 760 homes, including 170-380 affordable homes***** • Jobs: Policy support to provide 4,290*** 	<ul style="list-style-type: none"> • Addresses WG’s consultation response to the RLDP Preferred Strategy (August 2021). • Less environmental impact. • Spatial strategy would avoid those areas affected by phosphates and without an identified feasible solution. • Simplified strategy. 	<ul style="list-style-type: none"> • This minimum level of growth is not based on robust and credible local evidence and would not meet our objectives or address our local evidence-based issues (including affordable housing delivery, balancing our demography and more generally supporting our communities) and as such would not meet key tests of soundness at Examination, including Test 2⁴. • Would not deliver the Administration’s manifesto commitment to maximise affordable housing delivery via 50% affordable housing provision on new housing sites as there would be very few new site allocations. This minimal level of provision would make minimal contribution towards addressing our affordable housing need in the County, as evidenced in the LHMA. • Lack of associated investment towards community infrastructure given limited new housing allocations. • This option would not support sustainable economic growth/prosperity and would exacerbate our existing key local issues including housing affordability, homelessness, ageing demographic and rural isolation. As such this option would not deliver on Council’s priority of addressing inequality. • Would not align with Policies 4, 5 and 7 of Future Wales: the National Plan 2040 as this level of growth would not support our rural communities (homes and jobs) or delivery much needed affordable housing. • This option would require the Council to reconsult on an updated Preferred Strategy which would add time to the RLDP process, meaning a longer period without an up-to-date adopted plan
---	--	--	--

- | | | | |
|--|--|--|---|
| | | | <ul style="list-style-type: none">• Concern that the lack of ambition associated with the growth level and its negative implications for our local communities would be replicated in the emerging SDP. Local evidence-based issues, including affordability, demography and inequality, would be exacerbated over the longer term via the regional plan. |
|--|--|--|---|

Options	Population, Dwellings and Jobs Growth over the Plan Period 2018-2033	Benefits	Risks
<p>4. Restart the RLDP process</p>	<p>N/A - would need to reconsider growth options</p>	<ul style="list-style-type: none"> • This option would mean a review of the evidence base and the use of the most up-to-date evidence, including the 2021 Census which will inform updated national projections in 2023/24. • This option would enable more time to address phosphates issues with a view to identifying and implementing a strategic solution to phosphate mitigation in the River Wye catchment area. • The housing trajectory would be more achievable due to longer Plan period on adoption. 	<ul style="list-style-type: none"> • This would lead to a significant delay in the RLDP preparation process resulting in a longer period without an up-to-date RLDP for Monmouthshire. • The evidence base and policy framework in the extant adopted LDP would become increasingly outdated creating a local policy gap and reducing the Council’s ability to positively shape the future. • This option would result in a delay in addressing our key issues, during which time the issues would be exacerbated, including housing affordability, demographic balance and inequality. This would also impact on the delivery of sustainable economic growth. • Associated lack of certainty for our communities and investors. • This option would adversely affect momentum and undermine investment commitments to deliver phosphate solutions. • This option would necessitate re-starting the entire RLDP process, meaning that the issues, vision and objectives, and growth options stages of the RLDP would need to be revisited and evidence base work updated with revised base date and Plan period. This would have cost and resource implications for the Council, site promoters and other stakeholders engaged in the process. • The lack of leadership and direction would reflect poorly on the Council. • There would be a reduced opportunity to shape the SDP from the local level due to the timelines.

*includes 10% flexibility allowance

** The 2021 Preferred Strategy landbank figures included LDP Rollover applications, land supply commitments and allowances within the Wye Valley and the sites taken out due to non-delivery. It did not include completions for 2021/22.

*** Job figures are at a Unitary Authority level as small area data is not available. All other figures refer to the Local Planning Authority area, i.e. excluding Brecon Beacons National Park.

****The new 2022 option's landbank excludes existing land supply commitments and allowances within the River Wye catchment. Land bank also excludes LDP Rollover sites and sites taken out due to non-delivery. It includes completions for 2021/22.

***** Based on all RLDP site allocations being 50% affordable housing.