Appendix 3

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

Question 1 – Do you have any comments on the key Issues, Vision and Objectives?

89 organisations or members of the public submitted a response to question 1.

The responses were varied, many organisations and private individuals provided overall support for the issues, vision and objectives. Others wish to see changes to wording and some questioned how the objectives would be measured.

A number of area specific comments were made both supportive and of concern, particularly in relation to those areas where strategic sites are proposed.

Key Theme	Summary of Points Raised
General support	• Welcome the Preferred Strategy in particular the recognition of need for additional housing in Chepstow as so many families are in housing need [Chepstow Town Council]. • Provide general support, particularly through recognition of the challenge of the need for affordable housing and therefore reason for the high housing growth proposed [Torfaen County Borough Council]. • Note the Vision is clear and agree the objectives are sufficiently aspirational yet achievable within a spatial planning context [Llanover Estates, Leathdunn Ltd., Johnsey Estates UK, Johnsey Estates 2020 Ltd, Vistry Group, The Coldbrook Estate & Private individual x 1]. • Support the Vision and Objectives but believe a greater proportion of development should be directed towards the main rural settlements [Monmouthshire Housing Association]. • Accept the Objectives are sufficiently aspirational yet achievable to varying degrees [Abergavenny & District Civic Society]. • Support and agree with statement in paragraph 3.2 [Natural Resources Wales]. • Generally support the principle of the vision, in particular the aim to distribute growth to sustainable communities such as Usk. However note it is imperative that this is translated into policies [Private individual x 1]. • Generally support the principle of the vision, in particular the aim to distribute growth to existing rural communities such as Shirenewton, helping them become resilient with modest growth supporting local services and facilities and more housing choice including affordable to encourage younger populations to remain in communities they grew up in [Private individual x 1]. • Key objectives set out within the vision are supported [Hallam Land Management]. • Consider the relevant core issues have been identified [Redrow Homes]. • Suggest the vision, issues and objectives are fairly generic and uncontentious in nature [Barratt & David Wilson Homes South Wales, Candleston Homes, Taylor Wimpey PLC & Private individual x 1]. • Note it is demonstrated that the PS has been underpinned by the five ways of working set out in the Wellbeing of Future Generations Act (WBFGA) which will form and important part of evidencing that the RLDP is sound. Acknowledge and support the key issues, challenges and opportunities [Redrow Homes Limited]. • Support the key issues, challenges & opportunities and note the vision and objectives comply and integrate with the WBFGA [Edenstone Group, Barwood Development Securities Limited & Edenstone]. • Support the vision and objectives [Mathern Community Council & Private individual x 1]. • Note it is encouraging to see mention of active travel, green infrastructure, local food production, Monmouthshire's unique landscape, tourism potential and the need to improve water quality in rivers [Private individual x 1]. • Agree with the high level vision and broadly agree with the objectives [Private individual x 1]. • Comprehensive strategy, support all 17 objectives [Private individual x 1].

Key issues, challenges and opportunities	• Welcome reference in paragraph 3.6 noting there is a limited supply of previously developed land along with paragraph 3.7 noting it is not possible to avoid allocating land that is best and most versatile [Barratt & David Wilson Homes, Barratt & David Wilson Homes South Wales, Richborough Estates, Candleston Homes & Taylor Wimpey PLC]. • Suggest a full carbon footprint of the County Is needed to inform where maximum carbon reductions should be focussed, refer to remaining within 1.5^{o}C suggesting this is too vague [Abergavenny Transition Town]. • Refer to the summary of key issues, suggest 'appropriate growth sectors' needs defining particularly given the climate emergency [Abergavenny Transition Town]. • Question what 'opportunities associated with growth from both the Cardiff Capital Region and Bristol Region' are, suggest recent examples be provided [Abergavenny Transition Town]. • Note rural isolation/sustaining rural communities/regenerating the rural economy are highlighted but no hint of what might lead to tackling these things other than diversification and tourism [Abergavenny Transition Town]. • Refer to the protection of landscapes and heritage noting more radical interventions are required if rural isolation/sustaining rural communities and regenerating the rural economy are going to happen [Abergavenny Transition Town]. • Regarding Tourism note nothing is mentioned about the seasonal and potential low-pay of this sector leading to inability to afford local accommodation, nor mention of impacts of second homes and Air BnB lettings in formally stable rural communities [Abergavenny Transition Town]. • Suggest the causes of phosphate pollution should be specified to allow policy to focus on the dominant causes [Abergavenny Transition Town]. • Refer to digital connectivity and note it would be useful to have statistics on the current roll out of high-speed fibre broadband and timescale for full coverage [Abergavenny Transition Town]. • Suggest nature emergency could be better addressed, noting differences should be recognised between land use and land management and by providing detail of the proposed actions that would be implemented through the policy framework [Natural Resources Wales]. • Do not feel the five aspects of ecosystem resilience as set out in the Environmental (Wales) Act 2016 are addressed in the RLDP, suggest this legislation and the South East Area Statement should be referenced in this section [Natural Resources Wales]. • Acknowledge reference to phosphates throughout but wish to highlight there are significant pre-existing pressures on the public sewer network across the County, the RLDP should not exacerbate these pressures [Natural Resources Wales]. • Wider water network failures should be listed as well as phosphates to ensure proposed growth doesn't exacerbate this problem [Natural Resources Wales]. • Acknowledge changes to issues relating to biodiversity and also invasive non-native species [Natural Resources Wales]. • Key opportunities should also include the Nature Recovery Plan [Natural Resources Wales]. • State a number of the points are interlinked and must be considered holistically to ensure an appropriate policy response, such as demographic issues, high house prices, affordability, increasing need for affordable housing & opportunities for growth from both the Cardiff Capital and Bristol regions [Richborough Estates]. • Concern over statement relating to an older population reducing the number of people using and financially supporting businesses and services. Suggest some parts of Monmouthshire are well known to attract retired people [Private individuals x 2]. • Refer to loss of agricultural land referred to in paragraph 3.7, suggest measures need to be put in place to ensure developers don't buy up land, holding it as potential investment without using it in the meantime [Private individual x 1]. • Refer to paragraph 3.13 stating in addition to green spaces, footpaths and cycleways are needed to connect residential areas with the Monmouthshire countryside [Private individual x 1].

	• Refer to the elderly noting they want to be part of an elderly community and that retirement villages should therefore be included in the RLDP, suggest their needs have not been considered in the issues, vision and objectives [Private individual x 1]. • State the plan should be for the current Welsh population and should not be catering for Bristolians that are looking for cheaper housing [Private individual x 1]. • Disagree the RLDP recognises the value and importance of placemaking and the provision of locally accessible/open spaces for health and wellbeing and recreation as green spaces are being built on [Private individual x 1]. • State there is no detail in paragraph 3.1 on how empty affordable housing is being dealt with, state this opportunity should be included and prioritised to utilise existing building stock and reduce carbon emissions inherent to building new [Cllr Christopher Edwards & Private individual x 1]. • Consider there is no overriding mandate by Welsh Government to resolve a demographic imbalance by aiming for high growth [Cllr Christopher Edwards & Private individual x 1]. • Suggest the response to climate and nature emergencies while promoting recovery is ignorant of guidance from Welsh Government to restrain growth in rural areas in order to protect the natural environment [Cllr Christopher Edwards & Private individual x 1]. • State there is no evidence to give confidence that the County's growth and location of growth will not continue to drive high levels of out-commuting [Cllr Christopher Edwards & Private individual x 1]. • Suggest the strategy is confused in that placemaking, active travel and environmental considerations are key sustainability principles to be achieved but the ambition is being undermined due to level of growth put forward in the Strategy [Cllr Christopher Edwards & Private individual x 1]. • State the high prevalence of best and most versatile land noted in paragraph 3.1 is one of the reasons why national growth in Wales has been directed elsewhere and that Monmouthshire should instead retain its rural character [Cllr Christopher Edwards & Private individual x 1]. • While recognise it is mentioned elsewhere state there is no mention of requirements to support and maintain nature/diversity within new housing developments, state this is a challenge locally and nationally [Private individual x 1]. • Refer to paragraph 3.7 state the priority and presumption should be to preserve and use the land to feed people now and in the future, suggest instead the statement leans towards granting permission to build on BMV [Private individual x 1]. • Note the key issues, vision and objectives are aspirational but vague, comment that to a degree this is unavoidable as seeks to set out a general picture [Usk Civic Society]. • Refer to phosphates, welcome that MCC are working with statutory bodies to find solutions to enable growth and allocate sites that do not harm the environmental capacity of Monmouthshire's watercourses [Vistry Group, The Coldbrook Estate & Private individual x 1]. • Welcome reference that all of the main towns are outside the Future Wales green belt [Candleston Homes & Taylor Wimpey PLC]. • Advocate the promotion of the role of rural land for employment opportunities with close connection with key defined urban settlements, suggest this would ease new development by re-use of previously developed land which accords with the principle of making efficient use of the land [Private individual x 1]. • Suggest there is an underlying assumption that all rural settlements are in need of housing development to become vibrant places, suggest the lack of development to date indicates insurmountable infrastructure deficiencies [Private individual x 1]. • State no mention of transport infrastructure as a key issue, particular concern in relation to Chepstow [Private individual x 1]. • Commend the key issues, vision and objectives but question how they will be implemented [Private individual x 1].
RLDP Vision	• Suggest vision has not changed following change to Preferred Strategy other than last paragraph, suggest this appears to be an add on [Home Builders Federation].

	• Provide comments to suggest a key element of the strategy should be to encourage vibrant, active and self-contained communities with a mixture of age groups, activities and land uses in line with PPW11. Also suggest the vision should include reference to the agricultural core of the County, and addressing constrained infrastructure that will require investment to achieve the overarching ambitions [Melin Homes, Llanarth Estates, Tirion Homes, Candleston Homes, Sero Homes, Sero & Private individuals x 2]. • State vision is acceptable but clear definition of net zero carbon ready is required [Abergavenny & District Civic Society]. • Suggest criterion 4) of the vision cannot be taken seriously until there is a full understanding of the County's full carbon footprint [Abergavenny Transition Town]. • Applaud parts of the statement that state 'Monmouthshire will be home to well-connected exemplar, affordable housing-led, net zero carbon ready places' and that affordable homes will be delivered 'at pace and at scale while also responding to the nature and climate emergency'. Note however that they have concerns these homes will be truly affordable [Abergavenny Transition Town]. • While broadly support the vision suggest it is inaccurate to say that by 2033 Monmouthshire will be affordable housing-led, suggest it is more a 70:30 ratio. Note the statement does not acknowledge the important role market housing has in delivering new communities. Suggest the vision is amended to omit this reference and instead add in 'a balanced mix of market and affordable housing' [Vistry]. • Suggest there is an opportunity for specific reference to be made to ensuring that sufficient housing is delivered to meet both forecast requirements and address the existing shortfall [Barratt & David Wilson Homes South Wales]. • Recommend amending the wording in the final paragraph of the vision to 'by 2023 Monmouthshire will be home to exemplar places that are well-connected, net zero carbon ready and provide essential affordable homes, and support socially and economically sustainable and resilient communities for all' [Richborough Estates]. • State the Council has a poor record of delivering or enabling delivery of homes at scale or pace, suggest it is commendable to raise the quality of homes but suggest the policy will be undeliverable [Cllr Christopher Edwards & Private individual x 1]. • Refer to the current adopted LDP suggests the vision and objectives are more appropriate than the PS, concern of overdevelopment in southern part of County and increase commuting [Cllr Louise Brown]. • Welcome recognition of need to address protection of environmental qualities, improve access to and facilities within town centres such as Chepstow, provide more affordable housing and address issues of water quality and wider environmental degradation [The Chepstow Society]. • Suggest there is perhaps opportunity in the vision for specific reference to be made to ensuring sufficient housing is delivered to meet both forecast requirements and to address existing shortfall [Candleston Homes & Taylor Wimpey PLC]. • Support vision, suggest it affords policy support specifically for brownfield sites in the countryside that can unlock employment opportunities where they enhance connection between both urban and rural communities [Private individual x 1]. • Suggest the vision would be of detriment to the countryside and due to lack of infrastructure result in further negative impact [Private individuals x 3].
Objective 1 (Economic Growth/ Employment)	• Given the role of agriculture and related employment opportunities believe specific reference should be made in supporting the rural economy [Melin Homes, Llanarth Estates, Tirion Homes, Candleston Homes, Sero Homes, Sero & Private individuals x 2]. • Objective 1 would benefit from an emphasis on the circular economy and 'green' and/or 'clean' growth [Abergavenny & District Civic Society]. • State 'economic growth' should be replaced with 'aiming for a circular economy' and a definition of 'appropriate sectors' of employment should be provided [Abergavenny Transition Town]. • Note it is key to acknowledge changing working patterns and situations where sites currently cater for an employment use that are no longer fit for purpose and therefore more suitable for residential or mixed-use flexible spaces [Private individual x 1].

	• Suggest reference should be made to the increased role that home and agile working can be expected to make over the plan period, note it should seek to encourage/facilitate the increased propensity for home/agile working, alongside the need to bring forward 'traditional' business spaces [Richborough Estates]. • Little indication on how this objective will be turned into a reality [Usk Civic Society]. • Support objective [Private individual x 1].
Objective 2 (Town and Local Centres)	• Suggest consideration must be given to small scale agricultural and food industries and how they can be given a genuine platform to operate successfully in local markets as well as alongside larger retail centres and supermarkets, reducing food miles and giving confidence in food supplies [Melin Homes, Llanarth Estates, Tirion Homes, Candleston Homes, Sero Homes, Sero & Private individuals x 2]. • Agree with Objective [Abergavenny Transition Town]. • Welcome that Objective 2 recognises Abergavenny as a County town and seeks to sustain and enhance its role by seeking to direct development and investment [Johnsey Estates UK & The Coldbrook Estate]. • Support reference to three local centres including Raglan, the RLDP must help sustain and enhance these centres by directing a sufficient level of growth to settlements such as Raglan [Richborough Estates].
Objective 3 (Green Infrastructure, Biodiversity and Landscape)	• Should ensure it is demonstrated how new developments provide biodiversity benefits, greenfield sites provide significant opportunity for biodiversity gain to be made [Melin Homes, Llanarth Estates, Tirion Homes, Candleston Homes, Sero Homes, Sero & Private individuals x 2]. • No mention within objective of dramatic changes in use of the agricultural landscape over the next decade and how policy will need to adjust to those [Abergavenny Transition Town]. • Acknowledge the inclusion of 'ecosystem resilience' within this objective, note building connectivity and linkages should be thought about in an evidence based strategic way, state this objective must inform the strategic growth locations and allocated sites [Natural Resources Wales]. • State this objective is well defined and will help to ensure climate change and nature emergencies are effectively recognised and actioned [Private individual x 1].
Objective 4 (Flood risk)	• Welcome inclusion of objective [Dwr Cymru/Welsh Water]. • Suggest control measures need to mention poor winter farming practices of leaving fields exposed with no cover crops exacerbating storm water run-off [Abergavenny Transition Town]. • Acknowledge the reference to natural flood management within this objective [Natural Resources Wales]. • State this is not being taken seriously by the removal of policy which provides a local reminder that there is a need to comply with TAN15 [Cllr Louise Brown].
Objective 5 (Minerals and Waste)	• Suggest should discourage carbon intensive consumption generally and encourage re-use, repair, refill and recycle [Abergavenny Transition Town]. • Reference to waste reduction in Objective 7 should be included in Objective 5 [Abergavenny Transition Town].
Objective 6 (Land)	• Note in losing a small amount of higher-grade agricultural land it may bring wider benefits to the agricultural sector as a whole [Melin Homes, Llanarth Estates, Tirion Homes, Candleston Homes, Sero Homes, Sero & Private individuals x 2]. • Suggest reference should also be made to the future 'efficient use' of agricultural land to account for increase of local food production [Abergavenny Transition Town]. • Welcome recognition that whilst BMV should be protected it is not always possible in a County like Monmouthshire, provides important context for the search sequence that must be followed in identifying new housing allocations [Richborough Estates].

	• Recognise that this aligns with the search sequence set out in PPW but state caution should be taken to ensure that there is not an overreliance on brownfield sites, as they are slower to develop and will be unlikely to meet the RLDP requirement to deliver 50% affordable housing in all cases [Edenstone Group & Edenstone]. • Suggest the first two points state ambition but immediately create a reason not to meet it and are therefore considered weak policy points [Cllr Christopher Edwards & Private individual x 1]. • Refer to PPW11 and suggest that the approach to using BMV land is contrary to this. Concern there are no policies relating to allotment provision in all housing developments or use of Council owned land to be used for farming and food production [Cllr Louise Brown]. • Support objective as it maximises the opportunities for redevelopment of brownfield sites [Private individual x 1]. • Suggest efficient use of land must also address what is happening on the agricultural land and address local food production, carbon sequestration, restoration of biodiversity, flood risk management, water quality, reversing rural depopulation, tackling isolation and poverty, training and job creation, health, food security and the foundational economy. The RLDP should promote the creation of small farms with farmhouses. Suggest this could be done through housing cooperatives to avoid them being sold off. Promote need for small farms to enable local young people to start farming, state this is particularly needed on Council farms [Our Food 1200].
Objective 7 (Natural resources)	• Welcome the sentiment of objective [Dwr Cymru/Welsh Water]. • Suggest the RLDP should commit to new development being net carbon zero and should only consider such sites for inclusion [Melin Homes, Llanarth Estates, Tirion Homes, Candleston Homes, Sero Homes, Sero & Private individuals x 2]. • Recommend this objective is strengthened by replacing 'promote' with 'ensure' given the detail in the SE Area Statement, noting it links with the theme of 'Climate Ready Gwent' and should therefore deliver a bold policy response by ensuring new development in the County implement measures to meet the objective [Natural Resources Wales].
Objective 8 (Health and Well-being)	• Suggest there is a lack of provision of recreation and sports facilities particularly for the younger generation in Abergavenny. Recommend this matter be included [Abergavenny Transition Town]. • State this objective is well defined and will help to ensure climate change and nature emergencies are effectively recognised and actioned [Private individual x 1].
Objective 9 (Demography)	• State the reference to providing opportunities of housing and employment for young people is not evidenced and is largely aspirational [Abergavenny Town Council]. • Note the impacts of lower levels of growth have previously been considered by the Council, suggest it is difficult to address these matters at levels below the previous version of the Preferred Strategy [Melin Homes, Llanarth Estates, Tirion Homes, Candleston Homes, Sero Homes, Sero & Private individuals x 2]. • Suggest adding 'through increasing considerably, state-led third sector public housing provision, rather than relying on market-led development' [Abergavenny Transition Town]. • State the policies must create a more balanced demography and social and economically sustainable communities if the issues are to be addressed [Richborough Estates]. • Refer to objective 9 stating this will not be achieved as rural areas have more older populations than younger, state comparison with Cardiff is false as it has a university population [Cllr Louise Brown]. • Suggest MCC have little influence in reality over who will live in the new housing stock, it may be just as attractive to downsizing retirees as young families [Usk Civic Society]. • Note this is an admirable ambition but should be more focus on retaining than attracting younger residents, many who plan to continue working in Bristol [Private individuals x 2].

Objective 10 (Housing)	• Question why there is no reference to meeting net zero carbon for all new developments [Abergavenny Town Council]. • Objective 10 should include reference to the wider need for housing not just affordable [Home Builders Federation & Abergavenny & District Civic Society]. • State 'Exemplar' should be removed from wording and replaced with 'good quality' instead as this is considered a constraint that could slow down delivery of the plan [Home Builders Federation]. • Suggest it should be an objective to link housing directly to employment and addressing shortfall and lack of affordability together [Melin Homes, Llanarth Estates, Tirion Homes, Candleston Homes, Sero Homes, Sero & Private individuals x 2]. • Concern over viability of 50% affordable housing as has not been achieved previously [Abergavenny Transition Town]. • Suggest this objective does not acknowledge the need for market housing or the important role this plays in addressing affordability issues suggest it is amended to include 'market homes'. Fails to recognise market housing is a lead delivery agent of affordable and low cost homes [Vistry & Redrow Homes]. • Suggest the provision of 50% on site should be revisited stating it is not achievable in the spatial planning context and will lead to a failure in the plan as allocations are not likely to be viable based on the Plan requirements [Redrow Homes]. • Support importance of providing new affordable housing, note delivering sufficient housing growth both affordable and market will be critical if other objectives identified in the plan are to be achieved [Richborough Estates]. • Refer to use of 'urgently' stating this is not usual policy language and creates a lever for inappropriate development to be pushed through. Concern over use of 'exemplar' questions how this will be enforced [Cllr Christopher Edwards & Private individual x 1]. • Refer to objective 10 stating this will not be achieved as not likely to receive sufficient subsidy from Welsh Government to ensure the provision of 50% affordable housing [Cllr Louise Brown]. • Affordable housing is rightly identified as a key issue for the County, concern developers may argue viability following allocation to reduce percentage of affordable housing and planning obligations [Tompkins Thomas Planning]. • State building affordable homes is an excellent idea but do not think that continuing to build 3, 4 and 5 bedroom market homes is, suggest instead should concentrate on single storey homes/bungalows to allow downsizing to open up the market [Private individuals x 4]. • Refers to Objective 10 suggesting this recognises the need to provide for a level of housing sufficient to enable a wide-ranging choice of homes both for existing and future residents and supports the need for new homes in Monmouth [Edenstone].
Objective 11 (Placemaking)	• Refer to Objective 11 and note 'exemplar' should be removed from wording and replaced with 'good quality' instead as this is considered a constraint that could slow down delivery of the plan [Home Builders Federation]. • Suggest this largely repeats Objective 10 [Abergavenny Transition Town]. • Suggest this is very subjective with aims open to developer spin and influence. Suggest language is more focussed on measurable characteristics [Cllr Christopher Edwards & Private individual x 1]. • Support objective [Edenstone].
Objective 12 (Communities)	• Welcome and support objective 12 [Theatres Trust]. • Suggest this should be reworded to 'urban communities' as there is already an objective specifically for 'rural communities' and they cannot have good access by active travel [Abergavenny Transition Town]. • Note this will be reliant on delivering sufficient levels of growth capable of sustaining and enhancing the most sustainable settlements [Richborough Estates]. • Refers to Objective 12 suggesting this recognises the need to provide for a level of housing sufficient to enable a wide-ranging choice of homes both for existing and future residents and supports the need for new homes in Monmouth [Edenstone].

Objective 13 (Rural communities)	• Welcome growth being directed to a degree towards Secondary Settlements and Main Rural Settlements [Llanover Estates, Leathdunn Ltd., Johnsey Estates 2020 Ltd & The Coldbrook Estate]. • Strongly suggest a distinction should be made between small, isolated settlements and the wider rural community as a whole, suggest changing objective to 'thriving and sustainable settlements that are founded within the rural way of life' [Melin Homes, Llanarth Estates, Tirion Homes, Candleston Homes, Sero Homes, Sero & Private individuals x 2]. • Suggest a lot of affordable housing additions will be required in order to sustain rural communities, suggest those closest to Primary and Secondary Settlements will offer easy access to markets and provide an expanded horticultural growing sector [Abergavenny Transition Town]. • Agree with this objective, not the appropriate distribution of new development to key rural settlements particularly those higher in the hierarchy will be critical to achieving this objective [Richborough Estates]. • Support objective, suggest focus should be on brownfield sites that are not isolated in the countryside that have a relationship with urban settlements to prevent longer journeys [Private individual x 1].
Objective 14 (Infrastructure)	• State no figures are provided on how much broadband digital roll out is falling short of targets and the timescales this will be remedied [Abergavenny Transition Town]. • Note reference should also be made to the need to identify infrastructure capable of resolving the phosphate issue affecting the Upper River Wye catchment [Richborough Estates]. • Suggest this fails to note the lack of infrastructure in the south of the County, state this is currently at breaking point in Chepstow and surrounding areas [Cllr Louise Brown & Private individuals x 3]. • Suggest the need for appropriate physical and digital infrastructure should be assessed on a site-by-site basis in context to the scale of development proposed [Edenstone].
Objective 15 (Accessibility)	• Support the use of private car as the last option for travelling [Abergavenny Transition Town]. • Welcome objective recognising accessibility can be achieved via a variety of means [Richborough Estates]. • Use of wording is questioned suggesting to 'seek to' and also 'provide opportunities for' is creating an excuse to fail and therefore weak and non-committal. Suggest should instead have a policy to improve transport connectivity, safety, frequency and reliability [Cllr Christopher Edwards & Private individual x 1].
Objective 16 (Culture, Heritage and Welsh Language)	• Support Objective 16 in the context of the Welsh language but it is unclear how the Council intends to achieve this [Welsh Language Commissioner]. • Suggest tourism shouldn't be included in this objective as many aspects demote the use of Welsh language [Abergavenny Transition Town]. • Suggest this objective won't be achieved as traffic queues will prevent repeat tourism visits [Cllr Louise Brown].
Objective 17 (Climate and Nature Emergency)	• Disappointed Climate Crisis is the last objective, state would like this to be the principal objective overarching the RLDP [Abergavenny Town Council & Abergavenny Transition Town]. • Question whether it is possible for Monmouthshire to achieve this, suggest it cannot be monitored and should therefore be reworded to indicate the Council 'will play a part in wider global ambitions' [Home Builders Federation]. • Welcome inclusion of reference to a zero Carbon County in line with Monmouthshire's declaration of a climate emergency [Melin Homes, Llanarth Estates, Tirion Homes, Candleston Homes, Sero Homes, Sero & Private individuals x 2]. • Welcome the change to reflect the climate emergency, remain of the view that a commitment to carbon zero should be made and assessed through the candidate site process [Melin Homes & Llanarth Estates]. • Note there is no mention of lowering the carbon footprint of in-commuting [Abergavenny Transition Town].

	• Acknowledge and support the change of wording in this objective, particularly support the commitment to deliver 'net zero carbon ready new homes' [Natural Resources Wales]. • State this is too high level to be deliverable at a site development scale, suggest it belongs better in the vision as it cannot be measured [Cllr Christopher Edwards & Private individual x 1]. • Suggest objective 17 won't be achieved as air quality will not be improved due to extra traffic flows in a small area in the south of the County. [Cllr Louise Brown]. • Rightly acknowledges the climate emergency as a key factor, need to ensure all site allocations are capable of meeting these provisions whilst remaining viable [Tompkins Thomas Planning]. • Suggest rewording 'To strive to limit the increase in global temperatures to 1.5°C' to 'To strive to pursue policies and action which contribute to the international goal of limiting the increase in global temperatures to 1.5°C' as it implies MCC policies could have this effect [Private individual x 1]. • Refer to objective wording 'provide ultra-low emission vehicle charging infrastructure' suggest replacing this with 'the provision of appropriate measures to reduce vehicle emissions' as in a rural farming county there are many diesel vehicles, the rewording would cover all possibilities [Private individual x 1]. • Suggest the zero carbon requirement for new homes may put off developers given the expense [Usk Civic Society]. • Suggest building in the south of the County encourages out-commuting [Private individuals x 2]. • Refer to wording suggesting 'to strive to limit the increase' is vague wording and should instead be 'has committed to limit'. Questions what 'strengthened emphasis on nature recovery' means. State wording should be specific, targeted and meaningful due to the emergency [Private individual x 1]. • Question the link between the Monmouthshire Public Service Board Well-being plan objective and the Welsh language in objective 16 [Private individual x 1]. • State this objective is well defined and will help to ensure climate change and nature emergencies are effectively recognised and actioned [Private individual x 1]. • Suggest given the broad nature of climate change policies covering the topic should be prescriptive to particular types of mitigation and considered on a site-by-site basis [Edenstone].
Objectives general	• Refer to objectives that have increased emphasis in light of Covid-19, suggest objectives 11, 12, 15 and 16 are also of increased importance as they form part of the Welsh Government's Placemaking and the Covid-19 recovery planning guidance Building Better Places (July 2020) [Redrow Homes Limited & Barwood Development Securities Limited]. • State the objectives are aspirational and welcomed but not convinced based on evidence provided they are fully achievable within the existing statutory planning regulations and functions [Abergavenny Town Council]. • Suggest green tourism is missing from the objectives, suggest this can bring in younger visitors to the area [Private individual x 1].
Missing challenges	• State there are a number of challenges that are not specifically addressed: Covid 19/Recession/Cost of living crisis, Phosphates, Rural core of the Authority, Capacity of infrastructure, Constraints to main settlements, Commuter challenges [Melin Homes, Llanarth Estates, Tirion Homes, Candleston Homes, Sero Homes, Sero & Private individuals x 2]. • Refer to quality of existing housing in terms of insulation, carbon footprint, suggest this should be included as a challenge [Private individual x 1].
Area specific – Chepstow	• Refer to Chepstow as being 'The Green Gateway to Wales' state this will be lost if the RLDP vision is put into practice [Private individual x 1]. • Concern over the lack of support for the high street in Chepstow, stating it is in gradual decline. State it is not a one strategy fitting all case and that other centres operate differently [Cllr Christopher Edwards & Private individuals x 2].

	• Refer to the national green belt stating the spread of Chepstow towards the boundary should be resisted [Cllr Christopher Edwards, Cllr Louise Brown & Private individual x 1]. • State the South East Wales Metro Project will provide no benefits for commuters from Chepstow due to service frequency and reliability, suggest there is no confidence in adequate investment supporting the growth of Monmouthshire [Cllr Christopher Edwards & Private individual x 1]. • State the vision represents a planner's utopia and is therefore aspirational, suggest it lacks local flavour. Consider County boundaries are not relevant to how people live their lives and that Chepstow is likely to experience this more than other towns. Question how the vision can better reflect the reality of lives without administrative borders [Cllr Christopher Edwards & Private individual x 1]. • Refer to objective 14 stating significant investment will be needed to bring current facilities in Chepstow up to an appropriate standard which is beyond the scope of S106 or other developer contributions, question how the Council will ensure there is improvement to these infrastructure needs before allowing growth to continue [Cllr Christopher Edwards & Private individual x 1]. • Refer to road infrastructure needed prior to new housing in Chepstow, concern over lack of response from Welsh Government for improvements to High Beech roundabout [Cllr Louise Brown]. • Concern there is no mention of impact of developments in Forest of Dean on Chepstow in this section, refers to the need for a by-pass and a need for road infrastructure to come first [Cllr Louise Brown & Private individual x 1]. • State the particular issues of Chepstow and the Severnside area are not taken in a coherent integrated way, should recognise the areas importance as an environmental resource and link between the Newport/Cardiff and Bristol areas [The Chepstow Society]. • Refer to the Bayfield allocation suggesting it contradicts objective 3 as it adjoins the AONB and is at odds with objectives 12 and 14 [Private individual x 1]. • While note the vision and objectives seem fair they try to meet different targets, concern over increase in Chepstow over recent years, the RLDP will worsen existing infrastructure issues [Private individuals x 2]. • Question why there are no proposals for hi-technology in the Chepstow area suggesting this is a missed opportunity to cater for the expanding industry as Bristol has reached capacity [Private individual x 1].
Area specific – Severnside	• Suggest encouraging developments in Severnside will affect goals of encouraging use of the Welsh language as likely to be people moving in from Bristol and the South East [Private individual x 1]. • Refer to Caldicot East site stating it will negatively impact the health and well-being goals by depriving the locality of green space and the tourist attraction of the David Broom Event Centre [Private individuals x 2]. • State the well-being objectives will not be achievable for Caldicot East, the exclusion of a site in Monmouth disproportionately affects the Severnside area [Private individual x 1]. • Refer to placemaking and need to develop appropriately to ensure balanced and attractive places to live, suggest the Caldicot East site results in overdevelopment and would result in a negative impact on communities in Severnside [Private individuals x 2].
Area specific – Abergavenny	• Refer to greenbelt study and sites in Abergavenny, state this should take place before sites are considered for development/protection [Private individual x 1]. • Question how jobs are expected to appear in alignment with the proposed addition of 500 dwellings in Abergavenny as it is not in the Cardiff Capital City Region Deal area, suggest unlikely to see benefits [Private individual x 1].
Area specific – Monmouth	• State the vision will be difficult to achieve in full on a County wide basis without the identification of any new housing/economic allocations in the Upper River Wye Catchment [Richborough Estates].

	• Support a strategic site allocation in Monmouth subject to the solution to the phosphates issue, need to ensure the RLDP realises the role Monmouth has in contribution to sustainable growth of the County to 2033 [Richborough Estates, Vistry Group, Edenstone & Private individual x 1].
Site specific - other	• Refer to CS0242 Land north of New House, Llangybi suggest objectives 3, 4, 5 and 14 cannot be met and would not meet statutory obligations under section 6 of the Environment Act (Wales) 2016 to protect the environment [Private individual x 1]. • Refer to CS0113 Castle Oaks Site D, CS0039 Land at Little Castle Farm & CS0282 Land north of Burrium Gate stating these would increase the volume or concentration of wastewater resulting in phosphate impact. Suggest they would not meet objectives 4, 12, 14 or 17 [Private individual x 1].
Promotion of sites	• Promote CS0103 Land adjacent Berthon Road, Little Mill noting the ranking of settlements should be considered. Suggest the site aligns with Objective 13 [Monmouthshire Housing Association]. • Promote CS0247 Coopers III noting the Deposit Plan should continue to direct development and investment to the County towns, including this site [Johnsey Estates 2020 Ltd]. • Promote CS0105 Land at Former Goods Yard, Usk noting development of this land offers an opportunity to help achieve Objective 6 and in respect of Objective 4 opens an opportunity to redevelop a brownfield site with measures that can improve flood resilience and incorporate sustainable drainage principles [Private individual x 1]. • Promote CS0111 Land adjacent Thistledown Barn, Shirenewton noting Objectives 10, 12 and 13 can all be met [Private individual x 1]. • Promote CS0128 Land at Chapel Farm noting it can fully support the vision [Hallam Land Management]. • Promote CS0269 Land at Grove Farm, Llanfoist for a mixed-use care village noting it can deliver the vision, objectives and assist in key issues [Grove Farm Estates & Development]. • Promote CS0274 Land to the north of Wonastow Road as it represents an appropriate opportunity for a sustainable mixed use strategic allocation for the settlement [Richborough Estates]. • Promote CS0271 Land at Vauxhall Fields, Monmouth noting this aligns with the vision and will contribute to the achievement of the 17 RLDP objectives [Edenstone Group]. • Promote CS0165 noting this aligns with the vision and will contribute to the achievement of the 17 RLDP objectives [Barwood Development Securities Limited]. • Promote CS0206 South of Newport Road, Magor noting this aligns with the vision and will contribute to the achievement of the 17 RLDP objectives [Edenstone]. • Promote CS0280 Land at Walnut Tree Farm, Penperlleni noting this aligns with the vision and will contribute to the achievement of the 17 RLDP objectives [Edenstone]. • Promote CS0189 Land at Tudor Road, Wyesham noting it is sustainable and can contribute to the Council's Vision and Objectives, delivering a '20-minute neighbourhood' [Edenstone].
Other	• Concerned over the emphasis on residential development with insufficient employment land allocation [Abergavenny Town Council]. • Suggest the issues, vision and objectives are well meaning but vague with no mention of the need to react to climate change [Abergavenny & Crickhowell Friends of the Earth]. • Suggests there is a conflict between becoming a zero carbon County and significant expansion of secondary settlements which will sharply increase commuting, state there is no evidence that the number of houses provided reflects what the population really need or population growth. Also concerned the evidence is based on an out of date census [Private individual x 1].

	• Suggest table of objectives informed by the PSB Well Being Plan creates a utopian wish list with a lack of hard focus on actions on the climate and nature emergency issue [Abergavenny Transition Town]. • A further matter for consideration is delivery immediately after the RLDP is adopted to ensure the implementation of the plan is possible in the remainder of the plan period [Leathdunn Ltd. & Johnsey Estates 2020 Ltd]. • Note Future Wales provides a positive basis for growth, disagree with Welsh Governments approach that suggests growth will undermine delivery of the National Plan [Redrow Homes & Richborough Estates]. • State the RLDP should make specific allocations for older peoples housing including care provision [Grove Farm Estates & Development]. • Suggest the plan period should be extended to cover an increased timescale beyond 2033 with associated amendments to the RLDP housing requirement [Edenstone Group & Edenstone]. • State housing numbers are too high and question where the evidence of jobs is and who will provide them, significant investment would be needed [Private individual x 1].

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

90 organisations or members of the public submitted a response to question 2.

Given the overlap with the Preferred Strategy and the policy content of S1 – Growth Strategy and S2 – Spatial Distribution, there are similarities in the answers given to consultation questions 2, 3 & 4. A range of comments have been made on the Preferred Strategy, with some representors in broad support, others suggesting the Strategy is not ambitious enough and other suggesting it is too high. There was a recognition on both sides that the Preferred Strategy represents a compromised approach to addressing the County's issues and challenges whilst also addressing Welsh Government's objections to the previous Preferred Strategy (2021).

General support given to the distribution of growth, focused on the Primary Settlements, however, more evenly dispersed growth across settlements, including Monmouth and lower tiers was raised. Concern was raised at the level of growth focussed in the south of the County.

In terms of the housing supply components, the consensus is that the flexibility allowance is too low with a 20% or 25% flexibility allowance suggested as more appropriate rates. An over-reliance on windfall/infills and existing commitments was expressed. Similarly, concerns were raised in relation to an over reliance on a small number of strategic sites and the potential impact on delivery homes and affordable homes within the plan period.

Key themes raised in relation to Question 2 on the Preferred Strategy are set out below:

Key Theme	Summary of Points Raised
Growth level represents compromise and is supported.	• Growth level is a more appropriate fit with FW 2020. The PS is in general conformity with Policies 1, 7 and 33 of FW 2020 and does not undermine the role of Cardiff, Newport, and the Valleys as the main focus for growth and investment in the Southeast region but reflects the urgent need to increase the supply of affordable housing in Monmouthshire. [WG] • Growth level represents a compromise between the 2021 Preferred Strategy and Welsh Government prescribed level. [Abergavenny Town Council, Private Individual, Abergavenny & District Civic Society] • PS provides a clear direction to enable sustainable growth across the County over the Plan period. [Llanover Estates, Leathdunn Ltd, Johnsey Estates, MHA, Vistry Group, Coldbrook Estate] • Recognised the revised PS responds to a number of challenges including WG's objection and water quality issues. [Hallam Land Management, Edenstone]

Growth Level is too low	• Proposed growth level will not deliver enough homes to satisfy current needs. [Chepstow Town Council, BB3 Ltd, Richard Willett, Manor Farm Partnership, Private Individuals x 3] • Disappointment at the significant reduction in the housing provision number from that justified by evidence in the previous version of the PS question whether the revised option enables a sufficiently aspirational vision and strategy for the Plan [Barratt & David Wilson] • Approach taken seems to have been entirely shaped by Welsh Government's policy position requiring a low growth approach rather than an approach that is capable of providing the more positive planning intervention required to address the issues identified. Higher growth option should have been considered based on the evidence and significant issues facing the County. [Melin Homes, Llanarth Estates, Tirion Homes, Candleston Homes, Sero Homes, Sero, Private Individuals x 2] • Acknowledge the Council has had to temper the level of growth pursued due to WG's objection, however, question whether the evidence base supports the reduced level of growth. Growth level does not provide sufficient growth to redress negative demographic trends for Monmouthshire and harness its economic potential. [Edenstone, Barnwood Development Securities Ltd] • PS leaves the Plan without a clear strategy to deliver the housing needed by Monmouthshire and does not follow logically from the identified Key Issues, RLDP Vision and RLDP Objectives. It therefore fails to satisfy Soundness Tests 2 & 3. Disagree with the WG assertion that by meeting its evidenced growth needs the RLDP would undermine delivery of the FW 2020 growth area. [Redrow] • Increase in housing supply should be pursued to address affordability issues rather than a blanket 50% affordable housing requirement. [Edenstone]
Growth level is too high	• Housing target is excessive and contrary to FW 2040 creating a risk to the adoption of the RLDP. [Llanarth Fawr CC; Raglan CC, Private Individuals x 6, Cllr Louise Brown, Chepstow Society, Cllr Christopher Edwards] • PS growth level is contrary to a number of the RLDP objectives and will attract people from outside the County exacerbating out-commuting and worsening the affordability issues [Private Individual x 3] • Housing requirement figure is excessive – WG's view is that it should be no more than 4,725 dwellings. Danger that an excessive housing target will cascade excessive development down to Secondary Settlements of Raglan, Usk and Penperlleni. [Raglan Village Action Group, Usk Civic Society, Private Individual]
Spatial Distribution	• Proportionate growth distribution is welcomed. [Dwr Cymru] • Support general approach, however, the Deposit Plan should place greater value on the Main Rural Settlements to accommodate growth. [Llanover Estates, Coldbrook Estate] • Support for focus on growth in the County's most sustainable primary settlements [BDW] • Over provision in the south of the County, which will exacerbate out-commuting and loss of young people and place strain on inadequate infrastructure. [Melin Homes, Hallam Land Management, Llanarth Estates, Cllr Louise Brown, Private Individuals x 7, Tirion Homes, Candleston Homes, Sero Homes, Sero] • Focus of development in the south of the County contrary to FW2020 as intention is for a Green Belt in the area. [Cllr Louise Brown, Private Individual] • Inappropriate and unsound to rule out long term policy intervention such as a new settlement without fully considering the benefits it can bring. [Melin Homes] • Step change in approach, such as a new settlement, required if the Council is to address the issues facing the County. Adding incrementally to existing settlements alone will not achieve aims. [Llanarth Estates, Tirion Homes, Private Individual] • Increase distribution and provision at lower tier settlements [MHA, BB3 Ltd, Manor Farm Partnership, Coldbrook Estate, Private Individuals x 6] • Greater proportion of growth should be apportioned to Chepstow. [Barwood Development Securities]

	• NRW's understanding is that Llanfoist WwTW (along with Monmouth WwTW) have been identified in the National Environment Programme (NEP) as requiring investment to reduce phosphorus discharges. These have been proposed for improvements in AMP8 (2025-2030), however some uncertainty remains as to whether the investment will be confirmed until the water company business plans have been reviewed and agreed by OFWAT. Therefore, if DCWW have advised that investment at Llanfoist can be brought forward from AMP8 to AMP7 with early completion of the improvement works by 2025, this needs to be evidenced. Situation with River Wye Catchment and solution at the Monmouth WwTW may change within the Plan period. [NRW] • The completion of over 1400 homes at Caldicot (including Severnside) is ambitious, particularly that upon adoption the plan will only have eight years remaining in the plan period. A re-distribution of sites to include additional allocations across the County would de-risk the Plan. [Johnsey Estates] • Not clear how the most sustainable rural sites are being identified - many are declining in terms of facilities. [Llangybi Fawr CC] • Willingness to allow housing development in rural areas should be brought together with the aim of strengthening the rural economy, by creating small farmhouses. [Our Food 1200]
Settlement Hierarchy	• Little Mill should be recategorized as a Tier 2 Settlement. [MHA]
Strategic Sites/Delivery	• Spatial strategy realises the importance of focussing growth in the County's primary and secondary settlements but could be considered to over-rely on two large strategic sites [Lethdunn Ltd, Johnsey Estates]. • The ability of the large Strategic Sites to deliver the number of units allocated in the PS is questionable, given challenges in the County and adoption not scheduled until summer 2025. A greater number of small/medium allocations is considered essential to make up for this potential shortfall in delivery. [Hallam Land Management]
Monmouth Growth	• DWR Cymru – given the significant levels of iron at Monmouth WwTW the design of phosphorous removal scheme requires careful planning. Phosphorus permit limit following the review of permits needed and regulatory sign-off from NRW. However, the commitment is there to undertake necessary works. [Dwr Cymru] • HBF do not agree with the Monmouth sites can be classed as 'bonus sites' within the context of the definition set out in the Development Plans Manual. [HBF, Private Individual] • RLDP evidence base recognises the role Monmouth in the County. There should be allocations for housing made at Monmouth [BB3, Manor Farm Partnership, Vistry Group, Private Individuals x 4] • As set out in the DcWW Improving our River Water Quality (2022) document a £70 million commitment is also being made to reduce phosphate outputs from the WwTW in the River Wye (page 26). With a plan and funding commitment to resolve the phosphates issue moving forward from Monmouth WwTW as well as alternative mitigation routes being explored, there are no planning reasons not to allocate in the Wye Catchment. PS approach to Monmouth would result in no delivery of new housing allocations in Monmouth until 2032, having significant adverse economic and social impacts for Monmouth. [Redrow] • PS is not aspirational as it does not include additional developments in the North of the County and assumes there will be no solution to the river phosphates issue during the Plan period. [Cllr Louise Brown]
PS Priorities	• Prominence given to climate change and delivery of affordable housing is welcomed. [FoD] • Welcome policy shift from previous PS to prioritising land allocation for affordable housing and net zero ready homes and range and mix of house sizes. [Abergavenny Transition Town, Private Individual] • PS has made positive steps identifying and addressing the climate emergency, most notably reference to becoming a zero-carbon county. Welcome inclusion and reference to the nature emergency, however it is unclear how the policy framework practically seeks to deliver actions that tackle the nature emergency. [NRW]

	• Affordable housing threshold should not apply to windfall site. [Private Individual] • Supportive of a move towards zero carbon and believe an ambitious target should be set. [Melin Homes, Llanarth Estates, Tirion Homes, Candleston Homes, Sero Homes, Sero, Private Individuals x 3]. • Providing affordable housing in where there are no employment opportunities and rail connections makes no sense – blanket affordable housing requirement inappropriate for this reason. [Private Individual] • More effort/consideration should be given to remedial action to address phosphate and other water issues in the Wye. [Private Individual] • Reference to the role and opportunity presented by community led affordable housing would be beneficial. [Cwmpas] • Focus should be on making nice place to live, not building more houses. [Private Individual] • Not enough emphasis on transport issues. [Private Individual] • Stronger focus on energy efficient homes is needed. [Private Individual]
Potential failure to deliver core strategy components	• Risk that zero carbon objectives, extra jobs and extra infrastructure will not be in place in parallel with housing growth resulting in less sustainable settlements. [Abergavenny Town Council, Abergavenny & District Civic Society, Private Individual] • Power network will be a significant constraint on development of renewable energy generation systems and distribution of such energy [BB3 Ltd, Manor Farm Partnership, Private Individuals x3] • RLDP should also cater for the older population. [Grove Farm Estates & Development, Chepstow Society) • Ratio of affordable homes is unrealistic along with zero carbon aspirations. [Mathern CC, Private Individual] • Infrastructure and accessibility insufficient to deliver PS aims and objectives. [Private Individuals x 6, Cllr Louise Brown] • PS will fail to deliver its key aims and objectives and will therefore fail the Tests of Soundness. [Cllr Louise Brown] • More integrated approach needed to improving transport infrastructure and other infrastructure in and near Chepstow. [The Chepstow Society, Private Individuals x 4]
Cross Boundary Issues	• FoD keen to work collaboratively to bring about sustainable solutions to cross boundary transport issues. [FoD] • GCC broadly support stated aims regarding climate and decarbonisation. The importance of reducing transport associated carbon, pollutants a nuisance is paramount and the need to work cooperatively across the Welsh and English border is fundamental to the successful delivery against the zero-carbon agenda. [GCC] • Essential to demonstrate how the targeted increase in population/jobs is consistent with other LDP strategies in the CCR. The level of growth proposed does not harness the economic opportunity presented by the CCR City Deal. [Edenstone] • Levels of growth for individual LPAs should be agreed at a strategic level through the preparation of an SDP. [Private Individual] • Has development across the border been considered? [Private Individual]
Flexibility Allowance	• Increase flexibility allowance to ensure the timely delivery of sites. [MHA, Private Individual] • Prudent to increase the flexibility allowance in light of the substantial reduction in growth that is now proposed [Hallam Land Management, Edenstone] • 20% flexibility allowance should be adopted to provide greater contingency to allow for unforeseen circumstances over the plan period, which will be important given the current economic climate and reliance on a small number of strategic sites to deliver a significant component of the RLDP's housing requirement. [Edenstone] • Flexibility allowance is not needed and is likely to be exploited by the developers [Private Individual, Cllr Christopher Edwards]
Windfall/Small Site Allowance	• The PS has an over reliance on windfall provision which presents a risk to achieving the level of growth required. To de-risk the Plan less reliance should be given to windfall sites [Leathdunn Ltd, Johnsey Estates] • Ban on windfall sites in the Wye Catchment is an overreaction to an issue caused primarily by agriculture. [Private Individual]

Jobs Growth	• Creation of 6,240 jobs is difficult to believe, especially noting the large reduction in current employment opportunities forecast. Economic Development Strategy needed. [Private Individual, Cllr Christopher Edwards] • Given the continued lack of clarity about the economic growth and how it will be achieved, an Economic Development Strategy is needed. [Private Individual] • Surprised to see the removal of SAE1h Land at Pill Row. [FI Real Estate Management Ltd] • No evidence to support and drives the jobs growth figure. [Private Individual]
Lacking details/information	• Question what the Council understand by 'new homes are net zero ready' and how it will be assessed and by whom. [HBF, Private Individual] • PS contains well-meaning but vague statements – Deposit plan must correct this. [Abergavenny & Crickhowell FoE] • Key evidence required for the Deposit Plan including economic growth levels, relationship to adjoining local authorities, ensuring the delivery of 50% affordable housing allocations, site delivery and viability, phosphates and nutrient neutrality and Gypsy and Traveller Accommodation. [WG]. • There is no definition included of an 'Affordable Home'. [Private Individuals x 2] • Data and statistics feeding into the strategy must be examined in more detail to explain the level of growth. [Private Individuals x 2]
Site Promoted in response to Question 2	• Leathdunn Ltd – CS0036 – West of B4293, Devauden [Leathdunn Ltd] • Johnsey Estates – CS0247 – Cooper III [Johnsey Estates Ltd] • Hallam Land management – CS0128 Chapel Farm [Hallam Land Management] • Grove Farm Estates – CS0269 – Grove Farm [Grove Farm Estates] • Johnsey Estates Ltd – CS0113 – Castle Oaks (Site D) [Johnsey Estates Ltd] • Johnsey Estates Ltd – CS0282 – NW Burrium Gate [Johnsey Estates Ltd] • Barwood Development Securities – CS0165 Mounton Road [Barwood Development Securities]

Question 5 – Do you have any comments on Strategic Policy S3 Sustainable Placemaking & High Quality Design?

37 organisations/private individuals submitted a response to question 5.

There was general support to Strategic Policy S3. Some changes to the existing policy wording were put forward and questions relating to the definition of some of the terms noted within the policy.

Green Infrastructure was referred to in a number of representations, with support for its inclusion but also whether the approach should always be led by Green Infrastructure.

Key Theme	**Summary of Points Raised**
Support policy	• The Canal & River Trust fully support policy noting it is in line with their own guidance [Canal & River Trust]. • Support in so far that it aims to ensure development contributes towards creating high quality, attractive and sustainable places that support the well-being of the community [Melin Homes, Monmouthshire Housing Association, Richborough Estates, Llanarth Estates, Tirion Homes, Candleston Homes, Sero Homes, Sero, Private Individuals x 4]. • Support the principle of the policy and recognise the importance of placemaking in good design [Redrow Homes]. • Support policy in principle and consider site promoted could be carried out with full regard to the aspiration of the policy [Grove Farm Estates & Development]. • Support policy, particularly criterion iv) [Cllr Louise Brown]. • Agree high quality design is essential [Tompkins Thomas Planning] • Broadly agree with the wording and thrust of policy, consider site promoted will achieve the aspirations of this policy [Marston's PLC].

	• Site promoter prides itself on design excellence and providing high quality homes that would align with this policy [Edenstone].
Changes suggested to policy wording	• Additional wording should be included to recognise the way in which developments are required to meet this policy will in part depend on the scale of development. Reference to PPW11 noting placemaking should not add additional cost to a development [Home Builders Federation and Barratt & David Wilson Homes]. • Suggest part ii) is amended to 'incorporate a mix of uses where appropriate to minimise the need to travel and provide sustainable transport links to maximise opportunities for active travel and public transport use' [Vistry]. • Refer to criterion ii) noting this should be expanded to acknowledge the role promoting the ability working from home can play in terms of minimising the need to travel [Richborough Estates] • Supporting text should state criterion ii) could be achieved either through bringing forward mixed use developments, or through the appropriate location of new development alongside other existing uses [Richborough Estates]
Support prominence given to GI.	• Welcome proposals for placemaking and the prominence given to Green Infrastructure in design considerations [Abergavenny Town Council].
Development to be built to net zero carbon	• Disappointed there is no commitment for future development to build to net zero carbon to meet the declared climate crisis objectives [Abergavenny Town Council].
Question whether approach to design should be led by GI	• Question whether the approach to design should always be led by Green Infrastructure, good design responds to all aspects of the context, opportunities and needs of the site [Abergavenny & District Civic Society and Abergavenny Transition Town]. • Note S3 is supplemented by S17 relating to GI, suggest a further strategic policy is equally needed covering the built environment and heritage [Abergavenny & District Civic Society].
Terms used	• Refer to terms such as 'high quality', 'high standard' and 'good design' noting these are difficult to pin down legally and precisely when applied to development. Suggest policy should include reference to insist such development should be reviewed and approved by the Design Commission for Wales [Abergavenny Transition Town]
Impact on viability	• Concern that the driver to design will place overly onerous conditions on planning to the threat of viability. Any additional requirements that might impact further on development costs need to be highlighted at an early stage of the planning process so they can be taken into account in assessing land values and the viability process. Urge caution in respect of being overly prescriptive and ensuring any targets associated with S3 are considered alongside other policy objectives to ensure the plan does not affect deliverability [Redrow Homes].
Other	• Comment noting new housing developments are being approved with inadequate road systems [Private individual x 1]. • Questions relating to detailed biodiversity matters that would be dealt with at a planning application stage on a site by site basis [Private individual x 1] • Question relating to whether CADW, National Trust etc are consulted on applications [Private individual x 1]. • Nothing in policy to future design houses to incorporate home working or flexible living arrangements to allow for intergenerational living, 3 or 4 storey dwellings may be appropriate rather than a focus on 2 storey [Private individual x 1]. • Note development of greenfield sites is not sustainable, reference give to the Bayfield site [Private individual x 1]. • Suggestion the policy is a marketing ploy to gain agreement [Private individual x 1]. • Sustainable development cannot acceptably replace mature and biodiverse ecosystems [Private individuals x 2]. • Focus on building houses not actually making areas a nice place to live [Private individual x 1].
Question 6 – Do you have any comments on Strategic Policy S4 Climate Change?	

61 organisations or members of the public submitted a response to question 6.

The overarching principles of the policy were generally well received, although the need for further guidance on the definition of net zero ready and the need to factor in viability were highlighted. There were also concerns that the Preferred Strategy and its allocations are contrary to the principles of climate change.

Key Theme	Summary of Points Raised
Welcome Climate Change aims	• Welcome the PS's focus on active travel, sustainable transport, and the Plan's commitment to net zero carbon developments. [Chepstow Town Council, NRW, Tompkins Thomas Planning] • Welcome the promotion of water efficiency measures and minimising the impact on water resources and quality. [Dwr Cymru] • Welcome policy aims but they should be applied to new allocations on a site-by-site basis and with regard to viability. [Melin Homes, MHA, Hallam Land Management, Llanarth Estates, Edenstone Group, Marston's Plc, Edenstone, Tirion Homes, Candleston Homes, Sero Homes, Sero, Edenstone, Private Individuals x 2] • Welcome policy but reference to public transport via electric buses and protection of GI and open space should be added. [Cllr Louise Brown]
Definition/viability	• Further guidance required on the definition of net zero developments and how they will be measured. [B&DW, Vistry, Bellway Homes] • Further guidance regarding the targets and measures are required to fully assess the viability impacts, allowing sites to be considered on a site-by-site basis. [Edenstone Homes, Redrow Homes, Grove Farm Estates & Developments, Redrow Homes, Richborough Estates, Barwood Development Securities Ltd, Edenstone, Private Individuals x 2,] • Concerned whether the policy requirement is supported by the relevant evidence base and appropriate viability assumptions to ensure it is justified and meets the test of soundness. [Taylor Wimpey]
Further details/evidence needed	• More rigorous policy on the energy efficiency of buildings and construction required. [Abergavenny & District Society, Private Individuals x 4] • Little reference to building design or recommendations for low energy solutions to facilitate the reduction in emissions for residential developments. [Abergavenny Town Council] • New development can only play a part in not adding to the causes of climate change. [HBF, B&DW] • Should include policies elsewhere aimed at reducing car use and commuting. [Private Individual] • Undertake further work on the contribution renewable energy can make to assist with climate change and decarbonisation. [WG] • Policy could go further and seek to improve, where possible, flood risk to existing communities. The SFCA could consider opportunities for these to assessed at a local/site level. [NRW]
Site Specific	• Ensure all development is compliant with TAN15. [WG] • To achieve climate change requires sustainable communities that do not require residents to have to travel excessively to access facilities. [Llangybi Fawr Community Council] • County Farms to the south of the County should be considered for solar farms. [SOUL] • Sifting out of candidate sites based on TAN 15 must be less didactical and more flexible. [F1 Real Estate Management Ltd] • Given the worsening climate emergency, associated investigations and appropriate flood risk management proposals need to be agreed before any allocations are made. [Private Individuals x 2] • SABs and SUDs need to be considered. [Private Individual] • Development in the south must take account of flood risk and the environmental impact of traffic. [Private Individual]

	• Increased traffic particularly the Hardwick Hill will affect health and the climate. [Private Individuals x 2] • Candidate sites need to be tested against policy principles. [Private Individual]
RLPD contrary to policy	• Cumulative impact and failure to protect GI on the levels is inconsistent with the principles of nature conservation and declaration of climate and nature emergency. [Cllr Frances Taylor, Private Individuals x 3] • Building on greenfield sites goes against the policy to limit climate change and will increase the carbon footprint. [Private Individuals x 3] • Recent planning permissions, (e.g., Mabey Bridge) make no sense environmentally. [Private Individual]
General	• Include reference to Objective 5 – Minerals and Waste in relation to Policy S4 Climate Change. [MPA] • Climate Change policy should be upfront. [Abergavenny Transition Town]

Question 7 – Do you have any comments on Strategic Policy S5 Infrastructure Provision?

56 organisations/private individuals submitted a response to question 7.

There was some support for the policy. A number of wording changes were suggested, some suggesting the need to be dependent on viability, others wanted more assurance the policy requirements would be met.

The need for an infrastructure plan was noted in time for the Deposit Plan.

Concern was also raised by some in relation to the need for additional infrastructure in relation to proposed strategic sites.

Key Theme	**Summary of Points Raised**
Support policy	• Applaud provisions of policy – particularly the inclusion of 'strategic utilities including; water and sewerage infrastructure' [Dwr Cymru/Welsh Water]. • Fully supportive of policy [The Canal & River Trust (Gandwr Cymru)]. Suggest policy may be improved if there was a requirement to carry out an audit on the existing situation to better inform discussions on what impact there may be and whether remediation is necessary. • Support in principle, suggest it would be useful to explain the justification text in relation to sewage infrastructure in that new development should not result in exceedances in the consented discharge of a WwTW. Also note infrastructure includes all the pipework along the public sewer network [Natural Resources Wales].
Suggested changes to wording	• Suggest changing wording to 'remedy any proven future deficiencies'. Also suggest adding in after 'prior to occupation' the following 'or in an agreed phased approach'. Suggest adding in 'Planning conditions or' before 'Planning Obligations'. After 'acceptable in planning terms' suggest the following is added 'and other policy requirements' [Home Builders Federation]. • Final wording should ensure that requirements are both necessary and viable in accordance with the Development Plans Manual (edition 3) [Monmouthshire Housing Association, Private individual x 1]. • Concern the wording of the policy implies that proposed development will be required to remedy existing deficiencies, which are not directly related to the development or fairly or reasonably related in scale and kind to the development, contrary to Regulation 122 of the CIL regulations. Suggest addition of a number of amendments to the first paragraph [Vistry]. • Suggest a change to wording in paragraph 5.21 replacing 'should' with 'must', noting this surely should be an obligation [Private individual x 1].
Broadband and strategic utilities	• Provision of broadband connections and utilities is a matter for the developer to deal with on a site by site basis and it is not considered appropriate or necessary to provide a financial contribution to facilitate this provision [Monmouthshire Housing Association].

Cultural facilities and strategic utilities	• Do not consider the likes of some cultural facilities and strategic utilities are necessary to ensure a development is acceptable in planning terms [Monmouthshire Housing Association, Private individuals x 2]. •
Road infrastructure	• State there is no mention of road infrastructure in policy [Cllr Louise Brown]. • Suggest the section is low on actual specific interventions. Note the need to improve public transport is very important but requires significant investment given the rural nature of Monmouthshire. States investment in roads is key, refers to buses struggling to get in and around Chepstow as an example [Private individual x 1].
Health infrastructure	• Note this is at the bottom of the list, suggest it can take weeks to get a routine appointment in Caldicot and Chepstow and difficult to get a dentist appointment. Health centres need to be included in strategic sites [Cllr Louise Brown].
Education	• Additional capacity in schools must be confidently delivered before or with any major new developments [Private individual x 1].
Infrastructure Plan	• Support policy aspirations but needs to be established as part of any allocation. Note no infrastructure plan in place, refer to Development Plans Manual which indicates this is an essential piece of evidence, particularly in Monmouthshire given significant constraints in existing main settlements and lack of provision in smaller villages [Melin Homes, Llanarth Estates, Tirion Homes, Candleston Homes, Sero Homes, Sero & Private individuals x 2]. • An infrastructure plan should be prepared to demonstrate how relevant infrastructure to support development will come forward (Development Plans Manual, paragraphs 5.125 -5.128) [Welsh Government].
Management companies	• Suggest greater flexibility should be allowed in the policy wording as it advances to Deposit stage. Current wording of S5 does not make provision for sites managed via a private management company which is often the preference for both the local authority and applicant [Monmouthshire Housing Association, Edenstone and Private individuals x 2].
Adoption of infrastructure	• Question whether wording in policy mean that in no circumstance will the Council adopt any new infrastructure [Home Builders Federation].
Affordable Housing	• Concern over the final paragraph relating to affordable housing noting occupiers are often more reliant on the need for local facilities and infrastructure often required to be delivered by new housing development, question whether such a development would be compliant with other policies in the plan relating to sustainability and placemaking [Home Builders Federation].
Viability	• Welcomes the commitment due regard will be given to overall development viability and clarification that priority will be given to affordable housing [Vistry]. • Obligations associated with development are essential to ensure social infrastructure is in place to accommodate new residents, however overly rigid policies can fail to allow for the specifics of a site and its particular viability. Policy associated with S5 should be clear and easy to interpret but also have inherent flexibility to accept and allow for site-by-site viability [Redrow Homes]. • Suggest if developers make so much money they can contribute more to the necessary infrastructure [Private individual x 1]. • State no means by which to test proposed infrastructure requirements against the viability of potential candidate sites at this stage and as such the policy will require further refinement [Edenstone].
Infrastructure should come first	• Infrastructure should always come first, suggest without it settlements will fail to thrive or fail completely [Llangybi Fawr Community Council]. • Suggests policy creates opportunity for developers to avoid paying required infrastructure contributions if viability assessment demonstrates they can't afford them. To avoid creating further infrastructure stress states the Council must commit to finding those required contributions from other sources before approving development that would create a detriment to infrastructure. Uses Chepstow as an example in relation to WelTAG study that further development would increase levels of traffic and pollution in the AQMA [Cllr Christopher Edwards and Private individual x 1].

	• Policy fails to mention the need to prevent any further development without the road and public transport infrastructure being in place [Cllr Louise Brown]. • No infrastructure in place currently/infrastructure is inadequate, additional housing will exacerbate [Private individuals x 3].
Area specific	• Refer to High Beech roundabout noting development should go hand in hand with measures to address these severe traffic problems. Also note childcare provision, school places and health services must be included in the plan [Chepstow Town Council]. • Refer to an additional junction on the M48 at Caldicot, suggest this would go some way towards relieving some of the pressure on the local road system [Chepstow Town Council]. • For some strategic development sites there is potential for cumulative trunk road capacity impacts, especially at Abergavenny, Caldicot and Chepstow. All strategic sites should be supported by Transport Assessments that are underpinned by the Welsh Transport Strategy and have regard to Active Travel and air quality [Welsh Government]. • Suggestion Severnside is poorly provided with infrastructure, promised in the LDP and not delivered. Services have not grown exponentially with development [Private individuals x 14]. • Reference to supporting text in paragraph 5.20 noting the statement relating to appropriate infrastructure will be scrupulously observed when reviewing suitable rural settlement candidate sites. Reference is made to existing community groups and facilities noting active community collaboration and enterprise play a part in ensuring rural settlements are resilient and sustainable [Private individual x 1]. • Suggestion infrastructure is inadequate in Chepstow, primarily a transport issue as the town is gridlocked most days. State Welsh Government do not currently support a Chepstow bypass. A concrete solution is needed before new houses can be built [Private individuals x 5]. • State Chepstow cannot cope with traffic created by new development in the wider region, traffic from outlying areas all comes through the 'Chepstow bottleneck' often exacerbated by bridge closures due to bad weather. A regional policy approach to traffic through Chepstow is needed [Private individual x 1]. • Note 3 preferred strategic sites have been well assessed against criteria, the smaller candidate sites need to be similarly assessed so as not to over burden existing communities and infrastructure or generate more journeys when the car is the only option [Private individual x 1]. • Refer to Usk noting there is insufficient infrastructure, suggest improvements need to be made to the town before housing [Private individual x 1]. • State the traffic is a problem and increasingly so, state there is no support/contingency of relief roads or affordable public transport. Suggest the walk between Undy and Rogiet is treacherous [Private individual x 1]. • Representor states they have grave concerns given that the current infrastructure cannot cope with the number of citizens in Caldicot at present [Private individual x 1].
Other	• Query why no reference to minerals and waste in S5, note infrastructure provision is reliant on the supply of aggregates and mineral products [Mineral Products Association] • Note developers may be required to fund improvements to water and sewerage infrastructure should they wish to bring forward a development site in advance of regulatory investment. Where insufficient capacity is available and no reinforcement works are programmed within the respective Capital Investment Programme, the requisition provisions (of the Water Industry Act 1991) can be entered into for water and sewerage infrastructure, these requisitions do not apply in the instance of WwTW and as such planning obligations may be necessary [Dwr Cymru/Welsh Water]. • The Library Authority part of Gloucestershire County Council suggest new housing developments will place additional pressure on these services, this in turn could require mitigation proportionate to the scale of growth proposed. They request the impact of new housing development on existing community infrastructure outside of the MCC administrative area, including libraries, is addressed in the RLDP [Gloucestershire County Council].

	• Note where development may affect the operational railway developers should consider the impact on railway infrastructure such as need for better/increased parking at stations or improvements to rail services. It is appropriate to require developer contributions to fund improvements as Network Rail is a publicly funded organisation with a regulated remit [Network Rail]. • Refer to level crossings and safety measures. Note a full transport assessment should be submitted alongside proposed development in close proximity to a level crossing [Network Rail]. • Policy should make it clear that the cost of providing required infrastructure should not be at the expense of satisfying S3, S4 and relevant development management policies [Abergavenny & District Civic Society]. • Priorities such as Magor Station and improvements to Caldicot stations and Chepstow train station should be fully investigated and supported in respect of addressing climate change and supporting modal shift. Should be no development without limiting the reliance on road infrastructure and car ownership [Cllr Frances Taylor]. • Questions what is the provision/expectation for the developer to provide or support the cost of new infrastructure [Private individual x 1]. • Note there are terrible links to Bristol via rail and bus with infrequent services [Private individual x 1] • Suggest there is no evidence or planning for the obligations listed under the policy [Private individual x 1]. • State Infrastructure is at breaking point, suggest the Council should concentrate on building up commerce in the town centre benefitting those who already live in the County [Private individual x 1]. • Note while the policy appears to serve the needs of the local community, state they have little confidence the policy will be upheld [Private individual x 1].

Question 8 – Do you have any comments on Strategic Policy S6 Affordable Homes?

56 organisations or members of the public submitted a response to question 8.

A number of representors responded positively to the provision of 50% affordable homes, however concern was raised by others on the viability and deliverability of such a high proportion noting the overall viability of this approach does not appear to have been tested at this stage. The resultant impact of sites with 50% affordable homes on the delivery of sustainable places was questioned.

It was suggested the housing requirement should be higher than currently planned in the Preferred Strategy, suggest this in turn will result in an increase in the affordable housing target.

The definition of affordable housing was questioned.

Key Theme	Summary of Points Raised
Support policy	• Welcome commitment to provide up to 1850 affordable homes by 2033 [Abergavenny Town Council]. • Support innovative means of providing affordable homes, state due to the current adverse economic situation the starting point should be 50% of new homes. Note there are opportunities for both public and private sectors to commit to providing low cost homes for all age groups in a number of distinctly different ways. Refer to proven track record in partnering with developers to deliver such housing with examples given. [Melin Homes, Llanarth Estates, Tirion Homes, Candleston Homes, Sero Homes, Sero & Private individuals x 2]. • Strongly supports affordable housing-led sites [Welsh Government]. • Welcome the target and the commitment, await further details [Abergavenny & District Civic Society]. • Note the commitment to provide 50% affordable housing is ambitious but welcome the commitment to work with the Welsh Government, Registered Social Landlords and house developers to ensure that thresholds for affordable housing are achieved. Note while there is some ambiguity

	on the mechanisms of how this will be achieved it is positive the revised PS provides further detail [Leathdunn Ltd, Johnsey Estates UK, Vistry Group & Private Individual x 1]. • While support the Council's ambition to deliver affordable housing encourage the Council to ensure the policy isn't overly prescriptive to still allow viable and deliverable schemes to come forward [Redrow Homes Limited]. • Aspiration is supported in principle subject to the ongoing viability process [Richborough Estates]. • Pleased that the latest RLDP Preferred Strategy intends to allow for up to 1,100 affordable homes, recognising there can never be enough affordable homes [Private individual x 1]. • Completely agree with the Council's affordable housing targets, state it is imperative that site allocations demonstrate this can be achieved to avoid reduced delivery rates [Tompkins Thomas Planning]. • Support aspiration of the emerging Strategic Policy, comment that candidate sites that have demonstrated accordance with the requirements of the policy should be acknowledged sufficiently positively in the consideration process for the Deposit Plan [Marston's PLC]. • Agree that affordable homes are necessary, suggest the Council undertakes work to help residents understand what this means in a proactive way to reduce stigma [Private individual x 1]. • Support policy as makes sense given the significant increase in local house prices recently [Private individual x 1]. • Support policy noting if homes are to be built they should be affordable [Private individual x 1].
Provision of 50% Affordable Homes	• Raise concerns over the requirement of 50% affordable homes on all allocated sites. Question whether sites of 50% affordable housing will truly deliver sustainable places through design, layout and mix of uses that enhance the character and identity of Monmouthshire's settlements [Home Builders Federation]. • Concern over 50% delivery of affordable housing as will likely result in complex partnerships between private developers and registered social landlords and a likely need for grant funding to allow for their delivery [Barratt & David Wilson Homes and Barratt and David Wilson Homes South Wales]. • Monmouthshire Housing Association promoted the sites previously as 50/50 so position has not altered [Monmouthshire Housing Association]. • Suggest 50% affordable housing risks creating social ghettoes and considers this to be social engineering. States should let people choose where they want to live and who they want as neighbours [Private individual x 2]. • Suggest there should be over-provision of affordable housing to account for historic under-provision [Disability Advice Project]. • Delivery of 50% will need to be evidenced by testing in the Council's viability appraisals at Deposit stage with effective control over land being a main consideration. Evidence should include resolution to use public land for this purpose and binding legal agreements where the land is in private ownership or resolution by Council for Compulsory Purchase powers [Welsh Government]. • Do not support a 50% housing target on all new site allocations as consider this could cause a number of viability issues for developers. Suggest a lower target of 35% for all allocated sites and note the 50% figure should be reassessed [Hallam Land Management, Taylor Wimpey & Bellway Homes] • Suggestion that increasing the housing requirement of both market and affordable housing would signify a better method of increasing affordable provision within the County. The 50% target would cause a number of viability issues for developers, which in turn would restrict sites coming forward. Happy to work with the Council to find a mutually beneficial solution to affordability issues [Edenstone Homes and Edenstone]. • Concern over 50% provision on all new allocated sites. Suggest a lack of evidence and analysis to demonstrate 50% affordable housing can be delivered [Persimmon Homes East Wales]. • Acknowledge the affordability issues that face the County and understand the rationale behind seeking a higher level of affordable homes, state must be flexibility on a site-by-site basis, especially in considering site specific constraints [Private individuals x 2].

	• Need for flexibility in considering brownfield sites which typically have higher cost associated with demolition and site clearance [Private individual x 1]. • State no evidence to suggest the plan will deliver 50% on all new sites, note will not meet the test of soundness. Concern over viability and deliverability, suggest a sounder strategy would be to increase the overall housing requirement so the affordable housing requirement accounts for a lower proportion of housing to be delivered from allocated sites [Vistry]. • Questions how the Council will deliver, measure and guarantee the number of affordable homes [Private individual x 1]. • Suggest 50% will not be achieved as the affordable homes targets have not been met at any of the other developments in recent years [Private individual x 1].
Housing requirement	• Refer to comments in connection to Strategic Policy S1 suggesting the housing requirement should be higher than currently planned in the Preferred Strategy, suggest this in turn will result in an increase in the affordable housing target [Candleston Homes and Taylor Wimpey PLC].
Local Housing Market Assessment (LHMA)	• Refer to the LHMA for 2020 – 2025, note it is of significant concern that the Council have not yet revised the LHMA using the new approved methodology but must do so by the time the RLDP is placed on Deposit [Welsh Government].
Land values and viability	• Note the relatively high land values in Monmouthshire will assist in supporting the 50% affordable housing target and ambition of exemplar zero carbon quality development. Wish to continue to work with Monmouthshire to understand details of the viability work that supports these ambitions [Torfaen County Borough Council]. • Raise concerns over 50% provision as the viability of this approach does not appear to have been tested, no certainty this can be delivered [Home Builders Federation]. • State this is an ambitious approach may require Welsh Government policy position changes on use of Social Housing Grant or other public sector funding which is very uncertain at this stage. Suggest this should be planned for through the incorporation of an increased flexibility allowance [Barratt & David Wilson Homes]. • Viability in delivering the policy aspiration is key, 50% is an ambitious target and it may be that grant funding is needed to achieve it, final policy wording should allow flexibility to take account of site-specific conditions [Monmouthshire Housing Association]. • Note no viability evidence to accompany the revised plan at either a high level or site specific viability appraisals. This needs to be rectified by Deposit [Welsh Government]. • Acknowledge the affordable housing requirement and are more than willing to work collaboratively with the Council to meet this need but suggest the quantum of affordable housing for each site should be determined by the outcome of the accompanying viability assessments [Hallam Land Management, Taylor Wimpey, Edenstone Homes and Edenstone]. • Suggest the impact on acceptable land value has not been considered, noting there will be an inevitable reduction to land values with knock on implications on viability of sites and achieving landowner expectations. Note further viability work is imperative with the adoption of a statement of common ground to ensure all sites are being assessed with a fair and equal grounding [Persimmon Homes East Wales]. • Note as it stands the 50% target on all site allocations is untested in respect of its viability. State the next stage of Plan making must evidence this target as being reasonable and deliverable – without such evidence state the Plan will be unsound. Concern that it will not be possible to reasonably demonstrate that all allocations can deliver 50% affordable housing and suggest there is a very real risk of under delivery due to viability [Redrow Homes]. • Note affordable housing targets for open market schemes should not render those sites unviable, should be more flexibility in the final policy wording [Edenstone].

Tenure neutral approach	• The Council need to recognise the different impacts varying forms of affordable housing can have on site viability and move away from requiring tenure neutral affordable housing and ensuring that a proportion of affordable units are delivered as Low Cost Home Ownership homes to enhance the retention of younger working people within the LPA [Redrow Homes].
Lack of site in Monmouth/north of the County	• Significant concern is raised on a moratorium of any new affordable housing provision in the northern settlements of Monmouthshire - Monmouth in particular. Suggest this is unsound against Tests 2 & 3 and creates significant concern for affordability in the future [Hallam Land Management & Taylor Wimpey]. • Note affordable homes are needed but are not spatially distributed throughout the County, not meeting the affordable housing needs in the north of the County [Cllr Louise Brown].
Site specific	• Note sites being promoted CS0114 & CS0115 can make an appropriate contribution to the affordable housing need [Johnsey Estates 2020 Ltd]. • Suggest Developer profit is the only way to bring forward affordable houses in Severnside, suggest development on this scale will impact on existing residents and the area in general [Private individual x 1].
Bungalows	• Notes in view of the demographics of Monmouthshire it would be beneficial to have sites that include 1 – 3 bedroom bungalows to allow the older population to downsize in the local area to free up larger properties for younger families. Will also allow larger properties to be converted to 1/2 bedroom accommodation for those in need of affordable housing [Cllr Louise Brown] • Questions where the affordable bungalows for the elderly and affordable warden aided bungalows are proposed. Suggests getting elderly out of their family homes and into more suitable accommodation to free up larger family homes for families [Private individual x 1].
Definition of affordable housing	• No definition is provided on what an affordable home is [Private individuals x 2]. • Question what affordable housing is noting what is affordable to one, won't be for another [Private individual x 1].
Other	• Note housing delivery is reliant on the supply of aggregates and mineral products. State it is imperative that new sites do not impact upon Minerals Safeguarding Areas [Mineral Products Association]. • State references to net zero ready housing need to be included in this policy with a clear definition of the meaning of this commitment [Abergavenny & District Civic Society]. • Refer to need for homes for the County's increasingly elderly population, especially affordable homes and the increasing provision of care homes. Concern the private care homes are attracting in-migration of the elderly. Note that those moving into general market housing cannot be controlled but question whether care homes could be brought within S106 affordable housing policy [Abergavenny & District Civic Society]. • Suggest historically disabled people have been let down in types of historic affordable housing provided. Refer to detailed considerations relating to houses for disabled people [Disability Advice Project]. • Notes it is highly unlikely that the affordable housing targets will be met and that a more innovative approach is needed as relying on the offering of market developers will not work. Suggests a different model of providing affordable housing needs to be set up with social landlords obtaining bank loans to redevelop brownfield sites and putting in the investment needed [Cllr Louise Brown]. • Suggests brownfield sites could be compulsory purchased and used for affordable housing provided there is sufficient retail, employment and community facilities in a local community area [Cllr Louise Brown]. • No land allocations for self-build market and/or affordable housing in the Preferred Strategy [Cllr Louise Brown] • Suggest the Council is failing to meet demand because it cannot force developers to bring sites forward if the sums don't add up, questions how the Council intend on solving this problem [Llangybi Fawr Community Council]. • Questions how affordability will be managed vs the aspiration to build green, suggests while green builds cost more the overall cost of ownership will be less, questions why developers would do this for less financial return [Private individual x 1].

	• Should insist social housing is built first to see how fast developers step forward [Private individual x 1]. • Suggest affordable houses are only being built for people on benefits or those moving over from Bristol [Private individual x 1]. • Generally supportive of approach although note open market and mixed tenure developments also play a key role in contributing to the overall objectives of the sustainable and resilient communities strategy by providing a wider range in housing choice [Edenstone].

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

A range of comments have been made on the Strategic Sites with a total of 48 organisations or members of the public submitting a response to Question 9. Given the overlap however of this Preferred Strategic Sites question 9 and the site-specific locations: Question 10 (Abergavenny East), Question 11 (Bayfield Chepstow) and Questions 12 (Caldicot East), as well as comments on these sites under the Candidate Site Register Consultation (CS0213 Abergavenny East), (CS0098 Bayfield), and (CS0087 & CS0251 Caldicot East), these comments should be read in conjunction with these responses.

Main topics raised included over-reliance on the two larger strategic sites of 'Abergavenny East' and 'Caldicot East' and that the units proposed within these large sites would not be able to be delivered within the Plan period. There is also over-reliance and over-development in the south of the County and concern that Monmouth does not have a strategic site.

The Key themes raised are set out below:

Key Theme	Summary of Points Raised
Abergavenny East	• Over reliance on a large site. Should site struggle to deliver or be delayed there will be significant implications for plan delivery [Leathdunn, UK Johnsey Estates]. • Timescale likely to be greater than anticipated as: site is under fragmented ownership; being promoted by a housing association which appears not to have secured planning permission for a site greater than 57 homes; significant infrastructure to be delivered in advance of housing [Barratt, David Wilson Homes]. • The Preferred Strategic site for Abergavenny would breach the existing defined Railway line and A365. The precise numbers that the strategic sites need to provide should be considered in relation to the number of housing that could be secured through appropriate 'additional sites' rather than the other way around. This would limit the area required beyond the A465 and ensure that smaller deliverable well located sites which fit with the existing pattern of development of Abergavenny are allocated. This would be more in keeping with the historic development of the settlement [The Stantonbury Building and Development Company]. • The ISA acknowledges constraints to the deliverability of the proposed Strategic allocation at Abergavenny East stating that 'development will need to demonstrate phosphate neutrality and also identifies significant infrastructure to enable the delivery of the site, namely a cycle footway bridge over the A465 and railway [Marstons PLC].
Caldicot East	• We note that the site in Caldicot is partially within areas of risk for flooding [NRW]. • We note multiple potential sites in Caldicot. Here the objective should be to provide for robust ecological corridors and habitat provision for biodiversity. We advise that in considering green infrastructure provision these sites are not considered in isolation but considered together to create robust, resilient, ecological networks [NRW]. • Over reliance on a large site. Should site struggle to deliver or be delayed there will be significant implications for plan delivery [Leathdunn, UK Johnsey Estates, Manor Farm Partnership, Private Individual x 3]. • Timescale likely to be greater than anticipated as: site is under fragmented ownership; promoted by a land promoter and local authority rather than a developer; significant infrastructure to be delivered in advance of housing [Barratt & David Wilson Homes].

	• Caldicot East together with the Redwood building site in Portskewett and the proposal to build 60 on the old Depot Crick means the area will be subjected to fundamental change [Private Individual x1]. • Less homes should be expected to be delivered at Caldicot East. From adoption there would be 8 years to deliver 925 homes [Private Individual x1].
Bayfield /Chepstow	• Chepstow will have enhanced pressure from Forest of Dean developments [Cllr Louise Brown]. • Development on the edge of the town will have detrimental effects on local traffic and will not help generate significant town centre regeneration [The Chepstow Society]. • We are opposed to development west of the A466 particularly any development which would impact on the open land between Chepstow, Mathern and Pwllmeyric which has particular importance as a Gateway to Wales [The Chepstow Society]. • Traffic congestion in Chepstow will affect the viability of developments in the SE Wales. Chepstow requires significant improvement to road infrastructure [Private Individual x1]. • Already pressure on Chepstow adding more homes would be irresponsible and not representative of the wishes of the local people of Chepstow [Private Individual x1]. • Land south of Mounton Road is Preferred Site [Private Individual x1]. • A466/Mounton Road - The area is known for its high-quality landscape and is the setting for Grade II listed St Lawrence House. It is important that St Lawrence House and its setting is preserved and that is views from the public vantage points are retained [Private Individual x1].
Over reliance on Strategic sites	• Concerns with the over reliance on 2 large sites. More proportionate distribution should be planned for considering appropriate sites in the Secondary and Main Rural Settlements [Johnsey Estates 2020 Ltd]. • The three Strategic sites would account for almost 72% of the total RLDP new housing allocations and consider this puts the Council into considerable over-reliance [Marstons PLC]. • A greater diversity of sites should be put forward across a range of main settlement and sustainable rural settlement so as to best protect the agility of housing growth and avoid infrastructure delays and viability issues. This approach is consistent with the aspirations of FW2040 to support growth, rural communities, and the rural economy as well as ensure ambitious affordable housing and net zero objectives are achieved [Marstons PLC].
Deliverability	• Impractical that undeliverable Strategic housing allocations within Abergavenny, Chepstow and Caldicot represent 81% of new housing allocations. To ensure the policy meets the test of soundness smaller developer led allocated sites should be brought forward. This would provide a range and choice as well as greater flexibility over the housing trajectory [Edenstone, Grove Farm Estates, The Stantonbury Building and Development Company (1694) , Vistry, Private Individual x2]. • It is well evidenced in Lichfields 'Start to Finish: What factors affect the Build Out Rates of Large-Scale Housing Sites?' paper that sites of more than 500 dwellings can take between 5-8.4 years for the first home to be delivered. Considering this, it would hugely affect the deliverability of unit numbers stated throughout the plan period. The need for smaller additional allocations is therefore imperative to achieve growth targets [Persimmon Homes, Barratt & David Wilson Homes]. • The current under delivery of dwellings against the annual requirement in the current adopted LDP is largely attributed to slower progress on larger strategic sites than anticipated (MCC AMR 2014-2019). This is due to long lead times to implement infrastructure prior to delivery of units [Edenstone].
Infrastructure	• There is no spare infrastructure capacity in the south of the County to support the proposed developments. Any reinforcement of infrastructure will demand significant expenditure [Mathern Community Council, Cllr Louise Brown], Private Individual x1]. • Preferred Strategic sites in Caldicot and Chepstow are unworkable and cannot be accommodated due to infrastructure constraints, particularly High Beech roundabout [Cllr Louise Brown, Private Individual x1]. • Train worker strikes and unreliable Bus services make commuting by car much more likely [Cllr Louise Brown].

	• Development should be largely in the North of the County as the Heads of the Valleys Road infrastructure has been improved [Cllr Louise Brown].
Overdevelopment /growth too high	• The Southern area of the County already has 80% of the development and this plan combined with the candidate sites and development from the previous LDP will lead to overdevelopment of this area of Monmouthshire [Cllr Louise Brown, Private Individual x1]. • The RLDP should look to the brownfield sites to develop more affordable housing and just continue with the site already approved in the existing LDP which of their own will create additional traffic problems [Cllr Louise Brown]. • The overall scale of development around identified areas will destroy the very character that makes these locations desirable and increase the problems of traffic and lack of access to services [Private Individual x3].
Spatial Distribution	• Support the focussing of housing development on the primary settlements as better access to services and sustainable transport. Secondary and rural settlement dependent on the car [Usk Civic Society]. • Sites closed to existing shops and amenities should be supported [Private Individual x1]. • Growth is focussed on the wrong location to tackle the affordability crisis [Private Individual x1].
Urban Sprawl	• Candidate Sites are grouped too closely together so current outlying villages identities and sense of community lost [Private Individual x1].
Limited Information	• Limited information has been provided at this stage in relation to these sites. Further evidence is required to justify the deliverability and suitability of the strategic sites and the number of homes that can be attributed to them having regard to site capacity and the delivery timescales. Question the decision to include specific sites within the Preferred Strategy before detailed assessments have been carried out [Vistry, Marstons PLC].
Monmouth	• Object to the failure to provide for a strategic allocation within Monmouth [Redrow Homes, Hallam Land Management Ltd]. • Council should programme an early review of the RLDP and safeguard land at Monmouth earmarking for development. It is not considered the RLDP addresses the shortfall in affordable housing in Monmouth itself which will have social issues beyond homelessness [Manor Farm Partnership, Private Individual x3]. • Request that MCC continue to prioritise the finding of a solution to the phosphate issue in Monmouth and continue to engage with site promoters on land in Monmouth [Edenstone, Richborough Estates].
Brownfield Sites	• Role of brownfield sites in non-isolated rural locations should play an important role in the delivery of the growth strategy [Private Individual x1]. • Seems no real attempt has been made to identify brownfield sites in the area. Caldicot East is currently farmland or showground [Private Individual x1].
Phosphates	• Strict approach to exclude development in Monmouth could be extended to other areas, including Usk because while a solution to the phosphorus problem may have been found at the Llanfoist sewage works it cannot address pollution including raw sewage which arises below Llanfoist [Usk Civic Society].
Green Infrastructure	• Essential that site selection and development design are informed by GI considerations [NRW].
Landscape	• Given the high quality of Monmouthshire's landscapes, detailed landscape assessment should be included in site assessments [NRW]. • Where strategic growth areas either include or adjoin areas of ancient woodland we refer you to our standing Natural Resource Wales Advice Note proposals affecting Ancient Woodland [NRW].
Protected Species/Sites	• Strategic allocations must have regard to protected species – happy to assist internal ecologists. Monmouthshire has a number of internationally and nationally protected sites. Development must not have a likely a significant effect on the designated features of these sites, directly or indirectly or cumulatively. A Habitats Regulations Assessment may need to be undertaken [NRW] • Proposals disruptive to local wildlife [Private Individual x1].
SPZs	• Any development sites in SPZs need to connect to the public sewer network [Usk Civic Society].

Foul Drainage	• Important that areas for growth do not put unsustainable pressure on other foul drainage networks and this needs to be considered in liaison with Welsh Water [NRW]. • Around the County, sewers discharge directly into the Wye and River Usk due to inadequate connections to sewage works or from storm overflows. These contribute to phosphate pollution. How will this problem be resolved for the new housing developments [NRW].
Health & Wellbeing	• Strategic sites in the south will be detrimental to the tourist industry and lead to increased air pollution contrary to the council declaring a climate emergency and detrimental to the health and well-being of existing residents [Cllr Louise Brown]. • Consuming all the open green spaces that are essential for mental health. Places need to be nice to live and not built upon every square inch [Private Individual x1].
Minerals & Waste	• Delivery of strategic sites is reliant on the supply of aggregates and mineral products [Mineral Products Association]. • Is imperative that new sites do not impact upon Mineral Safeguarding Areas [Mineral Products Association].
National Grid Capacity	• We have first-hand experience of working with solar developers in undertaking grid capacity assessments and there is no grid capacity for renewable project in the Severnside Region. There will need to be significant investment in power infrastructure to meet the carbon zero aspirations. This is also the same for general capacity upgrades to handle EV fast charging points and air source heat pumps [BB3 Limited, Private Individual x1]. • Grid capacity will restrict renewable energy developments [Manor Farm Partnership, [Private Individual x2].
Net Zero Carbon Ready	• Should be built to the highest environmental standards and not the minimum standards to achieve 'net carbon ready' [Private Individual x1].
Collaborative working	• Welcome collaboration that considers the cumulative impact of development [Torfaen Council].
General /other	• Land at St Lawrence Lane should be included within the RLDP as a strategic site allocation [Vistry]. • South west of Llanfoist if not as constrained and should be included as a Preferred Strategic Site allocation. It is of a similar size to the proposed strategic site in Chepstow [Grove Farm Estates]. • Strongly consider that the RLDP should include sites that cater specifically for the older population [Grove Farm Estates]. • Notwithstanding Strategic allocation it is contended that the employment land provision would appear secondary to these allocations and might likely be uncapable of making significant contribution to the target of 6240 additional jobs in Monmouthshire [Private Individual x1]. • Usk is not on this register [Private Individual x1]. • Magor/Undy has constant development. New settlement at St Brides absurd [Private Individual x1]. • Comments in relation to Land west of Rockfield Road being filtered out at this stage [Hallam Land Management Ltd].

Question 10 – Do you have any comments on Strategic Policy S7 Preferred Strategic Site Allocation: a) Abergavenny East?

34 organisations or members of the public submitted a response to question 20 relating to Strategic Site Allocation S7a: Abergavenny East. Comments ranged from recognising the significant role the Abergavenny East site could play in contributing to the county's housing needs to raising concerns regarding the likely timescales in bringing a strategic site of this nature forward and potential impact on the RLDP's delivery trajectory. The importance of including a crossing over the A645 to the site's overall accessibility and placemaking credentials were noted along with the impact this could have on deliverability, viability, and timescales. Master planning the site to ensure it forms part of Abergavenny rather than a satellite settlement were also noted.

Key Theme	Summary of Points Raised
Supportive Comments	• Accept site has potential to provide a mixed development subject to guarantees that the considerable infrastructure challenges are fully costed and delivered. [Abergavenny Town Council, SOUL] • Support the allocation which will make a significant contribution to achieving and realising the housing and economic development needs of Abergavenny and the County. [MHA, Private Individual] • Site can play a significant role in contributing to affordable housing targets, particularly given the site promoter is MHA. [MHA] • Support the allocation which can be enhanced through the allocation of additional land to better connect the site to the existing settlement. [The Coldbrook Estate]
Objection Comments	• No certainty that the site will be able to deliver the quantum of homes that the RDLP estimates over the RLDP plan period as there is no site developer interest and also significant infrastructure costs associated with bringing the site forward which would impact on delivery rates and timescales. Based on Lichfield's Start to Finish (2nd Ed, Feb 2020) research, the most the site can estimate to deliver is 340 units. Under delivery at Abergavenny East would raise concerns in relation to the soundness of the plan. [B & DW, Hallam Land Management Ltd, Taylor Wimpey, Edenstone Homes, Edenstone Group, Bellway Homes, Tompkins Thomas Planning, Candleston Homes, Edenstone] • Delayed delivery of Abergavenny East would impact on the delivery of affordable homes. [Hallam Land Management Ltd] • Surprised site has been identified as a longer-term direction of growth given initial infrastructure requirements and sensitive location of the site. [Melin Homes, Llanarth Estates, Tirion Homes, Candleston Homes, Sero Homes, Sero, Private Individuals x 2] • Alternative Abergavenny strategic site options perform better in the ISA than Abergavenny East. [Hallam Land Management Ltd] • Site has not been correctly assessed from a landscape perspective. Site would impact on the landscape setting. [Tompkins Thomas Planning, Private Individuals x 3]
Infrastructure	• Hydraulic Modelling Assessment (HMA) of both the water supply and public sewerage networks will be required to determine the level of reinforcement works required to accommodate the proposed development. There are no issues in the foul flows from this site being accommodated at the Llanfoist WwTW. Subject to regulatory approval, intend to introduce phosphorous removal at the Llanfoist WwTW by the end of 2025. [Dwr Cymru] • Site would impact on highway capacity and flood risk. [Private Individuals x 2]
Foot bridge/A465 crossing	• Firm commitment to the early provision of a suitable active travel crossing of the A465 is required to ensure support for the proposal. [Abergavenny & District Civic Society, Abergavenny Transition Town] • Introduction of a bridge over the A465 would result in significant viability and deliverability issues – estimated costs of up to £7m. Will require extensive design and land ownership negotiations which will impact on delivery timescales. [Hallam Land Management Ltd, Taylor Wimpey], Edenstone Homes, Bellway Homes] • Abergavenny East does not offer any form of sustainable access and there will need to be significant infrastructure improvements to enable the site to be considered to be sustainably located. [Taylor Wimpey] • A new Station Interchange for Abergavenny Rail Station would be created. This would include the provision of a footbridge across the A465 and a Rail Park & Ride site (which is being promoted by WG/TfW). A new accessible footbridge is proposed following the Department for Transport funding secured via the Access for All announcement in April 2019. [MHA]
Masterplanning/ Assessments	• Masterplan for the development is essential and required as part of the RLDP to avoid the site becoming a satellite settlement. [Abergavenny Town Council, Abergavenny & District Civic Society, SOUL, Tompkins Thomas Planning, Private Individuals x 2] • NRW set out detailed assessments and factors that may need to be considered as part of the allocation including landscape, biodiversity, and drainage. [NRW]

	• Significant site assessment and master planning works have been undertaken to date by the site owners and promoters. This has been prepared based on high level site, context, and transport analysis. The site presents an opportunity to create a high-quality new neighbourhood. [MHA]
Sites promoted in response to question 20	• Edenstone Homes – consider CS0094 Penlanlas Farm would be more appropriate [Edenstone]. • Bellway Homes – CS0250 – Evesham Nurseries – [Bellway] • Tompkins Thomas Planning – CS00056 – South of Brecon Road [Tompkins Thomas Planning]

Question 11 – Do you have any comments on Strategic Policy S7 Preferred Strategic Site allocation b) Bayfield Chepstow?

48 organisations or members of the public submitted a response direct to S7 (b) regarding the Preferred Strategic Site at Bayfield Chepstow. (These comments should also be read in conjunction with Question 9 - S7 'Strategic Sites' and comments received under 'CS0098' on the accompanying Candidate Site Register consultation responses.

Overall key concerns were that prior to any development in Chepstow, infrastructure improvements in relation to improvements of services, such as GP, schools and community services and improvements to highway infrastructure. Many responses indicated that Chepstow already experiences problems with congestion and traffic, particularly at High Beech Roundabout and there is also the concern and consideration of cumulative impact with proposed development of circa 1000 homes at Severnside (CS0087& CS0251) as well as proposed new development in bordering England Counties such as 2,460 in Lydney, Forest of Dean. There is concern that further development will worsen air pollution already experienced at Hardwick Hill, which is within an Air Quality Management Area (AQMA).

In terms of the Bayfield site location, there was an overarching concern in relation to impact the proposal would have upon the setting of the adjacent Wye Valley Area of Outstanding Natural Beauty (AONB), particularly as previous planning applications have been refused on this land, and part of the reason was the harm development had on the setting of the AONB. Comments received have queried whether Mounton Road site (CS00165) was more sustainable as this site proposes a 'mixed use' including employment uses and is perceived to be closer for walking and active travel links to Chepstow's town facilities and will not impact upon the AONB.

Other comments relate to it being positive that the Bayfield site is able to deliver affordable 'net zero ready 'housing with place-making and master-planning process to be undertaken prior to allocation. However, comments have challenged whether this will be viable, and they will actually be delivered, for example 'Fairfield Mabey only delivered 22 affordable housing units'. There were also concerns in relation to out- commuting and that the development is to serve the populations of Bristol and the south west England, rather than local people.

Other concerns relate to development on greenfield land which has implications for Best Most Versatile (BMV) agricultural land, impacts upon ecology and heritage and whether identification of this this greenfield site is appropriate ahead of the green belt review as set out in Future Wales 2040.

The key themes raised are set out below:

Key Theme	**Summary of Points Raised**
Housing delivery	• Can make a meaningful contribution to the delivery of the housing and job growth rates set out in the Plan. The site could deliver a range of home over the plan period and is in one ownership and direct control of BDW. The site is deliverable early after the plan adoption [BDW]. • Considered the allocation would fail Test 3 of the Council's own Test of Soundness which are reflected in Section 64(2) of the 2004 Act and the Development Plans Manual. The proposed allocation will not deliver and it's not realistic or appropriate and is not founded on a robust and credible evidence base [Hallam Land Management Ltd, Taylor Wimpey, Edenstone Homes, Bellway Homes, Bellway Homes]. • Any large areas of house building in Chepstow would require both affordable housing and major infrastructure improvements. Housing developments will claim that schemes are not viable due to affordable housing provision and infrastructure requirements [Private Individual x1].
Housing growth	• Growth is justified in the town in order to address current shortfall [Barwood]. • 145 houses is modest and will have little impact on already the disastrous levels of congestion and pollution however would be prudent to delay development until solved [Mr Martin Andrews].

	• How can you be certain there is demand for the quantity of new houses within the County? Development in Chepstow is for the residents of Bristol. The Fairfield Mabey site was marketed to mostly Bristol residents [Private Individual x3]. • Welsh Government Policy is to focus housing to Cardiff, Newport and Valley area. MCC should be respectful of this and adopt a policy of very limited new house development to preserve the rural nature of the County and not add infrastructure issues [Private Individual x1]. • To build in areas outside recommendation from the Welsh Government means Monmouthshire and towns like Chepstow are unlikely to get much attention in any budget allocation [Private Individual x1].
Commitments	• 267 homes within Chepstow are included in the proposed commitments benefitting from planning permission as of 1st April 2022. When compared to the other commitments made Chepstow accounts for the second largest contribution of the total 1,261 sites (over 20%) [Taylor Wimpey, Edenstone Homes, Bellway Homes].
Place-making	• Well integrated with the existing community and has strong placemaking credentials to contribute towards the vibrancy of Chepstow. It will deliver: • 50% affordable homes • Net Zero carbon ready homes • Necessary supporting infrastructure • A masterplanning process • A financial viability assessment to ensure site are deliverable within the plan period [BDW]. • Chepstow is within the Gwent Levels Landscape Profiles (GLLP) Gwent Wildlife Trust. We advise the GLLP opportunities for urban areas (p9) should inform allocations in Chepstow. These include: • Embracing the opportunity to design and work with natural resources (nature-based solutions) to provide healthy, resilient and stable new development – sustainable drainage, increasing green infrastructure and open space, carbon sequestration, reduction of air pollution, wildlife friendly gardening and community orchards. • Embracing ecological and design expertise to integrate the various components of urban environments innovatively – sustainable travel (vital for reducing carbon and improving resilience) with G.I, open space, sustainable drainage, habitat retention and enhancement and development and regeneration objectives [NRW]. • Concern that housing developers will not fulfil their promises to green the site by not planting the proposed trees/ maintaining the site [Private Individual x1].
Highway safety /Active Travel	• The site is at a dangerous location for pedestrians and active travel routes are not viable across or along the A466. No safe crossing of the A466 is conveniently available for a trip into town so pedestrians are more likely to take a chance on main road. Given this is a route to school, this must be avoided [Private Individual x1, Cllr Christopher Edwards]. • There isn't a footpath or cycle path that safely connects this area with key amenities and transport [Private Individual x1]. • High speed vehicles along the B4235 Usk Road would significantly reduce safety at the entrance to the site [Private Individual x1], [Cllr Christopher Edwards]. • If Bayfield is developed further there will need to be traffic control measures at the High Beech Roundabout [Private Individual x1]. • Site is too far a walk into Chepstow and is unrealistic to think that people will walk in the town as opposed to using the car, particularly due to hilly topography and polluted main roads [Private Individual x3]. • Only one access road off the development which will further exacerbate the difficulties of the site [Private Individual x1].
Public water supply and sewerage	• There are no issue in providing this site with a supply of clean water. There are no issues in the public sewerage network accommodating the foul flows and being accommodated at our Nash Welsh water Treatment Works [Dwr Cymru/Welsh Water]. • Chepstow does not have a wastewater treatment works, but that combined sewer overflows discharge to the River Wye [NRW].

network/treatment works	
'Net Zero Carbon Ready Homes'	• Request that further guidance is issued to assist developers in this regard [BDW]. • 'Net Zero Carbon Ready Homes' should be properly defined to reduce uncertainty for developers and to ensure delivery [BDW]. • No reason why home can't be built with top rate insulation to passive house standards [Private Individual x1].
50% affordable homes	• Challenging due to development viability and delivery concerns and should be thoroughly evaluated. Social Housing Grant is very uncertain at this stage [BDW]. • Positive proposals in the application in particular addressing the need for affordable housing and rentals [Private Individual x1]. • 50% affordable housing will help attract younger families, if only a little, to Chepstow [Private Individual x1]. • Concern affordable housing won't be delivered – Mabey Bridge only 22 houses affordable [Private Individual x1]. • Most houses will not be what I would consider truly affordable [Private Individual x1].
Infrastructure (Services)	• Development of any site in Chepstow would cause detriment to town without significant investment in supporting infrastructure [Cllr Christopher Edwards, [Private Individual x7] • Examples of families who have moved to Chepstow who cannot find a dentist [Private Individual x2]. • The existing community are under-served for primary health care – only 3 GP Surgeries and one community hospital. A further increase in population will make this worse/put a strain on these services [Taylor Wimpey, Edenstone Homes, Private Individual x4]. • Chepstow has lack of funding for improvement to Schools/leisure/community facilities/ wellbeing & cultural activities [Private Individual x5]. • Chepstow is behind other Monmouthshire town in terms of funding and amenities. Chepstow school's redevelopment is low on the list why is it high on the list for more housing? [Private Individual x1]. • Public transport services in Chepstow are not fit for purpose. Lack frequency to key commuter destinations [Private Individual x1]. • Requires a realistic public transport action plan [Private Individual x1]. • If Bayfield is built Chepstow will require at least one more primary school [Private Individual x1].
Infrastructure (Highways)	• Transport Infrastructure improvements required before housing is built [Cllr Christopher Edwards, Private Individual x9]. • Current transport infrastructure cannot cope with current demands and there is significant traffic in Chepstow [Cllr Christopher Edwards, Private Individual x12]. • Highbeech roundabout already under severe congestion and pressure with traffic [Private Individual x4]. • Congestion at M48 Severn Bridge and Newhouse Roundabout [Private Individual x1]. • Road conditions are appalling. We cannot look after the roads we have now [Private Individual x1]. • One accident or roadworks and the whole town goes into gridlock [Private Individual x1]. • Large number of new residents are using Chepstow as a dormitory town. Traffic has built up at busy times and can take an hour to get from Bayfield site to M48 [Private Individual x1]. • There does not appear to be any hope for a Chepstow bypass [Private Individual x1]. • A bypass for traffic between Beechly and the M48 is needed urgently to address the well documented traffic and pollution problem [Private Individual x4]. • Increase of traffic also from the Forest of Dean [Private Individual x1.] • Chepstow has not yet felt the full impact of Fairfield Mabey development as it is not yet completed and hence traffic county understated [Private Individual x1].

	• Decision to include Bayfield must take into account the demonstrated Chepstow WelTAG Stage 1) inability of existing road infrastructure to cope with traffic growth [Private Individual x2].
Cumulative impact	• Strategic allocations focus 1,070 homes within the south eastern corner of the county where both Chepstow and Caldicot are location less than 7km apart. Significant concerns remain for the current infrastructure of the town and the cumulative pressure each of these development proposals will place on the current services and facilities [Hallam Land Management Ltd, Taylor Wimpey, Edenstone Homes, Bellway Homes, Private Individual x1].
Air Quality/Pollution	• With the additional traffic comes increased vehicle emissions and pollution [Hallam Land Management Ltd, Cllr Christopher Edwards, Private Individual x10]. • There is a localised problem of air pollution within Chepstow and the associated Air Quality Management Area (AQMA) implemented due to health impacts caused by the vehicle emissions from congestion along the A48. The cumulative impact of any development on the A466, A48 and Highbeech roundabout must be appropriately assessed and carefully considered to ensure potential air pollution impacts are limited [Hallam Land Management Ltd, Taylor Wimpey, Edenstone Homes, Bellway Homes]. • No solution of even progress towards a solution is being advanced by either the Welsh Government or the Council [Cllr Christopher Edwards, Private Individual x2].
Green Belt	• Surprising that a strategic site is identified at Chepstow ahead of the Green Belt review. This large constraint has been dismissed and not appropriately considered [Melin Homes, Persimmon Homes East Wales, Llanarth Estates, Tirion Homes, Candleston Homes, Sero Homes, Private Individual x2]. • Chepstow's constraints were reflected upon the by Inspector examining the existing LDP where a Green Belt was initially proposed and subsequently deleted. The Inspector identified that land to the west of Chepstow presents the 'least harmful location' for future development [Barwood].
Agricultural land	• The erosion of agricultural land is only a problem because of the Council's preference to drive high growth. National Policy responds to Monmouthshire's landscape by directing growth elsewhere [Cllr Christopher Edwards, Private Individual x3]. • There is a need to protect Monmouthshire's Best and Most Versatile land as set out in National Planning Policy. MCC is promoting ambitious high growth agenda heavily dependent on job creation both are which beyond the Welsh Government's growth projections. The land north of Bayfield is grade 2 BMV land and in considering what weight to give the BMV constraint MCC is under duty to address the difference between these projections [Private Individual x1].
Landscape /AONB	• Within close proximity to Wye Valley Area of Outstanding Natural Beauty (AONB). A Landscape Sensitivity Assessment (LSA) would help inform your Authority's decision on whether to progress this site. If progressed please consider informing decision with Landscape Visual Impact Assessments (LVIAs) [NRW]. • Site has the potential to significantly impact the surrounding landscape and heritage where part of the site falls within the Wye Valley AONB [Hallam Land Management Ltd, [Taylor Wimpey, Edenstone Homes, [Bellway Homes, [Cllr Christopher Edwards, Private Individual x10]. • Current planning application has significant landscape objections. Whilst proposed allocation is for a smaller scale of development it has not been demonstrated how a reduction in scale will avoid these impacts given its location. The Council should seek to first avoid harm to the special AONB landscape, and the allocation would conflict with Strategic policies S3 and S7 [Vistry]. • Houses on the hillside will break the skyline and negatively impact on important view from the AONB, Lion Gates and other valuable locations from the enjoyment of the AONB, thus eroding the high value natural landscape the RLDP claims wants to protect [Cllr Christopher Edwards, Private Individual x1]. • The reappraisal of the LSA was done by the developer promoting the site to serve its own ends [Cllr Christopher Edwards, Private Individual x1]. • The High-Level Assessment of Candidate Sites asks whether a site is subject to fundamental constraints and cannot be mitigated. No such assessment has been undertaken in relation to the proposed allocation with the box in the matrix left blank with no affirmative or negative and no reference to the fact that the site shares a boundary with the AONB [Vistry].

	• The Integrated Sustainability Appraisal (ISA) assessment of growth areas is categorised as uncertain, whilst other locations are categorised as having a significant negative effect. The respondent considers there to be a high degree of certainty that development directly adjacent to the AONB will have a significant effect on landscape and this is supported by the Council's landscape officers in assessment of the current planning application [Vistry]. • Mounton Road (Option E) performs better in the ISA in landscape terms, as endorsed by the previous LDP Inspector's comments confirming that out client's site is that least harmful location for future growth of the town [Barwood]. • Growth in this area would have a detrimental impact on the outstanding views into and out of the AONB. A large development of houses at this location will destroy the beautiful sweep of fields leading up to the wooded boundary of the AONB [Private Individual x1]. • More development close to the AONB boundary will have a detrimental impact on dark night skies within the AONB [Private Individual x1]. • More than ever people are recognising the importance of the distinctive character of these diminishing landscapes and action must be taken to ensure the preservation for generations to come [Private Individual x1].
Heritage	• Adjacent to the site is the Bishop Barnet's Wood Camp Scheduled Ancient Monument (SAM) which is of national importance and likely to be of later prehistoric period and noted as being important element within the surrounding landscape [Hallam Land Management Ltd, Taylor Wimpey, Edenstone Homes, Bellway Homes].
Ecology	• Development on greenfield sites will damage the habitat of birds, bats, badgers, butterflies [Private Individual x5]. • Dormice are present in the west of this site. The Chepstow area is important for horseshoe bats and constituent part of the Forest of Dean bat sites SAC are located just north of the town. Development proposals for land surrounding Chepstow will need to have regard to the SAC conservation objectives [NRW]. • A significant buffer of at least 15m to the adjacent woodland will be needed and a sensitive lighting scheme necessary [NRW].
Self – containment /commuting	• Chepstow has a poor level of self- containment [Melin Homes, [Llanarth Estates, [Tirion Homes, Candleston Homes, Sero Homes, Sero, Private Individual x1]. • High percentage of population that commute outside of Chepstow for work. By focusing strategic growth within Chepstow, the development could encourage commuters and therefore promote business growth and employment outside the County. The high commuter population is also linked to the ongoing issues of congestion, which the proposed strategic development would arguable exacerbate [Hallam Land Management Ltd, [Taylor Wimpey, Bellway Homes]. • Where are the local jobs? Commuting to work is the only way for working-aged people to earn a living in Chepstow [Private Individual x1].
Forest of Dean (FOD) /South Gloucester	• 2,460 homes in the neighbouring town of Lydney are currently proposed. A48 road that passes through Chepstow is the main link between the FOD and motorway network, which will put added strain on the highway capacity of Chepstow and Air Quality Management Area (AQMA) [Taylor Wimpey, Edenstone Homes, Bellway Homes, Private Individual x3]. • Over 5000 new houses have already been approved to built in nearby towns and villages e.g. Lydney, Sedbury, Beachley, Tutshill [Private Individual x1]. • Demand from nearby settlements in England ignored in the Council's assessment of the capacity for Chepstow to grow [Private Individual x1].
Public consultation	• Site selected without any formal public consultation. At the time of the production of the Preferred Strategy no assessment and no consultation has been done of the site. The site selection pre-determines the outcome of the consultation which is contrary to the required process [Cllr Christopher Edwards, Private Individual x1].
Mounton Road (CS0165)	• The Integrated Sustainability Appraisal (ISA) assesses the three proposed areas for development in Chepstow. Option E (CS0165) was demonstrated as the most sustainable choice primarily for its closer proximity to the town centre creating a more connected and inclusive space [Cllr Christopher Edwards, Private Individual x1].

	• CS0165 does not impact on the AONB in the way that CS0098 does [Cllr Christopher Edwards, Private Individual x1]. • Mounton Road is the optimum location for growth in Chepstow on the basis that it would accommodate a mix of uses (residential/hotel/commercial), is sensitively and discretely located in response of the AONB, and is well located in relation to the town centre and train station (including the various improvements to the town's public transport services emerging through the Council's Masterplan). It is unclear why Bayfield has been chosen [Barwood (1989)]. • Quicker pedestrian and cycle routes to the town centre in comparison with Bayfield. It takes 6-8 less minutes in walking time to the transport hubs in Chepstow [Barwood]. • Based on the ISA Option E is the most suitable, viable and sustainable location for the town's strategic allocation [Barwood].
Planning History	• Given the history of site CS0098 with previous refusals for development on account of the detriment caused to the AONB there is no objective justification. It must therefore be assumed that either political preferences or developer lobbying is behind the proposal. Either of which is unacceptable and undermines the confidence of the public in the planning system [Cllr Christopher Edwards, Private Individual x1]. • Objections (over 800) to the current DM/2019/00013 planning application must be taken into account as an indication of the sentiment for development on this site [Cllr Christopher Edwards, Private Individual x2]. • It's been accepted by a Planning Inspector in a previous appeal decision on the site that the potential for development to impact on the setting of the AONB is a material consideration [APP/P1235/A06/2012807,2007] [Private Individual x2].
Insufficient Information	• Insufficient detail about planned improvements for Chepstow's infrastructure to be able to have confidence on the decisions of the Preferred Strategy [Private Individual x1]. • Expected more information showing results of transport assessment with due diligence to active travel and air quality [Private Individual x1].
General/ Other	• Flooding impact [Private Individual x1]. • Why does the town of Usk never appear in your development plans? Spreading new housing across the County will reduce the impact on the major towns and have a positive impact on Usk itself [Private Individual x1]. • An incentive for minimal suitable located Chepstow housing for Chepstow job holders really ought to be the priority. The obvious implications being reduced commuting distances and fewer subsided council tax payment [Private Individual x1].

Question 12 – Do you have any comments on Strategic Policy S7 Preferred Strategic Site Allocations: c) Caldicot East?

46 organisations or members of the public submitted a response to question 12.

The comments raised concern over delivery of the site within the Plan period suggesting the quantum of development was too large to be delivered in the timeframe. There were concerns over the infrastructure necessary to bring the site forward and impact on the existing highway network. Concerns from residents in the area related to wider impact on existing facilities and services, noting these are already stretched. There were also concerns raised on how the site would change the nature and character of the area particularly the villages of Portskewett and Crick. Statutory consultees did not raise concern over the level of development but suggested additional assessments and modelling would be necessary prior to allocation in the Deposit RLDP.

Key Theme	**Summary of Points Raised**
Support policy/site	• Strongly support the allocation of Caldicot East and the contribution it can make to the RLDP. Provide detailed representations in support of the site as one of the site promoters. Note development will be brought forward on a phased basis and provides an opportunity to progress multiple outlets due to its size which will result in an increased rate of delivery per annum [Richborough Estates].
Object to policy/site	• Do not support site due to significant concerns regarding sustainability, access and infrastructure, with a key concern of concentrated delivery of development [Hallam Land Management Ltd., Taylor Wimpey, Edenstone Homes & Bellway Homes].

	• State site is too large and will fundamentally change the nature and character of the villages of Portskewett and Crick, bringing both into Caldicot [Private individuals x 3]. • A number of private individuals object to site due to one or more of the following reasons; impact on village of Portskewett, risk of flooding in wider Caldicot area due to surface water run-off, ecological impact, no NHS dentist, lack of school spaces, difficulty getting doctors appointments, pharmacy queues, lack of shops in centre, antisocial behaviour, lack of employment opportunities, lack of public transport and increase in traffic on roads. [Private individuals x 21]. • State object to site as it goes against placemaking themes in Planning Policy Wales relating to Strategic and Spatial Choices, Active and Social Places, Productive and Enterprising Places and Distinctive and Natural Places [Private individuals x 2]. • Proposed development would substantially alter the demographic of the area leading to a big difference in local needs which would need to be properly assessed [Private individual x 1]. • Concern on impact of SSSI, wildlife and habitats. Suggest development should only be focused on the Showground part of the site [Private individual x 1].
Number of dwellings proposed/ deliverability	• No certainty the site will be able to deliver the quantum of homes over the plan period as neither site has developer interest [Barratt & David Wilson Homes]. • Suggest to meet the tests of soundness the quantum of development allocated through this policy should be reduced and additional sites allocated for development to ensure consistent delivery of homes throughout the County. Promote their own sites considered elsewhere in the summary of representations [Hallam Land Management Ltd., Taylor Wimpey, Edenstone Homes & Bellway Homes]. • Consider the Preferred Strategy is overly reliant on this strategic site presenting significant risk to the delivery of housing over the plan period [Vistry]. • Given the site represents such a significant allocation for the County state it is important that it is found to be the most appropriate site and that deliverability is certain. Note it is challenging to ascertain at this stage as only a high-level candidate site assessment together with a comparative analysis of options included in the Integrated Sustainability Appraisal. Full response provides a detailed comparison between their own site and the Caldicot East site [Redrow Homes]. • Refer to research undertaken by Lichfields 'Start to Finish' (2nd Edition, Feb 2020). States if it is assumed a build out rate of 107 homes per annum from first completion and an allowance of time to secure necessary permissions, consents and infrastructure delivery the sites contribution to housing supply within the plan period will fall significantly below the 925 homes assumed in the Preferred Strategy [Edenstone Group & Edenstone].
Strategic Infrastructure	• Likely a Hydraulic Modelling Assessment (HMA) of both water supply and public sewerage networks will be required to determine the level of reinforcement works required to accommodate the proposed development. Also note a 2" distribution water main (including an abandoned stretch) traverse the site for which protection measures will be required in the form of an easement width or diversion [Dwr Cymru/Welsh Water]. • Significant infrastructure costs associated with bringing this site forward which could impact on delivery rates and timescales [Barratt & David Wilson Homes]. • No problem with the housing as it is much needed but concerned about supporting infrastructure, lack of public transport and traffic impact, particularly on Magor, Caldicot and Chepstow [Private individuals x 3].
Green Belt	• Surprised a significant site is identified at Caldicot ahead of the Green Belt review [Melin Homes, Llanarth Estates, Tirion Homes, Candleston Homes, Sero Homes, Sero & Private individuals x 2].
Proximity to M4	• Suggest it seems illogical to locate a housing estate close to the M4 junction if it is the intention of Welsh Government to alleviate the growth of traffic along the M4 in Wales particularly as Caldicot has one of the poorest levels of self-containment within the County, with just 20% of residents working locally. Concern will attract commuters from the South West at the expense of local residents who will continue to be priced out of the area [Melin Homes, Llanarth Estates, Tirion Homes, Candleston Homes, Sero Homes, Sero & Private individuals x 2].

20-minute neighbourhood	• Suggest majority of site is located outside the 20-minute neighbourhood [Hallam Land Management Ltd., Taylor Wimpey, Edenstone Homes & Bellway Homes].
Masterplanning/ Assessments	• Provide detail on proximity to designations that need to be considered as part of the development along with potential solutions on how to incorporate in the scheme are provided. Recommendation of opportunities in relation to design, ecology, drainage and natural resources also provided to inform masterplanning of the site [Natural Resources Wales].
Other	• Development Plan Manual requires the site to be identified within a published disposal strategy indicating a clear commitment to bringing the site forward at a point in time during the Plan period as it is partly within Council ownership [Redrow Homes].

Question 13 – Do you have any comments on Strategic Policy S8 Gypsy and Travellers?

6 organisations or members of the public submitted a response to question 13.

Welsh Government highlighted the need to ensure an agreed GTAA is place before the Deposit and failure to meet the identified need in the Plan could result in the plan being found unsound. It was noted that the sites should incorporate usual GI, highways, and planning considerations, with some noting the plan should not allocate site(s).

Key Theme	Summary of Points Raised
G&T need should be addressed in the RLDP.	• A GTAA should be agreed by Welsh Ministers by Deposit stage and cover the full plan period 2018 to 2033. Provision must be made in the Deposit plan for appropriate and deliverable site allocations to meet the identified need in the timescales set out. Failure to agree the GTAA and meet the identified need, specifically in the short to medium term, could result in the plan being considered 'unsound'. Therefore, encourage MCC to work with WG's Communities Division to ensure an agreed GTAA is in place by Plan Deposit. [WG] • Needs of Gypsy and Traveller community should be catered for in the Plan. [Private Individual]
Sites should consider planning considerations	• Land should not be made available without the usual GI, public open space and amenity land protections, highway, and planning considerations. [Cllr Louise Brown]
Object to G&T provision	• Object to policy and allocating Gypsy and Traveller site(s). [Private Individuals x 3]

Question 14 – Do you have any comments on Strategic Policy S9 Sustainable Transport?

50 organisations or members of the public submitted a response to Question 14 – Sustainable Transport.

Comments generally supported the concept and objectives of sustainable transport and active travel provision, such as improved cycleways, walkway and siting development along public transport routes as well as acknowledging the propensity in home working reducing the need to travel in the first place. Comments also recognised however that within a rural county such as Monmouthshire it is often difficult and unpractical to implement alternatives to the car and there is still a heavy reliance on the car and road infrastructure and not possible to walk to services/facilities within 20 minutes. There is also ambiguity over parking standards, with national policy requiring reduced parking levels however in a Monmouthshire/rural context the car remains the dominant mode of transport and only realistic mode within Monmouthshire.

Comments also reflected repeated frustration that public transport improvements are slow to progress - for example, planned improvement to Magor Walkway, Caldicot and Chepstow railway stations. Bus services are too infrequent and unreliable for people to use.

The Council needs to consider collaboration with bordering authorities when considering strategic transport improvements.

The key themes raised are set out below:

Key Theme	Summary of Points Raised
Sustainable transport	• Support sustainable transport which reduces need to travel by car and places development near public transport links [Abergavenny & Crickhowell Friends of the Earth, Vistry, Edenstone, Private Individual x2]. • Support the concept of the '20-minute neighbourhood' [Private Individual x1]. • Support the objective, however, how will investment in low carbon transport infrastructure enable more people to walk and cycle [Private Individual x1]. • Siting development alongside main transport corridors and increasing the frequency of public transport along those essential links is critical to ensure sustainable transport practices [Melin Homes, Sero, Tirion Homes, Candlestone Homes, [Private Individual x2]. • The whole system needs to be considered – it must not be regarded as sufficient for a site to be developed only to connect to footpaths outside that site when in the wider network have active travel shortcomings [Cllr Christopher Edwards, Private Individual x2]. • Respectfully suggest that the phrasing 'must' is substituted with 'should provide appropriate measures subject to site-specific considerations' [Redrow Homes Limited]. • If you cannot reduce the requirement for all residents of all ages to travel and access facilities, then this policy is a non-starter. Residents of most rural settlements' do not have the local facilities so have to travel and 'active travel' is often not achievable [Llangybi Fawr Community Council]. • The use of electric vehicles will change the way we travel - sections of the sustainable transport policy should change to reflect the increase in zero emission cares. WG policies driven by the need to cut car emissions will no longer be necessary [Private Individual x1].
Active travel	• The 20-minute neighbourhood concept must take into account topography and the feasibility for all the community to utilise the proposed walking/cycling routes. The reality of accessing local service in Chepstow particularly from the preferred site is that it is too distant to walk to local services [Cllr Christopher Edwards, Private Individual x1]. • Policy does not take account of the lack of active travel measurements between the howl of the narrow southern band of development [Cllr Louise Brown]. • No cycle paths joining up Severnside (many cyclists killed/injured on the B424) [Private Individual x1] • Active travel networks are concentrated in urban areas and do not cover links between towns and villages [Cllr Louise Brown]. • Encouragement of cycleways and separation of cycleways from roads and from footpaths to ensure separation of pedestrians from electric bikes and scooters [Private Individual x1]. •
National Development Framework	• Policy S9 is intended to provide assistance to the authority and ensure the plan and supporting evidence better aligns with the requirements in the National Development Framework (NDF) [Welsh Government].
Rural nature of Monmouthshire	• The policies here work for city areas but not for rural Monmouthshire with its market towns and rural villages. Car transport may be the only realistic form of travel in town and between villages [Cllr Louise Brown]. • Difficult to "retrofit" sustainable transportation patterns [Melin Homes, Llanarth Estates, Tirion Homes, Candlestone Homes, Sero, Private Individual x2] • Should be recognised in rural areas that it is inevitable that there will be reliance on travel by car [Private Individual x2]. • The RLDP could employ a range of interventions to maximise sustainability. This could include linking residential, community and employment allocations to ensure delivery and co-location of facilities - we note this in regard of benefits of large allocations [Melin Homes, Llanarth Estates, Tirion Homes, Candlestone Homes, Sero, Private Individual x2],

	• Proportionate growth in smaller settlement can help provide a mass of population which will help support both existing and new facilities, including transport provision, education, employment. This in turn supports sustainable transport principles and the '20-minute neighbourhood' as well as discourage the car [Monmouthshire Housing Association, Llanarth Estates, Private Individual x2]. • The concept of '20-minute neighbourhoods is not possible in several Severnside settlements. Walking from Crick for example for 20 minutes gets you to the outskirts of Caerwent. Planners cannot hide behind the get out clause that this part of Monmouthshire is exempted by the Rural Transport Clause 5.43 because by building such a large-scale development it will be made into a defacto urban area [Private Individual x1]. • Little public transport in Usk [Private Individual x1]. • Usk candidate sites will not be within 20-minute walking distance of everyday services [Private Individual x1]. • Car is king and the Welsh Government won't change that in their fantasy land [Private Individual x1].
Cross-boundary impacts	• Need to work with neighbouring authorities where there are cross boundary impacts and opportunities associated with development [Gloucestershire County Council]. • Many solutions to transport demand arising through new development in both Monmouthshire and Forest of Dean in Gloucestershire will centre on settlements, routes and hubs that stagger of are close to the borders of Monmouthshire and Gloucestershire. They stand to benefit from joined up working between the relevant authorities [Gloucestershire County Council]. • The Council needs to appreciate cross boundary opportunities as this is the case in terms of Little Mill and its relationship with Mamhilad [Monmouthshire Housing Association].
Parking standards	• The policy should address reducing parking levels [Welsh Government]. • The wording on car-parking seems curiously old fashioned "an appropriate level of parking provision depending on the nature and location of the proposal" In a world moving toward what the document mentioned elsewhere as car-haring, active travel, public transport improvements, everything aimed at reducing the need to use the private car then this may need re-thinking in a more imaginative set of wording [Abergavenny Transition Town]. • Parking provision must be appropriate to the levels of car ownership in the County. Currently 75% of homes in Monmouthshire have at least 2 cars and almost 50% 3 or more. For a poor example of car parking provision in a development Bayfield estate (Woolpitch Wood) is a like a car park [Cllr Christopher Edwards, Private Individual x1].
Public Transport	• Public Transport provision is poor in Monmouthshire [Private Individual x2]. • Public Transport alternative are inadequate and doomed for failure under current 'commercial' service approach whereby the service providers are driven by profitability [Private Individual x2]. • There are estates in this part of Wales where bus provision through the estate has not been considered during development. Will the RLDP state that developers must indicate where bus routes will run? [Disability Advice Project]. • Disparity between public transport provision across the county should be recognised in the Policy wording as well as the supporting text [Richborough Estates]. • Opportunities to offer an alternative to the car have been poorly progressed for a variety of factors. Priorities such as Magor Station, improvement to Caldicot and Chepstow, STJ train station ought to be fully investigated and supported addressing modal shift. There can be no further development without limiting the reliance on the road infrastructure and car ownership [Cllr Frances Taylor, Private Individual x1]. • Poor bus service in Magor/Undy – one per hour in week [Private Individual x1]. • More buses will not solve the problem if traffic congestion results in unreliable delayed journeys [Cllr Louise Brown]. • Congestion in and out of Chepstow has a very serious adverse effect on the local and regional bus service [Private Individual x1]. • Supports enhancements of Severn Tunnel Junctions and development walkway station at Magor [Private Individual x2].

	• Para 5.47 should more strongly commit to the Council to provide transport measures necessary to support growth. Stating that "Monmouthshire will hope to undertake" some improvements is effectively meaningless in practical terms. The wording exposes the reality that the Council will not be able to deliver sufficient transport improvements to attract people out of their cars. [Private Individual x1] • Frequency of trains between Gloucester and Cardiff needs to be greatly improved - should be minimum every 30 minutes. User confidence will drive an increase in passenger numbers [Private Individual x1]. • Require a commuter train service directly between Chepstow and Bristol. Currently only available via STJ and travel to STJ this discourages the number of Bristol workers who live in Chepstow using train travel to commute [Private Individual x1]. • People will never be persuaded to use public transport until it is cheap, efficient, reliable and accessible to all [Private Individual x1].
Home working	• Support measures aimed at encouraging remote working and the role this can play in reducing the need to travel. Achieving at high propensity of home working will reduce the need to travel in the first instance which accords with the initial aim of the sustainable transport hierarchy [Richborough Estates, Tirion Homes, [Candlestone Homes, Sero, Private Individual x2]. • Increased homeworking benefitting from improved broadband connectivity will allow workers to relocate to areas not possible previously where they can enjoy more active lifestyles and live close to family members for support and well-being [Melin Homes].
Local Transport Plan (LTP)	• The LTP is not yet available to comment [Abergavenny & Crickhowell Friends of the Earth, Usk Civic Society]
Electric Vehicle Charging (ULEVs)	• Support the principle however viability of smaller schemes will be an important consideration to the implementation of this policy [Monmouthshire Housing Association, Edenstone, Private Individual x2].
Grid capacity	• The capacity of existing energy networks to support vehicle charging will need to be considered by national energy providers to ensure there is sufficient capacity to serve local networks [Monmouthshire Housing Association, Edenstone, Private Individual x2].
Minerals & Waste	• Query why there is no reference to Objective 5 Minerals and Waste. Transport Infrastructure is reliant on the supply of aggregates and mineral products. Also, it is imperative that new sites do not impact upon Mineral Safeguarding Areas [Mineral Products Association].
Strategic Sites	• Abergavenny East will provide affordable homes in sustainable location serving the communities they are located in [Monmouthshire Housing Association]. • P66 para 5.46 referring to rail investment and the SE Wales metro scheme it says, "the identified preferred strategic growth areas of Abergavenny East (Bayfield and Chepstow) will be linted to the town centre and railway stations via active travel connections." In the current configuration of site boundaries on Abergavenny East this looks extremely unattainable [Abergavenny Transition Town]. • Mounton Road is the most accessible option for strategic future growth in Chepstow in proximity to the town centre and train station [Barwood]. • Transport Infrastructure /additional capacity must be confidently delivered before any major new development [Private Individual x1]. • Proposed Severnside development gross overdevelopment without the transport infrastructure to support [Private Individual x1].
Highway design	• Require raised kerbs at bus stops [Disability Advice Project].
General/Other	• The final bullet point and the accompanying text is unclear. We would not have thought that the scale of rural development envisaged by the plan is likely to be enough to justify such improvements; they will mainly arrive from other initiatives aiming to sustain or improve rural transport services for the existing population, especially those lacking access to car [Abergavenny & District Civic Society]. • Grove Farm Care village - co-locating living, care, medical and social facilities together provide an opportunity to deliver a sustainable development with less need for vehicle trips. The care village will offer transport minibus service for residents to move to Abergavenny town and transport noes and support employees travelling to work [Grove Farm Estates & Development]. • There has been no provision to provide greater transport links in the Chepstow Plan [Private Individual x1].]

Question 15 – Do you have any comments on Strategic Policy S10 Town, Local and Neighbourhood Centres?

18 organisations/private individuals submitted a response to question 15.

There was some support to the policy, including the classification of Abergavenny, Monmouth and Usk. Concern was however noted on the current performance of some of the centres, particularly Chepstow and Caldicot.

Others questioned the wording and context of the policy.

Key Theme	Summary of Points Raised
Support policy	• Welcome policy [Abergavenny Town Council and Abergavenny & District Civic Society]. • Agree town centres should be put first as a place for people to congregate and visit [Private individual x 1].
Area specific comments in relation to town, local and neighbourhood centres	• Failure to allow for growth in Monmouth will threaten the ongoing vibrancy and vitality of the Town Centre [Redrow Homes]. • Support classification of Abergavenny as a Town Centre at the top of the retail hierarchy but should also refer to Llanfoist as it does in the settlement hierarchy [Grove Farm Estates & Development]. • Support recognition of Usk as a local centre. Believe allocating sites would support the role of Usk as a local centre [Johnsey Estates 2020 Ltd]. • Concern Chepstow Town Centre is failing and is in decline [Private individual x 1] • Concern Caldicot Town Centre is a dead town centre both commercially and as a community hub, in order for Caldicot East to be an attractive proposition to newcomers would need it to already be a thriving and active place [Private individual x 1].
Town centre first approach	• Note Town centre should come first, reference made to petrol station near High Beech roundabout, Chepstow suggesting this policy has not been applied [Cllr Louise Brown].
Policy wording and context	• Not clear in how the aim of enhancing the role and function of town centres will be achieved in the future. Suggests this is aspirational and ignores the current decline in achieving those objectives for either Caldicot or Chepstow [Private individual x 1]. • Proposed solutions in policy do not instil confidence in a quick and robust improvement to the quality and diversity of facilities [Private individual x 1].
Other	• Would like to work with Monmouthshire on all issues concerning town centre planning, placemaking under the transforming towns programme and Place Plans [Abergavenny Town Council and Abergavenny & District Civic Society]. • Questions whether the RLDP will force developers to provide essential elements of the community such as community halls, shops and affordable housing at an early stage [Disability Advice Project]. • Usk is mentioned as somewhere that would benefit from more opportunity to walk and cycle but understand has not been allocated any of the active travel budget [Private individual x 1]. • Reference is made to specific properties in Abergavenny requesting a review of uses of vacant properties/sites [SOUL]. • State Caldicot should be regenerated as it has an anti-social behaviour problem [Private individual x 1]. • Desperate need to review the business rates system at a national level. Will help address vacancies in centres [Private individuals x 3] • Traffic congestion in south-east Monmouthshire is impacting on Chepstow Town Centre [Private individual x 1]. • Suggestion that Chepstow does not fulfil role effectively as Gateway to Wales due to lack of amenities and lack of effective planning for increased levels of traffic. Essential to ensure large scale developments are put into this context to ensure present and future residents are given opportunity to live close to viable towns and able to travel easily in and out of towns for additional needs that cannot be met by those towns such as access to A&E [Private individual x 1] • Caldicot East will increase the numbers of people using the town, the number of parking spaces will need to be increased to allow for this, particularly disabled spaces [Private individual x 1].

	• Suggestion one of the main reasons for the decline of Caldicot and Chepstow is the removal of the bridge tolls which makes shopping centres in Bristol more accessible [Private individual x 1]. • More needs to be done to entice exciting new businesses to open, not just hair salons, barbers and coffee shops [Private individual x 1].

Question 16 – Do you have any comments on Strategic Policy S11 Community and Recreation Facilities?

17 organisations or members of the public submitted a response to Question 16 –Community and Recreation facilities. Comments generally related to support for the policy however with suggestions for improvements. It was also noted that the policy was written for town/local centres (within/adjoining boundaries) and rural settlements/ areas outside of boundaries would benefit from the provision of some appropriate facilities.

The key themes raised are set out below:

Key Theme	Summary of Points Raised
Support policy	• Support this policy and the emphasis it places on protecting and retaining value facilities. Para 5.57 confirms to include buildings used for cultural purposed we suggest minor addition to include theatres on list of examples [Theatres Trust].
Provision Integral to new proposals	• Such elements should be integral to all new proposals. The Well-Being Act directs us to consider an active lifestyle and wellbeing as important aspects of daily life. This is not going to be achieved by adding development to existing communities that are already lacking in provision and where the new development lies further away from facilities and the size of the development doesn't warrant increasing the provision [Melin Homes, Llanarth Estates, Tirion Homes, Candlestone Homes, Sero, Private Individual x2].
Suggested changes to policy/wording	• This policy should go further, acknowledging the viability issues often associated with delivering such uses in isolation and therefore to allow for enabling residential development [Redrow Homes]. • "Development proposals that result in the 'unjustified' loss of community and recreation facilities will not be permitted." Need to remove the word "unjustified" as provides better protection to community facilities [Cllr Louise Brown]. • "Where a town or local centre location is not available or appropriate, development proposals that provide and/or enhance community and recreation facilities will be permitted within or adjoining settlement boundaries subject to detailed planning considerations – suggest the following is added " but not permitting such development adjoining settlement boundaries when this results in not protecting the green gaps between villages an between villages and towns to protect their distinct character and identity" [Cllr Louise Brown].
Public Open Space	• Public open space and amenity and are essential for the health and well-being of residents and there needs to be a separate policy on this topic or incorporated into Policy S11. New Policy suggested as follows "Where there is a new development the provision of open space and amenity land must always be included. Development will not result in any loss of public open space and amenity lands which must be protected, maintained and enhanced in its current location to continue and protect the green infrastructure already included within previous developments." [Cllr Louise Brown].
Allotments	• Allocation for allotments and community growing projects would be welcomes [Abergavenny Town Council].
Rural facilities	• Many rural settlements have no community or recreational facilities. It is not clear how this policy will be able to change this [Llangybi Fawr Community Council]. • Policy is written in such a way that there is assumption that community facilities will be located within a town or local centre. Some facilities listed are more likely to be better suited to areas outside of defined centres (e.g., cemeteries, allotments). The range of recreation facilities referred to in Para 5.59 are in most cases likely to be suited to areas outside of defined centres [Richborough Estates].
Other	• There are no community facilities on large strategic sites so car travel to facilities is essential [Private Individual x1]. • What facilities? A new community hall in Magor and Undy where there are already several more that are barely used [Private Individual x1].

	• Proposed solutions do not instil confidence in a quick and robust improvement to the quality and diversity of the facilities [Private Individual x1]. • Insufficient now [Private Individual x1].

Question 17 – Do you have any comments on Strategic Policy S12 – Employment Sites Provision

26 organisations or members of the public submitted a response to question 17.

Comments noted the importance of allocating suitable employment allocations alongside residential allocations. The need to provide further clarity on the Preferred Strategy proposal to increase job growth above past trends was also highlighted.

Key Theme	Summary of Points Raised
Allocations	• Concerned at the low level of candidate sites in Abergavenny/Llanfoist – suitable allocations should be made. [Abergavenny Town Council, Abergavenny & District Civic Society] • Residential development must take place in parallel with economic development. [Abergavenny Town Council, Melin Homes, Llanarth Estates, Tirion Homes, Candleston Homes, Sero, Private Individuals x 2] • Important a range of sizes and types of employment allocations are made across the settlement hierarchy. [Llanover Estates, Tirion Homes, Candleston Homes, Sero, Private Individuals x 2] • Important that land allocated for B uses are not released for other uses. [Abergavenny & District Civic Society] • Cumulative impact on the Gwent Levels should be considered when assessing candidate sites in Magor/Undy. [Cllr Frances Taylor] • Only two candidate sites for employment use in the countryside have been accepted for further assessment. It is evident that there will be a shortage of employment land to meet the targets. Further consideration should be given to the role of brownfield sites in non-isolated rural locations. [Private Individual]
Job Provision	• Council's strategy to increase job growth above past trends will require greater clarity in the Deposit plan to evidence how the Council's economic ambitions will be achieved. [WG, SOUL, Private Individual] • Need to rethink use of the phrase 'economic growth and resilience' – some parts of economic growth are un-resilient when put under a contemporary perspective of climate and nature emergency considerations. [Abergavenny Transition Town] • Policy should recognise the employment opportunities can come from various sources not just B use classes. [Grove Farm Estates & Development] • Policy does not seek to enhance the employment opportunities for internal workers for the need and demands of the demographics of Monmouthshire. [Cllr Louise Brown] • Create jobs first and improve infrastructure, then look at the requirement for housing. [Private Individual] • Most people travel of the area to major cities for employment. Don't need employment here due to proximity to major towns and cities and level of working from home. [Private Individuals x 2]
Site Specific	• Glascoed site is a major employer and should be covered by a suitable policy to support its future, ongoing use and/or allocate the Glascoed site as a 'Protected Employment Site'. BAE Systems] • SAE1h – Land at Pill Row should be retained as an employment allocation. [F1 Real Estate Management Ltd]
General	• Reference to objection 5 – Minerals and Waste should be made in relation to Policy S12. [MPA] • Dwr Cymru will support economic development, however obligations as a water and sewerage undertaker extends to 'domestic' supplies only. Where an employment allocation results in higher demands of water supply and/or trade effluent discharges we recommend early consultation. [Dwr Cymru] • No more out of town sites that make the population unhealthier – no fast-food places needed. [Private Individual]

Site promoted in response to question 17	• BAE Systems – reference to Glascoed site not being in the CS register and that it should be allocated as a unique employment allocation. [BAE Systems] • F1 Real Estate Management Ltd – SAE1h Pill Row [F1 Real Estate Management Ltd] • Private Individual – CS0016 – East of little Mill; CS0139 – Land at Former Petrol Station, Llanover [Private Individual]

Question 18 – Do you have any comments on Strategic Policy S13 Rural Enterprise?

17 organisations or members of the public submitted a response to Question 18 –Rural Enterprise. Comments were supportive of the policy with some comments refer to policy wording to be tighter to protect open countryside and Monmouthshire's valuable farmland. Other comments are supportive of rural enterprise and would like to see supportive policy framework in relation to local food production and re-generate small holdings and vacant brownfield land outside settlement boundaries.

The key themes raised are set out below:

Key Theme	Summary of Points Raised
Supportive of diversification where there is clear link to local communities	• Supportive of diversification of the rural economy where there is a clear link to local communities. Supportive of encouraging tourism uses within proximity to transport corridoes giving access to key local facilities and services. This can positively support the rural economy and ensure local provisions remain viable and available to the community as a whole [Melin Homes, Llanarth Estates Tirion Homes, Candlestone Homes, Sero Homes, Sero, Private Individual x2].
Disagree for new build	• Agree to the re-use of existing buildings but disagree to new buildings/sites [Private Individual x1].
Term definitions	• This policy area uses terms such as 'rural' 'agricultural' and 'farm diversification' without being clear of the meaning which are quite different [Abergavenny & District Civic Society].
Need for local policy for small holdings/ local production/ housing to support small holding food production	• Supportive to see produce grown and distributed locally and the range of products and rural innovations extended to reduce the resilience on imported goods, so people are aware of the value of the countryside and locally grown produce [Melin Homes, Llanarth Estates, Tirion Homes, Candlestone Homes, Sero Homes, Sero 2954, [Private Individual x2]. • Suggest there is a need for a policy that responds to changes in farming and horticulture that are increasing the demand for small new holdings accompanied by an appropriately sized tied dwelling. The present LDP makes no reference to One Planet developments and recent applications assessed against rigorous Welsh Government guidance. There should be a wider enabling policy. As part of response to climate change emergency planning policy now needs to contribute to the enabling a return to smaller holdings serving local communities [Abergavenny & District Civic Society]. • This policy (alongside Policy S2 outside Tier1-Tier 4 settlements) suggests that a re-population of the countryside might be possible for smaller holders and small farmers and maybe it is other factors currently outside planning that make the achievement of this goal seem unattainable [Abergavenny Transition Town]. • There is a strong emphasis on the need to regenerate the County's rural economy and rural settlements. The policy specifically refers to local food production (5.107) though the list of examples does not include efficient commercial regenerative agriculture on small farms. This is also recognised in Monmouthshire 2040: Our Economic Growth and Ambition Statement – this draft plan envisages rural development outside settlement development boundaries it of a scale and type compatible with the surrounding areas. Sometimes it will be possible to adapt existing buildings but building assets of much agricultural land have already been stripped and the land can only be brought back to efficient use by building small farmhouses. This process needs to be set out in the Deposit RLDP [Our Foods].

Employment uses limited to rural diversification	• Whilst appreciated that his policy is the only one addressing new development for employment use in the countryside, the scope is significantly limited to proposals for rural diversification. The policy fails to acknowledge the diversity of the countryside and consequently brownfield sites for employment in non-isolated locations are not taken in account for the purposes of the Growth Strategy • [Private Individual x1].
Rewording suggestions	• Policy to be reworded to take account of highway impact of rural diversification proposals. It is important to add because a few developments along a rural agricultural lane between Pwllmeyric and Shirenewton which is single track have been approved however intensification is making the road impassable and damaging hedges and verges. This road network is a very important consideration for residents who live on farms and undertake farming activities [Cllr Louise Brown].
Farmland to be protected	• Value farmland [Private Individual x1]. • Our rural economy must be protected, and the development of agricultural land must not be allowed [Private Individual x1].
Other	• The housing development in Usk runs contrary to all factors mentioned [Private Individual x1].

Question 19– Do you have any comments on Strategic Policy S14 Visitor Economy?

13 organisations or members of the public submitted a response to Question 18 –Visitor Economy. Comments were in general support for the policy supporting to boost Monmouthshire's economy and improve people's health and well-being, however concerns were raised into managing resulting impact, such as increased car movements and potential effect upon Monmouthshire's natural beauty.

The key themes raised are set out below:

Key Theme	Summary of Points Raised
Supportive of policy	• Understand the importance of tourism to the economy of Abergavenny and the wider hinterland. Support the policy and look forward to developing our Placemaking plans in partnership with the County Council [Abergavenny Town Council]. • Supportive of measures that actively encourage sustainable economic growth in the heart of the authority as opposed to M4 corridor. The 'stay local' advice that arose during Covid19 has encourage people to re-discover their local area and wider countryside [Llanarth Estates, Tirion Homes, Candlestone Homes, Sero Homes, Sero, Private Individual x2].
Suggests rewording to policy	• Reworded to ensure tourist facilities are located in areas that have the necessary facilities include toilets, parking and highway capacity [Cllr Louise Brown].
Opportunity for marketing of tourist sites	• The LDP process is allowing identification of smaller candidate sites for protection, most of which have unique features such as SSSI, SINC status and other attributes. Some of these have more than one of these attributes and when taken together offer an opportunity for new tourism marketing to enhance the visitor economy even further [Private Individual x1].
Adverse impact on landscape	• Monmouthshire is outstanding area of beauty and would be attractive to visitors but not if congestion problems continue [Private Individual x1]. • By allowing green spaces and historical landscapes to be developed would result in the decline of visitors to the area [Private Individual x1].
Other	• Visitor economy is minimal in Chepstow bar the races. Chepstow has lost its attraction and the points raised here are vague [Private Individual x1].

Question 20 – Do you have any comments on Strategic Policy S15 – Sustainable Waste Management?

13 organisations or members of the public submitted a response to question 20.

Comments were generally supportive of the policy but noted that waste is not restricted to household and commercial waste.

Key Theme	Summary of Points Raised
Support Policy Aims with amendments	• Supportive of policy, however, waste is not restricted to household and commercial waste. Significant amount of agricultural waste – innovative technologies should be considered, such as anaerobic digestion. [Melin Homes, Llanarth Estates, Tirion Homes, Candleston Homes, Sero Homes Sero, Private Individuals x 2] • Helpful to add a criterion noting that the storge and collection of waste or the unauthorised dumping of materials on sites without planning permission will be subject to enforcement proceedings. [Cllr Louise Brown]
Operational Issues	• Introduction of wheely bins is not suitable. [Private Individual] • No longer any municipal waste facility in Usk – noticeable increase in fly-tipping in the area since its closure. [Private Individual] • Stop charging garden waste as an 'extra'. [Private Individual] • Reusable bags for recyclables will most likely result in litter being created as rubbish escapes bags. [Private Individual]

Question 21 – Do you have any comments on Strategic Policy S16 – Minerals?

6 organisations or members of the public submitted a response to question 21.

Comments noted the policy requirement to prepare a Statement of Sub-Regional Collaboration to ensure mineral apportionments set out in the RTS2 are met. Detailed policy wording amendments were suggested by the Mineral Products Association.

Key Theme	Summary of Points Raised
Mineral Products Association (MPA) comments	• Amend policy to read: i) safeguarding known/potential sand and gravel, (delete crushed rock) (replace with) sandstone and limestone resources for possible future use, as well as the minerals related infrastructure. [MPA] • Amend policy to read ii) maintaining a minimum 10-year crushed rock (add word minimum), 7 years land-based sand and gravel reserves throughout the plan period in line with the requirements of the (add wording) national planning policy in PPW and the latest Welsh Government Technical Statement on Aggregates. [MPA] • Clarification sought on how the required 7 years land-based sand and gravel requirement will be met – assume identification of Preferred Areas or Areas of Search is site specific allocations are not brought forward. [MPA] • Paragraph 5.91 should include the following revisions – "This seeks to ensure that valuable finite resources are safeguarded for possible extraction (add) [together with mineral infrastructure] and that the use of secondary and recycled aggregates is maximised in preference to primary aggregates." [MPA] • SWRAWP annual report indicates that Ifton Quarry has been inactive for years. RTS also recognises that much of the limestone resources in South Wales lie beneath the water table within a principal aquifer. Seek clarification of how the LPA will deliver a steady and adequate supply to deliver the local plan aspirations particularly if no allocations are being brought forward. Suggest identification of Preferred Areas or Areas of Search if site specific allocations are not brought forward. [MPA] • Paragraph 5.95 – "safeguarding areas for potential sources of sand and gravel and crushed rock aggregates, (add text) [together with mineral infrastructure], will be identified on the Proposals Maps accompanying the Deposit Plan in accordance with (add text) [PPW, the RTS], the National Minerals resource Maps and the National Aggregates Safeguarding Maps for Wales." [MPA] • Welcome clear policy requirements for buffer zones in the Deposit Plan. Also seek assurances that criteria against which mineral applications are considered are covered in DM policies applied to all developments, not just minerals. [MPA]
Coal Authority Development Risk Plans	• The Coal Authority has provided Development Risk plans for the Monmouthshire Area. This data identifies those parts of the area where coal mining features are recorded to be present at surface and shallow depth. LPA is expected to assess any sites being considered for allocation against this

	data in order to ensure that any constraints or issues arising as a consequence of the coal mining features can be identified at an early stage in the process. [Coal Authority]
Regional Collaboration	• Torfaen CBC are ready to work with neighbouring LPAs on the former Gwent Statement of sub-regional collaboration as regards aggregate minerals in time for your deposit. [Torfaen CBC] • It is a requirement of the RTS2 for all authorities, including Monmouthshire, to agree a Statement of Sub-Regional Collaboration (SSRC) on their contribution to the future provision of aggregate production in the Former Gwent sub-region. A SSRC is pertinent for the region as the RTS2 identifies a shortfall of crushed rock in Newport and Torfaen, with extensive unworked reserves in Monmouthshire. [WG] • Not aware of any progress on the sub-regional statement of collaboration. [MPA] • Gloucester CC do not consider it likely that materially significant mineral and waste impacts will emerge for Gloucestershire CC as a result of implementing the PS proposals. [Gloucestershire CC]
General	• Add reference to national and regional policy requirements to the policy wording for clarity. [Cllr Louise Brown]

Question 22 – Do you have any comments on Strategic Policy S17 Green Infrastructure, Landscape and Nature Conservation?

30 organisations or members of the public submitted a response to Question 22 –Green Infrastructure, Landscape and Nature Conservation.

There is overall support for the Policy however some requests for wording changes and technical policy wording. Some respondents feel that proposing development on Greenfield land contradicts with the purpose/aims of this Policy.

The key themes raised are set out below:

Key Theme	**Summary of Points Raised**
Supports Policy	• Supports the principle of Policy S17 [Vistry]. • Principle supports however The Plan should be cautious not to over burden individual sites with policy requirements both through S17 and others that risk making otherwise viable sites undeliverable [Redrow Homes]. • Supports policy, but they are not reflected in the High-Level Assessment of the Candidates Sites [Mrs Shan Henshall]. • Supports Policy but the Preferred Strategy does not comply with the aims of this Policy. The Council's predetermination of the Preferred Site in Chepstow cannot maintain, protect or enhance the County's landscape [Cllr Christopher Edwards, Private Individual x1]. •
Suggests word change	• Not all measures will be applicable, feasible or viable for each development proposal. Respectfully suggest that the phrasing 'will include' is substituted with 'may include subject to site-specific considerations' [Redrow Homes Limited, Edenstone, Barwood]. • Wording of the policy is amended to add 'take of reasonable steps' ahead of maintain, protect, and enhance. This would be consistent with the wording and messaging of PPW [Richborough Estates]. • Add reference to maintaining and enhancing public open space, amenity land and heritage assets to the Policy [Cllr Louise Brown].
Biodiversity Gain	• Point (ii) should include reference to biodiversity gain in line with PPW11 [Melin Homes, Llanarth Estates, Tirion Homes, Candlestone Homes, Sero Homes, Sero, Private Individual x2].
SuDS	• Fully endorse this policy in particular criterion vi) the incorporation of SuDS schemes into green infrastructure has multiple benefits from a water resource and environmental perspective [Dwr Cymru/Welsh Water].

Landscape	• We support part (i) of S17 from a landscape perspective. The policy wording appears to distinguish landscapes as a subset of Green Infrastructure. We advise that landscapes are considerably broader than Green Infrastructure. Green Infrastructure doesn't include entire landscapes or include all elements of landscape, for example excluding agricultural land, buildings and structures. These distinctions should be acknowledged in the justification [NRW].
Ecosystem resilience	• Ecosystem resilience in the county of Monmouthshire is comparatively poor (evidenced by ecosystem mapping). We suggest this fact be incorporated into the supporting text to reflect the current 'health' of green infrastructure access the county and this needs to be improved/strengthened [NRW].
Water environment	• Consider that although part (vi) of the policy wording broadly covers the need for new development to maintain, protect and enhance GI through water resource management we do not consider the policy justification has conveyed the significance and importance of the water environment in this context. It is limited to the current challenge of the phosphorus issue [NRW]. • The water environment within Monmouthshire is under significant pressure. Our Water Quality Monitoring data suggests that numerous waterbodies are failing both the Water Framework Directive (WFD) targets and Habitats Directive (HD) targets. The RLDP has a role to play to prevent further deterioration as a result of development. While phosphorus levels in the SAC rivers area key concern this is far from the only water quality issues. It is recommended that this section be revised to include specific reference to the Water Environment and the importance it has within the context of S17 [NRW]. • In terms of what new developments should be seeking from a water environment perspective the RLDP should inform prospective developers that where there are watercourses running through sites solutions should be found to leave the watercourse to run its natural course. New culverts, dams or impoundments should be avoided to maintain river connectivity. Where there are existing impoundments solutions should be sought to have these removed - this might be better located in a Development Management Policy [NRW].
Green Belt/Green Wedge	• Disappointing there is not mention of creating a green belt/wedge when allocating candidate sites [Abergavenny Town Council].
Canals	• Pleased to note canals are specifically recognised as GI although document would be improved if the Monmouthshire & Brecon Canal was specifically recognised [The Canal and River Trust].
Dark skies/light pollution	• Suggest policies relating to Tranquillity and Dark skies/light pollution are developed alongside S17 through a Development Management policy [NRW].
Green Belt/Green Wedge	• Policy support advice that assessments such as Green Belt/ Green Wedge designation should be done early in the process [Private Individual x1]. • No reference to The Green Wedge Review which should have been published alongside the Preferred Strategy to inform where the proposed level of growth will go [Private Individual x1].
Other	• Disappointing not to see a comparable strategic policy for maintaining protecting and enhancing the built fabric of the County especially the heritage features [Abergavenny & District Civic Society]. • Grove Farm care villages can be delivered in line with S17[Grove Farm Estates & Development]. • The Landscape Character Assessment of the preferred site in Chepstow downgrades the value of the landscape character with no explanation or reflection of previous work. Has it been influenced by the speculative developer's own assessment in 2019? [Cllr Christopher Edwards, Private Individual x1]. • Support for the policies aims are countered by statements around recognition that the whole of Monmouthshire is a rural county and therefore exceptions must be made [Private Individual x1] • How can Policy S17 be achieved if new housing is built on green space? [Private Individual x1].
Question 23 – Do you agree with the recommendations with regard to the existing Adopted LDP Development Management Policies?	

35 organisations or members of the public submitted a response to question 23.

There was general support overall for the existing Development Management Policies. A number of organisations and members of the public recommended changes to the existing wording.

Key Theme	Summary of Points Raised
General support for existing DM policies	• Provide general support to the existing LDP policies and review recommendations [Abergavenny Town Council (1056.R25), Home Builders Federation, BB3 Limited, Leathdunn Ltd, Johnsey Estates UK, Manor Farm Partnership, Johnsey Estates 2020 Ltd, The Chepstow Society, Vistry Group, The Coldbrook Estate, Private individuals x 5].
Housing	• State H1 should make it clear that Abergavenny and Llanfoist are classified as a single settlement [Grove Farm Estates & Development]. • Refer to Policy H3 (Residential development in Minor Villages) note any rewording of this policy must not undermine the requirement that minor infill can only take place between existing dwellings as opposed to existing buildings [Raglan Community Council]. • Supports retention of Policy H7 and the intention to reflect PPW11 guidance on Affordable Housing Exception sites within or adjoining all settlement boundaries. Suggest it is important to review existing settlement boundaries to ensure all settlements include an appropriate boundary [Monmouthshire Housing Association & Private individuals x 2].
Enterprise and Employment	• Support Policy E2 (Non-allocated employment sites) noting this facilitates employment development outside of the urban settlements when it is justified and fully meet the criteria [Private individual x 1]. • Suggest the omission of Policy E3 (Working from Home) may be unwise at a time this may be increasing, dealing with complaints may require clarity of rights and policy, should be worded to cover all business use, including that for a business based elsewhere [Abergavenny & District Society]. • Refers to E3 (Working from Home) suggesting it is useful to continue with this policy as it makes clear that this is permitted provided there is no adverse impact on the local amenity and/or character of the area. Suggest also adding 'and no adverse impact on neighbourhood parking in the area' [Cllr Louise Brown]. • Refer to Policy E3 (Working from Home) noting this will become an increasing trend, but is only available with the right infrastructure, suggest the Council should have a policy on this provision, with goals for broadband speed to all communities and encouraging broadband provision within the County [Private individual x 1].
Rural Economy	• State RE3 should be renamed to 'Farm Business Diversification [Abergavenny & District Society]. • Refer to Policy RE5 (Intensive livestock/Free range poultry units) noting policy should be amended to take account of the potential effects of inappropriately located livestock development has on air quality. Suggest part d) could be amended to state 'the unit is located, designed, and uses appropriate technology, to minimise the nuisance of smell, noise and air and water pollution' [Natural Resources Wales].
Retail	• Suggest RET1 and RET2 policies need to be consistent with Placemaking Strategies proposed under S10 [Abergavenny Town Council and Abergavenny & District Society].
Landscape	• Suggest LC6 (Green Wedges) should be fully adopted and incorporated in the RLDP to meet S17 [Abergavenny Town Council]. • State LC6 (Green Wedges) should be strengthened by adding 'and to prevent urban sprawl and to protect and enhance the distinct character and identity of the villages and towns' [Cllr Louise Brown]. • Suggests any changes to LC6 (Green Wedges) should be consulted upon before being incorporated into the Plan [Private Individual x 1]. • Review of LC6 (Green Wedges) is supported [Taylor Wimpey].
Renewable Energy & Energy Efficiency	• State SD1 and SD2 need greater commitment to deliver this policy in the RLDP to meet S17 [Abergavenny Town Council].

Flooding	• No objection to the deletion of SD3 and to rely on national policy. State there is opportunity to include locally specific policy if found necessary through the SFCA work within the broader spatial policy for climate change (S4) [Natural Resources Wales]. • Suggest the policy should be retained due to the importance of preventing local flooding as a reminder to its importance both locally and nationally through TAN15. Useful to have a policy that clarifies highly vulnerable development will not be permitted [Cllr Louise Brown]. • Suggest policy is retained due to climate change and likeliness of more flooding, also to ensure local considerations aren't lost by deleting [Private individuals x 3]
Movement	• Supports the retention of MV1 (proposed developments and highway considerations) and the intention to update it in line with PPW11 refer to text in PPW11 which states 'Planning authorities must support schemes which keep parking levels down, especially off-street parking, when well designed' suggesting this statement should be considered in the context in any revised wording of Policy MV1 [Monmouthshire Housing Association, Edenstone and Private individuals x 2]. • Note MV4 (cycleways) relates to leisure cycling and should cover all aspects of Active Travel [Abergavenny Town Council & Abergavenny & District Society]. • Agree with recommendations set out for MV6 (Canals and redundant rail routes) that the existing policy has little benefit due to its limited scope. However, wish to advocate the need for an alternative strong canal related policy which recognises the multi-functionality of the canal and its wide-ranging benefits, note the existing policy is limited to considering sustainable transport alone. Provide detail of guiding principles for any new policy and suggested supporting text [The Canal & River Trust (Glandwr Cymru]. • Notes MV9 (The Road Hierarchy) should be retained due to its importance as it makes important points about traffic congestion, refers to frontages on these roads [Cllr Louise Brown].
Historic Environment	• Refer to reference on footnote on page 147, highlight the Historic Environment (Wales) Act that has been introduced to the Senedd is a consolidation act and will contain no new policies or legislation [Cadw]. • Suggest HE1 should be strengthened to align better with PPW11 paragraph 6.1.15 with a strong presumption against the granting of permission for developments which damage the character and appearance of a conservation area or its setting to an unacceptable level [Abergavenny & District Society].
Community Facilities	• Supports the retention of policy CRF2 but considers text should be amended to ensure open space is assessed and provided in the context of existing provision: 'Proposals for new residential development should provide appropriate amounts of outdoor recreation and public open space in accordance with the above standards where required. Any provision should be well related to the housing development that it is intended to serve, however the exact form and type will be determined having regard to the nature and size of the development proposed' [Monmouthshire Housing Association, Edenstone and Private individuals x 2].
Green Infrastructure	• Suggest it is likely GI1 will need to be amended to align with S17 and to ensure it delivers on the RLDP objectives regarding GI [Natural Resources Wales].
Waste	• Refer to there no longer being a tip in Usk and people having to drive to Abergavenny or Monmouth. Suggest not at a stage where the policy should be deleted as it is an on-going issue [Private individual x 1].
Other	• Suggest there isn't enough detail in the table in order to provide comment as no supporting documentation [Private individual x 2].

Question 24 – Do you have any comments on the Preferred Strategy?

42 organisations or members of the public submitted a response to Question 24 – 'Any other comments on the Preferred Strategy?

The key themes raised are set out below:

Key Theme	Summary of Points Raised
Archaeology/ Historic Guidance	• The Preferred Strategy recognises the rich heritage of the area and type of historic assets designated with statutory protection. Refers to national guidance in relation to the historic environment and advisory role of GGAT [GGAT]. • GGAT should be consulted at part of Candidate Site consultation review [CADW].
Housing mix	• The suggestion that the Council are going to dictate private market mix is not supported [Redrow].
Net zero carbon ready	• The Council need to define the term 'net zero carbon ready' homes [Redrow].
Green Belt/ Green Wedge	• Disappointed in lack of inclusion for Green Wedge provision at this stage [Abergavenny Town Council, SOUL] • Would have expected a strategic LDP policy dealing with both green belt/green wedges across the county. Green Wedges are strategic in terms of individual towns such as Abergavenny and should have been proposed at this stage of the Plan making process [Abergavenny &District Civic Society, SOUL]. • Green Wedge to west of Rogiet should be rolled back to allow for development [BB3 Limited, Manor Farm Partnership, Private Individual x3]. • Strongly object to the principle of a Green Belt in Monmouthshire [BB3 Limited, Manor Farm Partnership, Private Individual x3]. • Question why the Green Belt included in Future Wales is not included in the Key Diagram [Persimmon Homes East Wales]. • Vital that current Green Wedges are maintained [Private Individual x1]. • Important to preserve the Green Wedge between Shirenewton and Mynyddbach [Private Individual x1].
Climate Emergency	• There is a lot in the Preferred Strategy that conflicts with the Climate and Ecological emergencies [Private Individual x1].
Infrastructure	• Community facilities are currently at saturation and there is little community spirit [Private Individual x1].
Green Infrastructure	• There is no cross reference to the MCC Green Infrastructure Plan [Abergavenny Town Council]. •
Water Environment/Phosphates	• Forest of Dean is also concerned with regard to phosphate issues in the River Wye Catchment area though development is not currently restricted [FODDC]. • The water quality in riverine SAC section should include details of the way in which improvements to WwTW under the AMP programmed needs to be explained as well as the decision to halt development in Monmouth [HBF]. • Plan making process is the only opportunity to review settlement boundaries therefore critical to consider where future development can be accommodated in Monmouth once a strategic solution to phosphates can be achieved [Private Individual x1].
Designated Sites	• Surprised the Severn Estuary Marine Site is omitted from the Summary Preferred Document (P7). This seems to be the only international designated site not mentioned in the summary document [Gloucestershire County Council].
Plan Delivery/ timeline	• The likely adoption date will mean the Plan will have less than 10 years 'live' [Torfaen County Borough Council]. • Should there be any further slippage to the preparation of the plan the operational life of the RLDP will be reduced even further. Consequently, we would suggest that the plan period be extended to cover an increased timescale beyond 20233 with associated amendments to the housing requirement [Edenstone].
Collaborative working	• Will continue to work with Monmouthshire as the Plan progresses to ensure cross boundary issues are considered including growth levels, infrastructure [Torfaen County Borough Council].
Suggestions	• Home Builders Federation suggest that the fact that the County is not within a growth area as defined by the National Plan should be included and explained under the constraints section. This should include an explanation of how the plans strategy has changed from the previous strategy [HBF].

	• The Strategy should include a review on how decisions have been made and if necessary, what needs to be done to improve this [Private Individual x1].
Candidate Sites	• Accepting Candidate Sites that would appear to fit the demographic bill would be catastrophic if they ignore the dangers of flooding, urban creep, increased traffic and overwhelming traffic [Private Individual x1]. • Would have been easier to comments on sites if details of infrastructure improvements had been provided [Private Individual x1]. • Preferred sites seem to have gone through a rigorous process that has come up with an outcome that is supported by evidence - however smaller sites need to go through the same process [Private Individual x1].
Candidate Sites for Protection	• The criteria for assessment for protection does not exist. Concerned that sites for protection are now disadvantage compared with those for development [SOUL].
New Settlement	• Inappropriate and unsound to rule out a long-term policy intervention such as a new settlement without fully considering the benefits that it can bring [Candlestone Homes], Sero Homes, Private Individual x1]. • New settlement in the right location would provide an appropriate long-term opportunity away from existing problems, constraints, and issues. We believe it should be eminently feasible for the RLDP to 'dovetail' with an SDP and such an approach can provide the most sustainable way forward and ought to be achievable in a multi-tiered development plan process [Sero Homes, Sero Homes, Private Individual x1].
Chepstow	• Concerned about the lack of recognition of specific issues relating to Chepstow [The Chepstow Society]. • In Chepstow it will fail to achieve its objectives until there is a fundamental overhaul of the Business Rate System [Private Individual x1].
Reference errors	• Should reference to Gloucestershire Council in paragraph 2.2 be GCC? [Gloucestershire County Council].
Consultation process	• Insufficient time give to prepare response to the consultation exercise from the Raglan drop-in session to the end of the consultation [Raglan Community Council]. • Would welcome informal consultation with community groups prior to the publication of the Deposit Plan [Abergavenny &District Civic Society]. • Online system to make comments is difficult to use [Private Individual x1]. • More effort should be made in future public consultations to present information in an accessible format. The animation on webpage is excellent but hidden on webpages that require a lot of reading. Suggest public consultation in village halls and video played and explained in this setting [Private Individual x1]. • The lack of respect for public opinion from previous consultations and in respect of allocating preferred development sites demonstrates the Council is not serving the best interests of the people it is there is serve [Cllr Christopher Edwards, Private Individual x1]. • MCC doesn't want to listen to the views of the residents. Local residents have put forward hundreds of objections to development in Undy to no avail [Private Individual x1]. • There are frequent statements that information on detailed policies will not be available to the Deposit Plan. The policies cannot therefore be evaluated till the publication of the Deposit Plan [Usk Civic Society]. • Consultation documents animation and forms too complex suggesting feedback is not genuinely wanted [Private Individual x1].
Other	• Contradictions between all levels of policies. We need decisive action to change the way we live and the structure of our county to help counter global warming and to protect our environment for the future. This strategy is 'more of the same' [Private Individual x1]. • Preferred Strategy contains well-meaning but vague statements with no indication of how these would be evaluated. The Deposit Plan must correct this problem [Usk Civic Society]. • I can only see that the way it has been written has been done so to provide the answers the planners wanted to hear [Private Individual x1]. • Wrong conclusions based on incomplete analysis [Private Individual x1].

Question 25 – We would like to know your views on the effects that the proposals would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

16 organisations or members of the public submitted a response to question 25.

Key Theme	Summary of Points Raised
Commuting	• Suggest it will not be possible to improve the use of the Welsh language as the majority of new residents will commute to Bristol and Cardiff. Suggest newcomers won't be interested as there is little opportunity to speak it in the area [Cllr Louise Brown, Cllr Christopher Edwards & Private individuals x 3] • State can only observe that in-migration is not likely to add significantly to the County's Welsh speakers but that newcomers may choose to learn the language while visiting [Abergavenny & District Civic Society].
No effect	• Suggest the proposals will have no effect on Monmouthshire and the use of the Welsh Language [Abergavenny & Crickhowell Friends of the Earth & Usk Civic Society].
Not relevant	• Suggest Welsh Language is not relevant to planning policy [Private individual x 1]. • Notes while the Welsh Language has importance in the historic language heartlands and Cardiff it can be a divisive issue in border areas, suggest it is a Welsh policy that doesn't fit to some local areas/Counties [Private individual x 1]
Co-operative and community led housing	• Refer to co-operative and community-led housing noting this has the potential to make a difference as part of the solution to the housing crisis in Wales. Suggest community-led models support the housing needs of a local community, ensuring there is sufficient affordable housing available, which in-turn protects the survival of the Welsh language [Cwmpas].
Other	• Supports development of affordable housing sites to encourage younger demographics benefitting from Welsh Education by attending the local Welsh medium primary school to stay in the area. Suggest this helps to protect and enhance the Welsh speaking demographic to remain and grow in Abergavenny [Abergavenny Town Council]. • Note the use of Welsh language must start in the schools and progress from there, leadership should come from Welsh Government [Private individual x 1]. • Suggest family literacy classes should be offered to make learning Welsh together fun [Private individual x 1]. • State candidate sites must have adequate provision for education in Welsh Language medium [Private individual x 1].
Site promotion	• Refer to proposal for a senior neighbourhood noting there is an opportunity to incorporate the Welsh Language into signage, social events, and lessons. Suggest it offers an opportunity to allow local, Welsh speaking people to remain in their existing communities and brings opportunity for vacated housing stock to enter the market which could encourage younger residents to stay in the area bringing cultural vibrancy to Abergavenny and Llanfoist [Grove Farm Estates & Development].

Question 26 – Please also explain how you believe the proposals could be improved so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language?

4 organisations or members of the public submitted a response to question 26.

Key Theme	Summary of Points Raised
Proximity to England	• State proposals cannot improve opportunities to increase the use of Welsh language in Monmouthshire as it is too close to England [Private individual x 1].

Cymraeg 2050, Welsh Language Measure and Strategy	• Consideration should be given on how the RLDP can contribute to meeting the vision of the Welsh Language Measure and aims of Cymraeg 2050 as the new plan is formed [Welsh Language Commissioner (1341.R1)]. • The Council should consider its Welsh Education Strategic Plan (WESP) for 2022- 2032 and further the objectives of the WESP. Consideration should also be given to the Welsh Language Strategy for 2022- 2027 and explain how it will contribute to meeting the strategy's target for increasing the number of Welsh speakers in the area by 10% [Welsh Language Commissioner].
Welsh Language Impact Assessment	• Torfaen County Borough Council are undertaking a Welsh Language Impact Assessment for their RLDP noting a major component is the promotion of Welsh medium education. Note the Welsh medium pupils in the north of Monmouthshire attend Ysgol Gymraeg Gwynllyw in Pontypool. Would like a discussion on how the proposed levels of housing growth in Monmouthshire impact upon this school [Torfaen County Borough Council].
Site promotion	• Refer to proposal for a senior neighbourhood noting there is an opportunity to incorporate the Welsh Language into signage, social events, and lessons. Suggest it offers an opportunity to allow local, Welsh speaking people to remain in their existing communities and brings opportunity for vacated housing stock to enter the market which could encourage younger residents to stay in the area bringing cultural vibrancy to Abergavenny and Llanfoist [Grove Farm Estates & Development].

Question 27 – Do you have any comments on the Initial Integrated Sustainability Appraisal Report?

21 organisations or members of the public submitted a response to question 27.

Comments were made on some of the individual themes but primarily related to the appraisal of sites, in both a supportive way and by way of comparison against other sites.

Key Theme	Summary of Points Raised
Housing	• Support ISA's findings relating to strengths of apportioning housing to secondary settlements, helping to meet local housing need and ensuring benefits of growth such as provision of new community infrastructure is not just directed to highest tier settlements [Johnsey Estates 2020 Ltd].
Affordable housing	• Support the findings in that Monmouthshire is largely a rural plan area and in this context many of the smaller settlements are unlikely to support walking and cycling access to services. Despite this it is important that such settlements receive the benefits of modest growth to sustain their vitality. Also agree that despite rural isolation it is key that some growth is directed to the rural settlements [Llanover Estates, Leathdunn Ltd & The Coldbrook Estate].
Economy and employment	• Agree with the findings that the provision of employment land will have significant long term positive effects, however, suggest the ISA overlooks the function of rural settlements, particularly in light of the change in working practices which have arisen due to Covid-19. State the Deposit Plan should recognise the value of rural and main rural settlements in providing employment opportunities close to residents to reduce the need to commute out [Llanover Estates and Leathdunn Ltd]. • Suggest the economic development assessment is inadequate as it gives no basis on which future development can be judged likely to happen [Private individual x 1]
Climate change	• Would welcome greater emphasis on promoting net zero carbon targets for any new development, state promotion of schemes to encourage energy self-sufficiency through wider provision of renewable sources would make a significant contribution to a sustainable future [Abergavenny Town Council]. • Disappointed that the strategy is not expected to have any significant effect on climate change given the amount of commuting, energy efficiency in the use of buildings, energy used in construction and provision of infrastructure [Abergavenny & District Civic Society].
Historic Environment	• The recognition of the value and importance of the Historic Environment is noted. Assessed against existing policies the Historic Environment theme in the ISA growth options is recognised largely as being uncertain and dependent on detail, even in the delivery of strategic sites [Glamorgan Gwent Archaeological Trust].

Public transport	• Suggest references to bus services should be treated with caution as they are particularly liable to change [Abergavenny & District Civic Society].
Welsh Language	• Reference should also be made to the Welsh language policy making standards which place a duty on local authorities to consider the effect of policy on the Welsh language. Draw attention to the Welsh Language Commissioner's advice document 'Policy Making Standards: Creating opportunities for persons to use the Welsh Language and treating the Welsh language no less favourably than the English language' [Welsh Language Commissioner]. • Refer to paragraph 9.157 stating the statement creates ambiguity about the Council's objective to support and safeguard the Welsh language suggesting it should elaborate on this in the RLDP [Welsh Language Commissioner].
Agricultural Land	• Suggests the ISA does not address the national strategy to steer development away from Monmouthshire as it is a less sustainable location and will cause environment detriment [Cllr Christopher Edwards & Private individual x 1].
Green Belt	• State the last ISA argued for development in the north of the County due to Green Belt in the south of the County, state nothing has changed other than phosphates [Cllr Louise Brown].
Site specific - Abergavenny	• Question reference to Abergavenny as being one of the most self-sufficient settlements in terms of employment given the health service changes in the area [Abergavenny & District Civic Society]. • Suggest the appraisal of Abergavenny East is generally fair. Note the importance of an active travel route crossing the A465 and the railway is required and must be all weather [Abergavenny & District Civic Society]. • Support recognition of the significance of the role of Abergavenny as a Primary Settlement to drive growth and investment in the County and as a sustainable location to focus growth [Johnsey Estates UK & The Coldbrook Estate].
Site specific – Caldicot	• Suggests the assessment is contradictory in relation to town centre improvement as it states positive effects will be delivered through the proposed retail and leisure uses, suggests this will be detrimental to Caldicot Town Centre and will draw away trade [Private individual x 1]. • Concern the transport theme doesn't recognise limitations in public transport in the area. Refers to the appraisal of Options 1 and 2 querying no significant impact on the local road network from Chepstow and Severnside developments, particularly given the ARUP Chepstow Transport Study suggests do nothing is not an option [Private individual x 1]. • Suggests the biodiversity assessment looks at the bare minimum legal compliance with HRA and does not consider the impact of recreational use at nearby sites such as Black Rock and the Nedern [Private individual x 1]. • Suggests placemaking does not consider impacts on existing settlements such as Portskewett and Crick, which will likely be negative [Private individual x 1].
Site specific - Chepstow	• Notes the assessment of the strategic growth areas around Chepstow returns option E as the favoured site, suggests the Council do not provide explanation of why this hasn't been selected [Cllr Christopher Edwards & Private individual x 1]. • Suggest the times quoted for walking routes do not consider topography and are therefore misleading [Cllr Christopher Edwards & Private individual x 1]. • The Forest of Dean Local Plan is referred to as offering measures which could mitigate the increase in congestion in Chepstow, suggest this is speculative and not founded on positive action being taken by Governments or Council's either side of the border [Cllr Christopher Edwards & Private individual x 1]. • State there is no mention in the Health and Wellbeing section of the illegal levels of air pollution in Chepstow which is detrimental to health and wellbeing of residents [Cllr Christopher Edwards & Private individual x 1]. • Refers to the Historic Environment assessment which notes the Chepstow site is 300m from the Bishop Barnet's Wood Camp Scheduled Ancient Monument state this should read 30m and therefore sensitivity is greater than described [Private individual x 1].

Area specific - Monmouth	• Support the ISA findings that recognise the significance of Monmouth as a Primary Settlement [Vistry Group & Private individual x 1].
Appendix 1 - Review of Plans, Policies, Programmes and Strategies	• Refer to Appendix 1 noting there is no mention of Gloucestershire County Council's Minerals, Waste and Transport Plans – state this needs correcting [Gloucestershire County Council].
Promotion of sites	• Leathdunn Ltd promote CS0036 Land west of B4293 and north of Devauden [Johnsey Estates UK]. • Redrow Homes promote CS0270 Land north of Dixton Road, a number of queries to the ISA appraisal of Option H and I are listed. State Option I should be considered as the preferred strategic allocation in Monmouth [Redrow Homes]. • Redrow Homes promote CS0129 Dewstow Golf Course, a number of queries to the ISA appraisal of Option J and K are listed, object to the ISA conclusions of Severnside suggesting they are based on a flawed analysis. State Option K is a preferable site and should be included as the primary strategic growth option for Caldicot [Redrow Homes]. • Richborough Estates promote CS0087 The Showground and note concern technical information such as the masterplan, drainage strategy etc which address a lot of the points has not been considered. Concern over comments in relation to the historic environment. State the conclusions must be seen in the context of being based on a high-level assessment only and as such limitations in the conclusions and rankings which do not reflect the submissions made to date [Richborough Estates]. • Barwood Development Securities Limited promote CS0165 Mounton Road, Chepstow and consider Option E performs better than Options D and F and therefore better alternative to the strategic allocation in the RLDP [Barwood Development Securities Limited]. • Taylor Wimpey PLC promote CS0253 Ifton Manor Farm, note Option L which relates to this site is ranked the best performing option in terms of transport and movement. Suggest it is unclear how Option J could meet the criteria of Objective 15 of the ISA themes in relation to sustainable transport [Taylor Wimpey PLC].
Other	• Suggest the ISA adds little value to the plan-making process [Abergavenny & District Civic Society].

Question 28 – Do you have any comments on the Habitats Regulations Assessment (HRA)

15 organisations or members of the public submitted a response to question 28. Comments received covered key HRA impacts to be considered, mitigation strategies, the lack of information on site allocations to allow a full assessment to be undertaken and phosphates, particularly the potential solution in Monmouth.

Key Theme	Summary of Points Raised
Key HRA Considerations	• Gloucestershire CC agree that air quality, water quality/quantity, recreational pressure, and the potential for adverse impact of functional land are key considerations for the Deposit Plan. [Gloucestershire CC] • NRW agree with identified pathways. [NRW] • Advise that consideration to the fish interest of the Ramsar site is given in the deposit plan HRA. Detailed comments provided on impacts to be considered as part of the Deposit HRA. [NRW] • Undertaking an HRA is vitally important and must be applied to all allocations. [Private Individual] • Integrity of the Usk Bat Sites SAC should be taken extremely seriously. [Private Individual]
Mitigation Strategies	• Recreational mitigation strategies for the Severn Estuary and Cotswold Beechwoods produced for parts of Gloucestershire are likely to be useful evidence as they are related to other LDPs nearby. Stroud District Council are a good contact for accessing the mitigation strategies and their associated visitor survey information. [Gloucestershire CC]

Lacking information	• Frequent references to that without detailed information on proposals they cannot be assessed. Detail will not be available till the Deposit Plan is published so cannot be evaluated within comments on the Preferred Strategy. [Abergavenny & Crickhowell FoE, Private Individual, Usk Civic Society] • Does the HRA completely comply with the Environment (Wales) Act 2016? [Private Individual]
Phosphates	• Concern that upgrading sewage treatment for Abergavenny/Llanfoist will only partially deal with phosphate pollution of the River Usk. Strongly endorse planning conditions requiring phosphate neutrality. Non-statutory sector should also be included in ongoing work on maintaining the integrity of the SAC, e.g., Save the River Usk and Welsh Rivers Union. [Abergavenny & District Civic Society] • Development in Monmouth and the River Wye Catchment should not be ruled out for the Plan period due to phosphates as solution is likely. As a minimum CS0216 – Land off Hereford Road, Monmouth should be safeguarded, or development boundary adjusted with no allocation for development when phosphates conditions allow. [BB3 Limited, Manor Farm Partnership, Private Individuals x 3]
Sites promoted in response to question 28	• BB3 Ltd – CS0216 Hereford Rd, Monmouth [BB3 Ltd] • Private Individual – CS0216 Hereford Rd, Monmouth [Private Individual] • Manor Farm Partnership – CS0216 Hereford Rd, Monmouth [Manor Farm Partnership] • Private Individual – CS0216 Hereford Rd, Monmouth [Private Individual] • Private Individual – Cs0216 Hereford Rd, Monmouth [Private Individual]